

# Corporate Human Rights Benchmark 2022 Company Scoresheet



Company Name Renault

**Industry** Automotive (Own Operations and Supply Chain)

Overall Score 18.8 out of 100

Theme Score	Out of	For Theme
3.3	10	A. Governance and Policies
9.0	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
2.0	25	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

### **Detailed assessment**

#### A. Governance and Policies (10% of Total)

### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows:  Score 1  • Met: General HRs commitment: The Minerals policy states that 'Groupe Renault conducts its business in compliance with applicable legislation and is strongly committed to respecting human rights'. [Procurement of Cobalt and Minerals Policy, N/A: group.renault.com]  Score 2  • Not Met: Commitment to the UNGPs  • Met: Commitment to the OECD Guidelines for Multinational Enterprises: The 'Global Framework Agreement on social, societal and environmental responsibility': 'The Renault Group also adheres to the OECD guidelines for multinational enterprises adopted on 27 June 2000, updated in May 2011'. Regarding the Framework Agreement, the Company indicates: 'By way of this agreement, the Renault Group renews and reinforces the commitments'. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Company has a commitment to the ILO Core: It states, on its 'Global Framework Agreement on social, societal and environmental responsibility': 'The Renault Group commits to respect the principles laid down within the framework of the Declaration of the International Labour Organization (ILO)'. Regarding the Framework Agreement, the Company indicates: 'By way of this agreement, the Renault Group renews and reinforces the commitments entered into when Renault group employees' fundamental rights declaration was signed on 12 October 2004'.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			[2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]  • Met: Company has a explicit commitment to All four ILO Core: It states, on its 'Global Framework Agreement on social, societal and environmental responsibility': 'The Renault Group commits to respect the principles laid down within the framework of the Declaration of the International Labour Organization (ILO) of 1998, relating to the basic principles and rights at work: Effective abolition of child labour; Elimination of all forms of forced or compulsory labour; Elimination of discrimination in respect of employment and occupation; Freedom of association and effective recognition of the right to collective bargaining'. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]  Score 2  • Met: Company expect suppliers to commit to ILO Core: In its 2013 Global Framework Agreement, the Company indicates that 'It asks them (suppliers) to commit to applying the fundamental social rights stipulated in chapter 1 of this agreement within their own company'. Chapter 1 includes the commitment to 'to respect the principles laid down within the framework of the Declaration of the International Labour Organization (ILO)'. Regarding the Framework Agreement, the Company indicates: 'By way of this agreement, the Renault Group renews and reinforces the commitments entered into when Renault group employees' fundamental rights declaration was signed on 12 October 2004'. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]  • Met: Company explicitly list All four ILO for suppliers: On its 2013 Global Framework Agreement, the Company indicates that 'It asks them (suppliers) to commit to applying the fundamental social rights stipulated in chapter 1 of this agreement within their own company'. Chapter 1 contains commitments to 'Effective abolition of child labour; Elimination of all forms o
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Commitment to respect H&S of workers: Its Code of Conduct states that 'the Group undertakes: () to take the necessary measures to ensure that working conditions protect the health and safety of employees'. On its 'Global Framework Agreement', it indicates that: [] Nine general principles to ensure health and safety at work: avoid risks, evaluate the risks which cannot be avoided, combat the risks at source, adapt the work to the individual, adapt to technical progress, replace the dangerous by the non dangerous or the less dangerous, develop a coherent overall prevention, give collective protective measures priority over individual protective measures, give appropriate instructions to the workers'. Regarding its 'Global Framework Agreement on social, societal and environmental responsibility', the Company indicates: 'By way of this agreement, the Renault Group renews and reinforces the commitments entered into when Renault group employees' fundamental rights declaration was signed on 12 October 2004'. [2015 Code of Conduct, 2015: group.renault.com] & [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The 'Global Framework Agreement' states that 'The possibilities made available to employees enable legal working hours to be respected and ensure a reasonable individual workload for everyone. Regarding the Framework Agreement, the Company indicates: 'By way of this agreement, the Renault Group renews and reinforces the commitments entered into when Renault group employees' fundamental rights declaration was signed on 12 October 2004'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtim

Indicator Code	Indicator name	Score (out of 2)	Explanation
			consensual and paid at a premium rate. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com] Score 2  • Met: Expect suppliers to commit to H&S of their workers: On its 2013 Global Framework Agreement, the Company indicates that 'It asks them (suppliers) to commit to applying the fundamental social rights stipulated in chapter 1 of this agreement within their own company'. Chapter 1 indicates that: 'Ensuring the health and safety of its workforce as well as improving employee quality of life in the workplace are major objectives for the Renault Group. () Nine general principles to ensure health and safety at work: avoid risks, evaluate the risks which cannot be avoided, combat the risks at source, adapt the work to the individual, adapt to technical progress, replace the dangerous by the non dangerous or the less dangerous, develop a coherent overall prevention, give collective protective measures priority over individual protective measures, give appropriate instructions to the workers'. Regarding its 'Global Framework Agreement on social, societal and environmental responsibility', the Company indicates: 'By way of this agreement, the Renault Group renews and reinforces the commitments entered into when Renault group employees' fundamental rights declaration was signed on 12 October 2004'. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]  • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Guidelines for Suppliers states that they should 'Comply with the laws of each country and region regarding the setting of employees' working hours (including overtime) and the granting of scheduled days off and paid annual vacation time'. Regarding the 'CSR Guidelines for Suppliers': 'These Guidelines aim to encourage our suppliers to review their corporate activities from a CSR perspective and to take clear action to further improve their CSR
A.1.3.a.MO	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO)	0.5	Suppliers Renault-Nissan, 12/2015: group.renault.com  The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Responsible mineral sourcing: The Company indicates that 'Groupe Renault conducts its business in compliance with applicable legislation and is strongly committed to respecting human rights and to combatting child labor throughout supply chain. These positions are reflected in its policy related to procurement of cobalt and conflict-affected and high-risk minerals'. However, no publicly available statement of policy committing it to the responsible sourcing of minerals found. [Procurement of Cobalt and Minerals Policy, N/A: group.renault.com]  Not Met: Based on OECD Guidance: The webpage section Responsible Purchasing indicates: 'Actions are taken in compliance with the OECD Guidelines on Due Diligence for Responsible Supply Chains of Minerals from Conflict and High Risk Areas: Third Edition'. However, only commitments placed in policy documents (or SD form for this indicator) are considered a suitable source for this indicator under CHRB revised approach. [Responsible Purchasing (web), N/A: renaultgroup.com]  Met: Requires suppliers to commit to responsible mineral sourcing: The Company indicates that 'Suppliers shall: Comply with applicable laws regarding procurement of responsible minerals and proceed with due diligence for conflict-affected and high risks mineral, such as Tungsten, Tantalum, Tin, and Gold; Verify and inform Groupe Renault whether the minerals included in the materials or component parts are conflict-affected or high-risk minerals; Design and implement a strategy to respond to identified risks; Refrain from sourcing from illegal channels and commit to promoting a responsible supply process'. [Procurement of Cobalt and Minerals Policy, N/A: group.renault.com]  Not Met: Suppliers expected to make similar requirements of their suppliers: The Company states: 'Based on the guidelines of the OECD, suppliers shall specifically Develop due diligence policies a

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (MO)	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Women's rights: The 2021-2022 Integrated Report indicates: 'In terms of gender diversity, in January 2022, we signed the United Nations' Women's Empowerment Principles to mark our worldwide commitment to promoting gender equality in the workplace'. A commitment to the Women's Empowerment Principles (WEP) is a proxy for 'respecting women's rights, according to CHRB standards. [2021-2022 Integrated Report, 2022: renaultgroup.com]  • Not Met: Children's rights  • Not Met: Migrant worker's rights  • Not Met: Expects suppliers to respect these rights  Score 2  • Met: CEDAW/Women's Empowerment Principles: The 2021-2022 Integrated Report indicates: 'In terms of gender diversity, in January 2022, we signed the United Nations' Women's Empowerment Principles to mark our worldwide commitment to promoting gender equality in the workplace'. [2021-2022 Integrated Report, 2022: renaultgroup.com]  • Not Met: Child Rights Convention/Business Principles  • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: The Company commits to remedy: The Vigilance Plan indicates:  'Renault Group attaches particular importance to the ability of its operating entities to repair any damage that may be caused by the business as quickly as possible'. However, no publicly available statement found of a commitment it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Company expect suppliers to make this commitment Score 2  Not Met: Collaborating with other remedy initiatives  Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Zero tolerance attacks on HRs Defenders (HRDs): Regarding its grievance mechanism, the Vigilance Plan indicates: 'In accordance with the requirements of the 2016 French "Sapin II" Law on transparency, the fight against corruption and the modernization of economic life, Renault Group very early on set up a whistleblowing mechanism, WhistleB, which is accessible to Group employees, external or occasional employees and suppliers with which the Group has an established business relationship. [] Renault Group prohibits and does not practice any form of retaliation against whistleblowers' However, no evidence found of a commitment to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) specifically against human rights defenders. The indicator is looking for evidence that the Company will not retaliate against anyone who oppose a Company's operations or have raised questions about the Company's activities. [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Company expect suppliers to make this commitment Score 2  Not Met: Work with HRD to create safe and enabling environment

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment		The individual elements of the assessment are met or not as follows:
	from the top		Score 1
			Met: Board level responsibility for HRs: The Ethics and CSR Committee is tasked
			to 'reviewing and assessing procedures for reporting and controlling non-financial
		0.5	indicators (environmental, health and safety indicators and workforce-related
		0.5	reporting)'. This includes human rights. [2019 Registration Document, 13/02/2020:
			group.renault.com]
			Not Met: Describe HR expertise of Board member: The Company has provided
			comments to CHRB regarding this indicator. However, its content has not been
			found in publicly available sources.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Speeches/letters by Board members or CEO: The Company highlights, in its feedback to CHRB, the foreword signed by the CEO and Human Resources Senior Vice President. However, speeches, letters or communications need to refer specifically to the Company's approach to human rights, discussing its importance to business or challenges to respecting human rights encountered by the business. [Vigilance Plan, 2022: renaultgroup.com]
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Board/Committee review HRs strategy: Regarding the Board Charter provisions governing the missions of the Board of Directors, 'the Board of Directors shall: () discuss each year the strategic orientations of the Company and the Alliance, taking into account social and environmental issues; () promote long-term value creation by the Company and the Group, taking into account ethical, social and environmental responsibility issues; () monitor the implementation of a non-discrimination and diversity policy'. However, it is not clear the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Met: Examples/trends re HR discussion in the last reporting period: The Company indicates: 'The Board reviewed the following topics in 2020: () the non-discrimination and diversity policy, in particular with regard to the balanced representation of women and men in management bodies and beyond, as well as the equal pay policy applicable within the Group, pursuant to Article 1.7 of the AFEP-MEDEF Code and French Law No. 2018-771 of September 5, 2018, on the freedom to choose one's professional future; () Group hygiene, safety, and environmental policies'. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Score 2  Not Met: Meets both requirements under score 1  Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Incentives for at least one board member  Not Met: At least one key HR risk, beyond employee H&S  Score 2  Not Met: Performance criteria made public  Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Board process to review bussiness model and strategy  Not Met: Describe frequency and triggers for reviewing  Score 2  Not Met: Meets both requirements under score 1  Not Met: Example of actions decided

# B. Embedding Respect and Human Rights Due Diligence (25% of Total) B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a  • Met: Senior responsibility for HR implementation and decision making: The Vigilance Plan indicates: 'At the Board of Management level, the Director of Strategy and Business Development, who reports directly to the CEO, is the sponsor of the Vigilance Plan'. Regarding the Plan: 'The plan is based on Renault Group's purpose (raison d'être) and its ambitions regarding ethics, human rights, health, safety and respect for the environment. It details and maps the risks identified, specifies the action plans in place to mitigate these risks and the systems provided to make progress'. [Vigilance Plan, 2022: renaultgroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: How it assigns Day-to-day responsibility: Regarding the monitoring of measures taken and assessment of their effectiveness, the section Human Rights and fundamental freedoms section of the Vigilance Plan indicates that 'The Duty of Vigilance Steering Committee monitors measures on a monthly basis. A summary is presented to the Ethics and Compliance Committee twice a year'. The Duty of Vigilance Steering Committee is composed by: '1 representant from each of the following departments: Sustainable Development Department; Environmental Planning Department; Human Resources Department; Health, Safety, Environment, Ergonomics Department; Prevention and Protection Department; Responsible Purchasing Department; Legal Department; Ethics Department; Risk Management Department'. [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Day-to-day resources and expertise allocation in own ops  Not Met: Resources and expertise allocation in the supply chain: The Company indicates: 'For over ten years, Groupe Renault has had a dedicated team to prevent serious infringements under the duty of vigilance law. The team reports to the Purchasing department and has the following objectives: ensuring that suppliers meet standards and comply with laws, regulations and soft laws in social environmental and ethical areas (e.g. the law on the duty of vigilance, Sapin II, traceability of conflict minerals or cobalt, OECD/UN/ILO Guidelines, etc.); improving the identification and reduction of CSR risks in the supply chain; strengthening the extra-financial assessment of suppliers (through an external provider and its online platform); managing external CSR supplier audits; monitoring the implementation of appropriate corrective actions by both direct and indirect suppliers; coordinating a network of officers within local Purchasing departments'. However, it is not clear how resources for the day-to-day management of relevant human rights issues within its supply chain is allocated, as it seems to focus in processes rather than resources
B.1.2	Incentives and performance management		The individual elements of the assessment are met or not as follows:  Score 1  • Met: Senior manager incentives for human rights: The Company indicates that the Compensation scheme of Mr. Luca de Meo as Chief Executive Officer in 2020 included: 'Quality of CSR and environmental commitments: 16.66% (out of a maximum of 16.66%) All indicators related to this criterion have been met or exceeded: Health and safety (accident frequency rate) () the FR1 rate decreased in 2020 and stands at 1.33%, i.e. beyond the target which was set at 1.5%. There was also a notable drop in the most serious accidents; Gender pay-gap ratio: specific actions in each country led to a reduction in the average wage gap between men and women. The target of an average gap of 4.1% has been exceeded to reach a rate of 2.8% by the end of 2020'.
		1.5	[2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Met: At least one key HR risk, beyond employee H&S: See above. The Company has an incentive scheme linked to health and safety and gender pay-gap ratio (women's rights) [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Score 2  • Met: Performance criteria made public: The Quality of CSR commitments which has the following indicators: 'Health and safety (accident frequency rate) Gender pay-gap ratio, Defining the Climate plan (strategy, timetable and indicators)' represents weighs 15% of the CEO's fixed compensation. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Not Met: Review of other senior management performance: The 2021 Universal Registration Document indicates: 'With the announcement of the new sustainable development strategy, governance has changed. The CSR Division has become the Sustainable Development Department and now reports to the Strategy Department. The 25 objectives, divided into the three pillars of the strategy (environment, safety, inclusion), are steered by identified cross-disciplinary working groups, and a key performance indicator has been defined for each of them'. However, it is not clear the Company has it has reviewed other senior management performance incentives to ensure coherence with its human rights policy commitment. [2021 Registration Document, 2022: renaultgroup.com]
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: HR risks is integrated as part of enterprise risk system: In the 2021  Universal Registration Document, the Company describes its risks management system, and discloses its risk factors. Under 'social risk', it indicates: 'In an unstable

Indicator Code	Indicator name	Score (out of 2)	Explanation
			economic, environmental and health context, major changes are putting pressure on the company's activity. In this situation, the Renaulution strategic plan entails a transformation that will lead to changes in the organization and new business models. Energy transition issues and aggravating external factors such as the shortage of electronic components and rising prices of raw materials could lead the group to take measures relating to the employment conditions of its people. In addition, an increase in inflation in countries where Renault Group has significant operations could lead to pressure on costs at the local level. In this environment, the group runs the risk of being confronted with social movements in the countries where it operates, which could disrupt its activities'. Under the risk 'Risk of non-compliance with laws and regulations, including corruption', it explains: 'As a result of its international activities, Renault Group is subject to increasingly numerous, complex and shifting laws and regulations, particularly in the areas of automotive manufacturing, the environment, competition, labor law, new technologies and cybersecurity (in particular, see chapter 1.4 "Regulatory environment" of this Document). However, although it indicates labor law risks, it seems to focus on how changes in labor regulation may affect the Company's negatively, rather than a concern with not complying with regulations and its impacts on human rights. [2021 Registration Document, 2022: renaultgroup.com]  Not Met: Provides an example: Regarding the 'social risk', the Company indicates its risk management procedure: 'Building on its Global Framework Agreements of 2013 and 2019, Renault Group has a dynamic of social dialogue both at the global level through its Group Works Council and at the local level with employee representative bodies. Renault Group is committed to dealing with these changes and the associated risks through regular, qualitative social dialogue, allowing global and local agreements to be reached wher
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a  • Not Met: Communicates its policy to all workers in own operations: The Company's 2013 Global Framework Agreement on social, societal and environmental responsibility sets out its human rights commitments. It 'has been translated into the languages of the various countries in which Renault operates, and is made available to all personnel, and in particular the management'. However, no further details found on how it actively communicates commitments to all workers. In its feedback to CHRB, the Company provides various links to access different webpage sections. In one of them, the Company publishes its commitments. It has also provided a link to its Intranet. Finally, it has provided a link to its media website. However, although it indicates it has its commitments published online to anyone to access, it is not clear how it proactively communicates its policy commitment to all its workers, including in local languages where necessary. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]  Score 2  • Not Met: Communication of policy commitments to stakeholder  • Not Met: How policy commitments are made accessible to audience

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1  • Met: Meets ILO requirement for suppliers on A.1.2.a: See A.1.2.a.a [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]  • Met: Requires suppliers to communicate policy requirements: The Company, in its Guidelines for Suppliers, indicates that 'We also encourage you to disseminate and promote the areas covered in this booklet through your own supply chain'. Same requirement is made at the end of the guidelines, where supplier commitment form states that 'the supplier recognizes that Renault and Nissan encourage dissemination of the principles included in the present guidelines throughout his own supply chain'. Suppliers have to sign the document and return it to Renault. The document contains the requirements the Company expectants suppliers to fulfil regarding human rights. [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com] Score 2  • Met: How HR commitments made binding/contractual: Regarding its 2013 Global Agreement, the Company indicates that 'The Renault Group undertakes to communicate this agreement to its suppliers and sub-contractors. It asks them to commit to applying the fundamental social rights stipulated in chapter 1 of this agreement within their own company'. The agreement contains the Company's human rights commitments and complements the 2019 Global Agreement. The supplier guidelines document includes a form for the supplier to sign: 'Renault and Nissan request that all suppliers who receive the CSR Guidelines submit the "Supplier Commitment" form signed by a legal representative. By signing this form, the supplier acknowledges having read and accepted all the aforementioned terms and conditions as regards all services or parts ordered by or delivered to Renault and/or Nissan'. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com] & [Guidelines for Suppliers indicates:
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Scores at least 1 on A.1.2.a: See A.1.2.a.  • Not Met: How workers are trained on HR policy commitments: The 2013 Global Framework Agreement indicates: 'In accordance with the Global Compact, the Renault Group opposes, in particular, all forms of corruption. The Renault Group makes employees aware of this issue through the Renault Group's ethical Charter and various communication and/or training materials'. Moreover, according to the Registration Document, the Company also affirms that there are 'Discussions with the ILO for the roll-out of training on fundamental social rights'. It also provides: 'Training policies implemented, in particular those relating to environmental protection'. However, it is not clear how workers are actually trained on the Company's human rights commitments. No description of the training found. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com] & [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Not Met: Trains relevant managers including procurement: The Registration Document states: 'In February 2020, the International Labor Relations department, in partnership with the ILO, organized a three-day training course at the ILO Training Centre in Turin for the members of the Group Works Council Restricted Committee. Training focused in particular on industrial relations systems in Europe, trade union and collective bargaining freedoms, and the application of fundamental social rights in supply chains'. Moreover, on its website, it indicates that it offered 'training in inclusive management'. However, it is not clear its relevant managers and workers, including those working on procurement, receive specific human rights training relevant to their role. [Training on inclusive management, N/A:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			renaultgroup.com] & [2020 Universal Registration Document, 15/03/2021: renaultgroup.com] Score 2  • Met: Score of 2 on A.1.2.a: See A.1.2.a.  • Not Met: Meets both requirements under score 1  • Not Met: Trains suppliers to meet company's HR commitment
B.1.6	Monitoring and corrective actions	1	Not Met: Disclose & trained The individual elements of the assessment are met or not as follows: Score 1  Met: Scores at least 1 on A.1.2.a: See A.1.2.a. Met: Monitoring implementation of HR policy commitments across global ops and supply chain: it indicates: 'a mechanism has been implemented for the monitoring of human rights and fundamental freedoms. The aim is, in light of our industrial and commercial activities and the diversity of the countries in which Renault operates, to identify the risks incurred and to draw up a map, based in particular on reports published by the ILO, which may go beyond the fundamental social rights identified within the global framework agreements. It is on this basis that Groupe Renault has decided to pay particular attention to the implementation of ILO Convention No. 100 (Equal Compensation) and ILO Convention No. 111 (Discrimination, Employment and Occupation). This monitoring system is supplemented by feedback from the Group's various departments, and more specifically, from the Ethics and Compliance department () and the Purchasing department, from European and international social partners, as well as from the professional whistle-blowing system, which is accessible to Group employees, external or occasional employees and suppliers'. Moreover, in the context of its supply chain, the Company indicates that 'For those parts production facilities or service provision entities representing the highest potential risks and which have never undergone a CSR assessment, or for which the CSR assessment is not at the required level, external companies carry out audits on the ground. In order to reduce the risks, these sites are audited based on a triennial plan'. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  *Met: Peroportion of supply chain monitored: It indicates that in 2020 the 'percentage of direct purchase volume covered by a CSR assessment' was 93.1%. This figure covers' top 500 parts and Top 200 services suppliers (representing approximately 8% of
B.1.7	Engaging and terminating business relationships	1	15/03/2021: renaultgroup.com] & [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Disclose findings and number of corrective action  The individual elements of the assessment are met or not as follows:  Score 1  Met: HR affects selection of suppliers: The Company indicates that it uses 'purchasing processes which incorporate CSR criteria into selecting suppliers and subcontractors to add to the supplier list, and into awarding new contracts'. The

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			CSR expectations for suppliers include matters of safety and quality, human and labour rights, compliance. [2019 Registration Document, 13/02/2020: group.renault.com] & [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]  • Met: HR affects on-going supplier relationships: In addition to the above, the Company indicates that 'an Internet platform (through an external solution) to assess suppliers' and subcontractors' CSR policies and actions, and to incorporate the CSR performance of suppliers into purchasing decisions. On any topics relating to the content of these documents, any uncorrected non-compliance could result in measures being taken that may include the termination of relations with the Company in question'. The CSR expectations for suppliers include matters of safety and quality, human and labour rights, compliance. [2019 Registration Document, 13/02/2020: group.renault.com] & [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]
			• Not Met: Describe positive incentives offered to respect human rights: One of the objectives of the CSR-focused purchasing team is: 'strengthening the extra-financial assessment of suppliers (through an external provider and its online platform)'. As indicated above, through this platform it incorporates CSR performance into purchasing decisions. However, it is not clear how specific positive incentives are put into place via its purchasing practices to encourage its business relationships to act with respect for human rights. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Not Met: Working with suppliers to meet HR requirements: The CSR-focused purchasing team also: ensures 'that suppliers meet standards and comply with laws, regulations and soft laws in social environmental and ethical areas (e.g. the law on the duty of vigilance, Sapin II, traceability of conflict minerals or cobalt, OECD/UN/ILO Guidelines, etc.); () [improves] the identification and reduction of CSR risks in the supply chain'. However, it is not clear how the Company supports business relationships, including suppliers, in meeting the company's requirements.
B.1.8	Approach to engagement with affected stakeholders	0	[2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company discloses, in its 2020 Universal Registration Document, a list of stakeholders, including employees, suppliers, local communities, institutions and associations. It also discloses the modes of dialog and communication for each group of stakeholders. Additionally, in its feedback to CHRB, it makes reference to its Whistle B [grievance channel]. However, it is not clear how it has identified affected and potentially affected stakeholders with them in the last two years. The description has to include including workers or local communities in its supply chain. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Not Met: Discloses stakeholders that HRs may be affected  Not Met: Provides two examples of engagement with stakeholders: The Company has provided sources to this indicator, however, they were written in French and CHRB only accepts documents written in English. It has also provided additional comments, however, its content has not been found in publicly available sources. Score 2  Not Met: Analysis of stakeholder views on company's HR issues  Not Met: Describe how views influenced company's HR approach

## **B.2 Human Rights Due Diligence (15% of Total)**

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Indicator name Identifying human rights risks and impacts	Score (out of 2)	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Identifying risks in own operations: In its Vigilance Plan the Company explains its risk mapping: 'In fulfilling its duty of vigilance, Renault Group maps the risks involving human rights that its own activities entail for women and men. The methodology that has been adopted includes this mapping in the system used to manage the Group's major risks. Ten risks have been identified, analyzed and prioritized by specialists in six departments: Human Resources, Ethics, Purchasing, Prevention and Protection, Sustainable Development and Risk Management. This risk mapping was presented to the Group's EVP in charge of Human Resources, who approved it along with the associated action plan. This mapping is based on: A list of risks compiled based on a benchmark with industrial companies in the automotive, food-processing, luxury, energy and transportation sectors; A process to analyze alerts []; Monitoring of the social, economic and regulatory environment in the Group sites' host regions. A mechanism has been implemented for the monitoring of human rights and fundamental freedoms; The reports published by the ILO, which may go beyond the fundamental social rights identified in the Global Framework Agreements'. [Vigilance Plan, 2022: renaultgroup.com]  • Met: Identifying risks through relevant business relationships: The Company states, in its 2020 Universal Registration Document, that actions within the vigilance plan cover supply chain: 'These measures also cover the activities of subcontractors or suppliers with whom an established commercial relationship is in place, when these activities are related to this relationship'. In addition, the Vigilance Plan also explains its risk mapping in its supply chain: 'To prioritize them [Human rights and fundamental freedoms risks; Health and safety risks; Environment risks], Renault Group relies on an external database, the experience of in-house specialists, and analysis of audit reports ov
			• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The 2019 Registration Document indicates that 'Groupe Renault establishes and implements a vigilance plan including reasonable vigilance measures enabling identification of risks and prevention of serious harm in respect of human rights and fundamental freedoms, health and safety of persons and the environment, resulting from its activity'. As it is stated above, in its Vigilance Plan the Company explains its risk mappinging: 'The methodology that has been adopted includes this mapping in the system used to manage the Group's major risks. Ten risks have been identified, analyzed and prioritized by specialists in six departments: Human Resources, Ethics, Purchasing, Prevention and Protection, Sustainable Development and Risk Management. This risk mapping was presented to the Group's EVP in charge of Human Resources, who approved it along with the associated action plan. This mapping is based on: A list of risks compiled based on a benchmark with industrial companies in the automotive, food-processing, luxury, energy and transportation sectors; A process to analyze alerts []; Monitoring of the social, economic and regulatory environment in the Group sites' host regions. A mechanism has been implemented for the monitoring of human rights and fundamental freedoms; The reports published by the ILO, which may go beyond the fundamental social rights identified in the Global Framework Agreements'. It also indicates how it prioritises risks in its supply chain. It is not clear, however, whether and how the Company consults with affected stakeholders in the risk identification process. [2019 Registration Document, 13/02/2020: group.renault.com] & [Vigilance Plan, 2022: renaultgroup.com]  • Not Met: Triggered by new circumstances: No description found, in its Vigilance Plan, of how its process to identify human rights risks and impacts are triggered by new country operations, new business relationships, new human rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Describes risks identified: The Vigilance Plan indicates different risks identified in its own operations: 'Interfering with freedom of association, the right to organize and the right to collective bargaining Invading privacy, Discrimination in recruitment, Discrimination in the workplace, Slavery and human trafficking, Child labor, Forced labor, Indecent working conditions, Indecent salary, Negative impact on local communities'. However, it is not clear the risks identified specifically in relation to new country operations, new business relationships, new human rights challenges or conflict affecting particular locations, including through heightened due diligence in any conflict-affected areas. [Vigilance Plan, 2022: renaultgroup.com]
B.2.2	Assessing human rights risks and impacts	1	The individual elements of the assessment are met or not as follows: Score 1  • Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates that, in accordance with the law on the duty of vigilance, 'the law no. 2017-399 dated March 27, 2017 on the duty of vigilance, the Group Human Resources, Corporate Social Responsibility, Group Prevention and Protection, Group Ethics and Compliance, Purchasing and Health, Safety and Environment departments have continued their work, supported by regular talks with the Worldwide Group Works Council secretary. Pursuant to the ILO Application of International Labor Standards, additional vigilance was put in place, with feedback from the countries, from either the CSR department, local HR directors, social partners or Ethics officers. Based on this mapping and the location of the Group's sites worldwide', the group decided to pay attention to issues described below. [2019 Registration Document, 13/02/2020; group.renault.com] • Met: How process applies to supply chain: It indicates: 'Under the law on the duty of vigilance [], Groupe Renault uses in particular a mapping of the risks of suppliers with whom an established commercial relationship exists. In terms of risks relating to human rights and fundamental freedoms, health and safety of persons, the environment, ethics and compliance, two areas have been singled out for analysis: risks relating to families of purchases: parts. The families of purchases have been classified according to risks; services. The families of purchases have been included in a nomenclature produced by an external service provider []; renaultgroup.com]  • Met: Public disclosure of the results of HR assessment: The Company indicates 'within the tree major categories of risks laid down by the law (duty of vigilance), the Group has identified several macro-risks concerning the activities that are specific to it: Human rights and fundamental freedoms: discrimination in employment and occupation, infringement
B.2.3	Integrating and acting on human rights risks and impact assessments	0.5	renaultgroup.com  The individual elements of the assessment are met or not as follows:  Score 1  • Met: Action Plans to mitigate risks: The Vigilance Plan indicates different 'actions to mitigate risks and prevent serious infringements' for each risk. For example, regarding the risk 'Slavery and human trafficking', its action is: 'Implement Global Framework Agreement (GFA) of 2013 and ILO Conventions 29 and 105 on the elimination of all forms of forced or compulsory labor'. As for 'Child labor': 'Implement GFA of 2013 and ILO Conventions 138 and 182. The minimum working age at Renault Group is 15, beyond age 15 regulations in each country apply'. It also indicates actions for forced labor, Indecent working conditions, Interfering

Indicator Code	Indicator name	Score (out of 2)	Explanation
			with freedom of association, the right to organize and the right to collective bargaining (people review process involving the HR department to prevent any discrimination against employees who are union members; Renault Group Works Council, comprising 40 members representing 26 countries), Discrimination in recruitment, Discrimination in the workplace (implement a diversity and inclusion plan, implement a people review process), Indecent salary (apply pay scales approved with employee representative bodies), Negative impact on local communities or indigenous peoples. [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Description of how global system applies to supply chain: The Vigilance Plan indicates different 'actions to mitigate risks and prevent serious infringements' for its supply chain: 'In order to prevent serious infringements, under the duty of vigilance, Renault Group: Applies its responsible purchasing policy, a set of requirements vis-à-vis its suppliers and subcontractors (a.); Regards the commitment to comply with its responsible purchasing policy as a decisive criterion when choosing suppliers and subcontractors (b.); Monitors implementation of corrective action plans prepared following supplier site audits (c.); Relies on a dedicated team, reporting to the Purchasing Department (d.). This action plan includes constant progress updates, which will be reported on at a later date'. However, this evidence seems to refer to compliance monitoring rather than proactive action plans deployed to face salient human rights impacts. [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Example of actions decided on at least 1 salient HR issues: Although the Company enumerates actions against different risks, no comprehensive description found in relation to a specific action plan to prevent or mitigate a particular salient impact.  Score 2
			Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: System for tracking or monitor if actions taken are effective: The Company indicates that 'the results of this additional vigilance are regularly assessed and monitored as part of annual follow-up meetings between the Groupe Renault Works Council and the Worldwide Group Works Council'. It also indicates 'The effectiveness of the measures put in place is measured, notably through the number of incidents that may be reported both by the internal professional whistle-blowing system and by the various stakeholders'. [2019 Registration Document, 13/02/2020: group.renault.com]  • Not Met: Lessons learnt from checking system effectiveness: The Vigilance Plan indicates: 'Opportunity for improvement: the risks that suppliers' activities entail for local communities are not yet covered by the requirements in the Group's responsible purchasing policy. This could be addressed in future action plans, monitored by the Duty of Vigilance Steering Committee, which was recently created'. The Duty of Vigilance Steering Committee 'monitors measures on a monthly basis', including those related to Human Rights and fundamental freedoms. However, it is not clear if the creation of this Committee is example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. No further evidence found. [Vigilance Plan, 2022: renaultgroup.com]  Score 2  • Not Met: Meets both requirements under score 1  • Not Met: Involve stakeholders in evaluation of actions taken: The Vigilance Plan indicates: 'A process has been formalized to address whistleblower alerts []. Any alerts are discussed in a specific point during the plenary sessions of the Renault Group Works Council (RGWC). In 2021, a specific update was provided on this subject on November 5 with all the members of the RGWC, which is made up of 40 members representing 26 countries. The RGWC is a forum for
B.2.5	Communicating on human rights impacts	0	Score 1 • Not Met: Provides two examples of comms with stakeholders: The Company provides, in its feedback to CHRB, a document called The Road to Ruin, containing, among other correspondences, a letter for RAID and CAJJ, inquiring about alleged

Indicator Code	Indicator name	Score (out of 2)	Explanation
			abusive working conditions at several large industrial copper and cobalt mines in the Democratic Republic of Congo (DRC) and the 'Response from Renault Group'. RAID is a 'UK-based non-governmental organisation that exposes corporate abuses and human rights violations. [] We have been partnering with civil society actors in Congo for more than 23 years'. The Centre d'Aide Juridico- Judiciaries (CAJI) 'is a Congolese charity based in Kolwezi, which provides legal assistance to workers and others whose human rights have been abused'. It also discloses information on its Cobalt Action Partnership and an article on issues involving aluminium . The latter article indicates: 'Other companies, including Renault, have also begun dialogue with their suppliers about human rights risks in the aluminium industry. In January 2021, Drive Sustainability also wrote to The Aluminum Association, an association of dozens of aluminum producers, in order "to express concern about the situation in Guinea," to solicit information on members' human rights due diligence efforts, and to express support for an ongoing mediation between a Guinean mining company and 13 impacted communities'. However, although indicates different instances of engagement, according to the CHRB methodology, only the letters between RAID/CAJJ and the Company meet the criterion. The Company is expected to provide at least two examples of engagement with different stakeholders, demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. It focuses on how the Companies ensure meaningful information reaches affected stakeholders, how it responds, in communication terms, to issues raised by stakeholders and about their access to those communications.  [The Road to Ruin, 10/09/2021: raid-uk.org] & [Cobalt Action Partnership, 01/10/2021: globalbattery.org]  Score 2  Not Met: Describe challenges to effective comms and how it is working to
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## C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from workers	2	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Channel accessible to all workers: The Company indicates that 'The vigilance plan includes setting up a whistle-blowing mechanism and collecting alerts relating to the existence or realization of risks, established in consultation with the representative unions of the company. In this context, the Group has introduced a professional whistle-blowing system open to employees'. [2019 Registration Document, 13/02/2020: group.renault.com]  Score 2  • Met: Channel is available in all appropriate languages and workers aware: The Company indicates: 'The global whistle-blowing system rolled out in 2018 is available in 14 languages and is operational in almost all countries'. Moreover, 'during 2020, new awareness-raising initiatives were carried out, notably on the Group's intranet, to remind people how the system works'. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Met: Describe how workers in the supply chain have access to grievance mechanism: It indicates: 'The Group has also chosen to open the whistle-blowing system to external and occasional employees, as well as to suppliers and subcontractors with which an established commercial relationship exists, when these activities are related to this relationship'.  • Met: Expect Suppliers to convey expectation to their own suppliers: As indicated above, the Company opens its whistleblowing mechanisms to both suppliers and
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	0	subcontractors.  The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Grievance mechanism for community: The Company indicates that it has 'Procedures for handling complaints from local residents' as a model of engagement with local communities. However, no further details found on how communities can access this system. [2019 Registration Document, 13/02/2020: group.renault.com] & [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Score 2  Not Met: Describes accessibility and local languages and stakeholder awareness: Regarding the WhistleB, the Vigilance Plan indicates: 'This platform is managed by an external service provider and can be accessed at any time, any day of the week, on a professional or personal computer, tablet or smartphone, via the Internet [].

Indicator Code	Indicator name	Score (out of 2)	Explanation
			A telephone line managed by this service provider is also available. This global system is available in 14 languages'. However, it is not clear how the Company ensures all affected external stakeholders at its own operations are made aware of it. [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Communities access mechanism direct or through suppliers  Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mec hanism(s)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Engages users to create or assess system  Not Met: Examples (at least two) of how they do this  Score 2  Not Met: Engages with potential or actual users on the improvement of the mechanism  Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/c hannel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Response timescales and how complainants will be informed: The 2020 Registration Document indicates that its grievance channel 'is managed by an external service provider'. Also, according to its website: 'We may post a reply or follow-up question to you. Once your message has been sent you will receive an ID and a password on the screen. Save these securely. You will need them to log in here again and see any follow-up messages'. Additionally, the Vigilance Plan further explains: 'All reports are examined. Most of the cases are dealt with locally, by the country or subsidiary Ethics and Compliance Correspondent. Reports relating to France and Corporate departments are handled by the Deputy Director for Whistleblowing and the Whistleblowing Committee (CTA), which is made up of seven members and three experts and is chaired by Renault Group's SVP, Audit, Risk, Ethics and Compliance. In other countries, the reports are handled by the Country Ethics and Compliance Committee (CECP), chaired by the Country Director'. However, no details found on the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com] & [We want to do what is right, N/A: report.whistleb.com]  Not Met: Describe support (technical, financial,etc) available for equal access by complainants  Score 2  Not Met: Describe types of outcome to complainant through use of mechanism  Not Met: Escalation to senior/independent level: The Company indicates that 'Each alert is studied, as appropriate, by the director responsible for professional whistle-blowing or the Ethics Contact or the Whistle-blowing Officer. Every year, the Group Ethics and Compliance department presents the Group Ethics and Compliance Committee (CECG) and the Audit, Risks and Compliance Committee (CACR) with a detailed report containing statis
C.5	Prohibition of retaliation for raising complaints or concerns	0	Registration Document, 15/03/2021: renaultgroup.com  The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Public statement prohibiting retaliation: The Vigilance Plan indicates:  'Renault Group prohibits and does not practice any form of retaliation against whistleblowers'. However, although it indicates it is does not practice retaliation, it is not clear it also extends to other stakeholders (including those that represent them), as it is not clear the mechanism is accessible to them. [Vigilance Plan, 2022: renaultgroup.com]  Not Met: Practical measures to prevent retaliation: The Company indicates that 'It guarantees confidentiality of communication and enables the whistle-blower to remain anonymous subject to local law'. However, it is not clear how practical measures are implemented to prevent retaliation in cases where anonymity is not covered by the law. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Score 2  Not Met: Company indicate it will not retaliate against workers/stakeholders  Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Complainants not asked to waive rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
	based judicial and non- judicial grievance mechanisms		Not Met: Company does not require confidentiality provisions     Score 2     Not Met: Will work with state based non judicial mechanisms     Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Describes how remedy has been provided  Not Met: Says how it would provide remedy for victims if no adverse impact identified: The Company indicates in its feedback to CHRB regarding this indicator that there were no recent cases of adverse impact. In this case, the Company is expected to describe the approach it would take to provide or enable timely remedy for victims. No further evidence found.  Score 2  Not Met: Changes to systems, processes and practices to stop similar impact  Not Met: Describe approach to monitoring implementation of agreed remedy  Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows:  Score 1  • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Vigilance Plan indicates that there were '331 reports received via the whistleblowing mechanism worldwide'. However, no further information found including the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [Vigilance Plan, 2022: renaultgroup.com]  • Not Met: How lessons from mechanism improve management system Score 2  • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

## D. Performance: Company Human Rights Practices (25% of Total)

## **D.5 Automotive Manufacturing**

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Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Pays living wage or sets target date: The Vigilance Plan states: 'Renault Group respects internationally recognized workers' rights and complies with all applicable requirements in labor law, in particular as regards salaries, which must be equal to or higher than the minimum pay for work of equal value in the country. The objective is to provide a decent living wage as intended by the ILO'. However, although the Company indicates it has the goal to provide a living wage, no time bound target for paying all workers found. Alternatively, the Company could indicate that it pays all workers a living wage.  Not Met: Describes how living wage determined Score 2  Not Met: Paying living wage  Not Met: Definition of living wage reviewed with unions
D.5.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Discloses living wage requirements in supplier code or contracts: On its Guidelines for Suppliers, the Company encourages suppliers to 'Comply with the laws of each country and region regarding minimum wages, overtime, wage deductions, performance-based pay and other remuneration'. Renault 'request[s] the written commitment of suppliers to the current CSR guidelines'. However, it is not clear the Company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers. [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]  Not Met: Improving living wage practices of suppliers  Score 2  Not Met: Assessment of number affected by payment below living wage  Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Avoids business model pressure on HRs (purchasing practices): The Company states that 'We apply the Renault-Nissan Purchasing Way to maintain the highest standards of impartiality and fairness in all our business transactions'. However, it is not clear the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. No further evidence found. In its feedback to CHRB regarding this datapoint, the Company makes reference to an internal document. However, only publicly available document are accepted, according to CHRB criteria.  [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]  Not Met: Practices adopted to pay suppliers in line with agreed timeframes  Not Met: Review own operations to mitigate negative impact  Score 2  Not Met: Meets all requirements under score 1  Not Met: Examples of how it assessed, addressed and change purchasing practices
D.5.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.  Score 2  Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses the list of its cobalt refiners, including the company name, location [country] and company identity. However, it is not clear these are considered the most significant parts of its supply chain. The Company is expected to disclose the names and specific locations of the direct and indirect suppliers who make up the most significant parts of its supply chain and to explain how it has defined what are the most significant parts of its supply chain. [Cobalt Refiners, N/A: renaultgroup.com]  Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.5.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Does not use child labour: The Company is committed to the abolition of child labour. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: group.renault.com]  • Not Met: Age verification of workers recruited  Score 2  • Not Met: Remediation if children identified
D.5.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Child Labour rules in codes or contracts: In its Guidelines for Suppliers, it is stated: 'Do not permit the employment of minors who do not meet the legal minimum working age of each country and region and in all cases if minors are below the age of 15, in accordance with Renault-Nissan policy'. Renault 'request[s] the written commitment of suppliers to the current CSR guidelines'. However, no details found of requirement to age verification of workers recruited and remediation programmes.  [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]  Not Met: How working with suppliers on child labour Score 2  Not Met: Assessement of number affected by child labour in supply chain  Not Met: Analysis of trends in progress made
D.5.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Job seekers and workers do not pay recruitment fee  Not Met: Commits to fully reimbursing if they have paid  Score 2  Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters

<b>Indicator Code</b>	Indicator name	Score (out of 2)	Explanation
D.5.5.b	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Recruitment		Not Met: Debt and fees rules in codes or contracts: The Company commits to the
	fees and costs		'elimination of all forms of forced or compulsory labour' and it expects suppliers to
	(in the supply		do the same. However, it is not clear the Company prohibits suppliers and any third-party recruitment intermediaries from imposing financial burdens on job
	chain)	0	seekers and workers by collecting recruitment fees or related costs. No evidence
			found. [2013 Global Framework Agreement on social, societal and environmental
			responsibility, 02/07/2013: group.renault.com]
			Not Met: How working with suppliers on debt & fees
			Score 2
			Not Met: Assessment of the number affected by payment of recruitment fees
			Not Met: Analysis of trends in progress made
D.5.5.c	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Wage practices		Not Met: Pays workers in full and on time: Although the Company is committed
	(in own		to the elimination of all forms of forced or compulsory labour and 'the Renault
	production or		Group recognises the principle of fair remuneration and complies with the regulations of convention no. 100 of the ILO on equal pay for work of equal value',
	manufacturing		no evidence found indicating that it pays workers regularly, in full and on time.
	operations)		[2013 Global Framework Agreement on social, societal and environmental
			responsibility, 02/07/2013: group.renault.com]
			Not Met: Payslips show any legitimate deductions: Although the Company is
		0	committed to the elimination of all forms of forced or compulsory labour and 'the
			Renault Group recognises the principle of fair remuneration and complies with the
			regulations of convention no. 100 of the ILO on equal pay for work of equal value',
			no evidence found indicating indicates that all workers receive a payslip with their
			wages explaining any legitimate deductions. [2013 Global Framework Agreement
			on social, societal and environmental responsibility, 02/07/2013:
			group.renault.com]
			Score 2
			Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.d	Prohibition of		The individual elements of the assessment are met or not as follows:
D.5.5.0			Score 1
	forced labour:		Not Met: Requirement for suppliers to pay workers in full and on time in codes or
	Wage practices		contracts
	(in the supply	0	Not Met: How working with supply chain to pay workers regularly and on time
	chain)		Score 2
			Not Met: Assessment of the number affected by failure to pay directly
			Not Met: Provides analysis of trends demonstrating progress
D.5.5.e	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Restrictions on		Not Met: Does not retain documents or restrict movement: Although the
	workers (in		Company is committed to the elimination of all forms of forced or compulsory labour, no evidence found indicating it does not retain workers' personal
	own production		documents or restrict workers' freedom of movement or require workers to use
	or	0	Company provided accommodation. [2013 Global Framework Agreement on social,
	manufacturing		societal and environmental responsibility, 02/07/2013: group.renault.com] & [2019]
	operations)		Registration Document, 13/02/2020: group.renault.com]
			Score 2
			Not Met: How these practices are monitored for agencies, labour brokers or
			recruiters
D.5.5.f	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Restrictions on		Not Met: Free movement rules in codes or contracts: The Guidelines for Suppliers     indicates IPs and practice for suppliers.
	workers (in the		indicates: 'Do not practice forced labor. Guarantee that all labor is voluntary and
	supply chain)		that employees are free to leave their jobs'. Renault 'request[s] the written
			commitment of suppliers to the current CSR guidelines'. However, no evidence found on its requirements that the company prohibits suppliers from retaining
		0	workers' personal documents or restricting workers' freedom of movement or
			requiring workers to use company provided accommodation. [Guidelines for
			Suppliers Renault-Nissan, 12/2015: group.renault.com
			Not Met: How working with suppliers on free movement
			Score 2
			Not Met: Assessment of the number affected by retaining docs or restricting
			movement
			Not Met: Provides analysis of trends demonstrating progress

<b>Indicator Code</b>	Indicator name	Score (out of 2)	Explanation
D.5.6.a	Freedom of		The individual elements of the assessment are met or not as follows:
	association and collective bargaining (in own production or manufacturing operations)	2	• Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company indicates that 'Groupe Renault ensures that employees are represented across all Group entities by elected employees representative or labor union members. It reaffirms its commitment to respect the right of freedom of association, in terms of the freedom to join and hold office in a labor union'. In addition, the Company has a Global Framework Agreement in place. [2019
	operations)		Registration Document, 13/02/2020: <a href="mailto:group.renault.com">group.renault.com</a> ]  • Met: Discloses % total direct operations covered by collective CB agreements: The Company indicates: '88.45% of the Group's employees are covered by a collective bargaining agreement at branch and/or company level'. [2020 Universal Registration Document, 15/03/2021: <a href="mailto:renaultgroup.com">renaultgroup.com</a> ] Score 2  • Met: Meets both requirements under score 1: Se above.
D.5.6.b	Freedom of association and		The individual elements of the assessment are met or not as follows: Score 1
	collective bargaining (in the supply chain)	0	Not Met: FoA & CB rules in codes or contracts: In its Guidelines for Suppliers, it is stated: 'Undertake sincere consultation and dialogue with employees or their representatives. Recognize employees' right to associate or not associate based on the laws of each country and region of operation'. Renault 'request[s] the written commitment of suppliers to the current CSR guidelines'. However, no description found including the prohibition of intimidation, harassment, retaliation and violence against union members and union representatives. [Guidelines for Suppliers Renault-Nissan, 12/2015: <a href="mailto:group.renault.com">group.renault.com</a> ]  Not Met: How working with suppliers on FoA and CB
			Score 2 • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP
D.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	• Not Met: Provides analysis of trends demonstrating progress  The individual elements of the assessment are met or not as follows:  Score 1  • Met: Describes process to identify H&S risks and impacts: The Company indicates:  'DHSEE [Health, Safety, Ergonomics and the Environment Department] engaged in an intense worldwide risk evaluation activity by visiting sites and performing wall to wall inspections with the aim of identifying key areas of risk. [] In 2019, the DHSEE developed Mandatory Rules and Key Requirements to support health, environment, ergonomics, fire and projects. These rules were to be tested on various sites throughout 2020. This was only partially achieved, due to the pandemic (COVID-19) taking priority and the intense involvement of the DHSEE in supporting the COVID-19 exposure control measures and business continuity.  Simultaneously the number of physical safety 10MR/74KR audits and coaching carried out during 2020 by DHSEE was severely impacted [] Nevertheless, capabilities to conduct remote audits and coaching were also carried out successfully using live communication tools. At the same time, the sites were trained so that they will be able to carry out self-assessments'. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The workplace accidents ratio for 2020 was 1.08 [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Not Met: Discloses Fatalities for last reporting period: The Company indicates that 'Regrettably, fatalities are not unknown'. However, the specific figures for fatality were not found. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Met: Occupational disease rate for last reporting period: The occupational illness for the 2020 was 1.27. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  • Met: Occupational disease rate for last reporting period: The occupational illness for the 2020 was 1.27. [2020 Un

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: Met targets or explain why not or what is doing to improve management systems: The Company has a comprehensive health and safety system which includes risk mapping, procedures for regular assessments, risk mitigation actions, device for monitoring the measures and their effectiveness. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]
D.5.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Sets out clear Health and Safety requirements: In its Guidelines for Suppliers, the Company calls its suppliers to 'Make the health and safety of workers the top priority and make every effort to prevent occupational accidents'. Renault 'request[s] the written commitment of suppliers to the current CSR guidelines'. However, no description of health & safety requirements in its contractual arrangements with its suppliers or supplier code of conduct was found. [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]  Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period  Not Met: Occupational disease rates for the last reporting period  Not Met: Occupational disease rates for the last reporting period  Not Met: How working with suppliers on H&S: The Company indicates that 'The audits showed that in 2018, for all reports produced by external auditors, of noncompliance was identified in the areas of health and safety and working conditions. The main areas of non-compliance were fire detection systems, electrical installations, lack of access to certain emergency exits and non-compliance with minimum wage legislation'. However, it is not clear how it engages with suppliers to improve their practices in relation to health and safety. No further evidence found on its latest Registration Document. [2019 Registration Document, 13/02/2020: group.renault.com] & [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Not Met: Assessment of the number affected by H&S issues in the SP  Not Met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Process to stop harassment and violence against women: The 2013 Global Framework Agreement states that it 'disavow any form of violence at work, harassment in all its forms, in particular sexual or moral, or discrimination with regard to employees. Renault Group commits to taking suitable actions as quickly as possible, in particular via the Ethics Committee and the Human Resources function, to prevent, stop and sanction any unacceptable conduct. All employees of Renault Group have access to a professional alert system that guarantees the confidentiality and the protection of whistleblowers acting in good faith and selflessly'. Moreover, the 2019 Global Framework, which complements the 2013 GFA reaffirms: 'The signatories disavow any form of violence at work, harassment in all its forms, in particular sexual or moral, or discrimination with regard to employees'. Additionally, the webpage section Promoting Diversity indicates: 'In April 2021, Renault Group created a Diversity and Inclusion division within Human Resources. The challenge: to work for diversity of profiles for more wealth and performance and to promote inclusion within the teams. The first priority set by the Diversity and Inclusion Directorate is that of gender with the ambition of becoming a reference employer for women. Within this framework, it deploys a strategy based on 4 pillars: Ensure fair and respectful treatment of all, Promote an inclusive work environment, Facilitating the integration and development of women in business, And finally increase the representation of women at all levels, in all trades and in all countries where the company is present. In 2030, Renault Group targets 30% of women in management positions'. However, it is not clear its processes it has in place to prohibit harassment, intimidation and violence against women specifically. [2013 Global Framework Agreement on social, societal and environmental responsibility, 02/07/2013: grou

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Working conditions take account of gender: The 2013 Global  Formula of American Action that IT is Brown to Grown has included a configuration.
			Framework Agreement states that 'The Renault Group has implemented specific
			measures regarding the position of women in the company, which has resulted in changes to its HR processes in terms of recruitment and career management and in
			the development of an international network of women'. The 2021 Company's
			Modern Slavery Statement indicates: 'Groupe Renault's ambition is to be the best
			employer for women in the automotive industry. It has three objectives: become a
			benchmark employer for women; neutralize the gender pay gap by 2025; maintain
			our leadership in gender diversity among carmakers and increase the presence of
			women in key positions'. In its feedback to CHRB, the Company provided additional
			comments related to maternity leave compensation, however, no further evidence of the compensation scheme found in any publicly available source, or evidence
			related to how it takes into account differential impacts on women and men
			working conditions, including to reproductive health. [2013 Global Framework
			Agreement on social, societal and environmental responsibility, 02/07/2013:
			group.renault.com] & [2020 Universal Registration Document, 15/03/2021:
			renaultgroup.com
			• Met: Measures and steps to address gender pay gap at all levels of employment:
			Gender pay-gap is one of the indicators of the fixed compensation of the CEO. The Company has the objective to: 'neutralize the gender pay gap by 2025'. Also: 'In
			order to promote gender diversity, in 2010 Renault launched WoMen@Renault, a
			comprehensive plan for improving the representation of women at all levels of the
			Company. This system is based on two complementary components: a Human
			Resources plan and an internal social network'. [2020 Universal Registration
			Document, 15/03/2021: renaultgroup.com
			Score 2
			<ul> <li>Not Met: Meet all requirements under score 1</li> <li>Met: Provides analysis of trends demonstrating closing gender pay gap: The</li> </ul>
			Company indicates: 'specific actions in each country led to a reduction in the
			average wage gap between men and women. The target of an average gap of 4.1%
			has been exceeded to reach a rate of 2.8% by the end of 2020'. [2020 Universal
			Registration Document, 15/03/2021: renaultgroup.com
D.5.8.b	Women's rights		The individual elements of the assessment are met or not as follows:
	(in the supply		Score 1
	chain)		• Not Met: Women's rights in codes or contracts: In its Guidelines for Suppliers, the Company calls its suppliers to 'Do not discriminate in any aspect of employment
			(recruitment, employment, promotion, wages, dismissal, retirement, assignment of
			duties, disciplinary measures, etc.) on the basis of [] gender'. Also, 'Do not allow
			any form of harassment in the workplace on the basis of () gender'. Renault
			'request[s] the written commitment of suppliers to the current CSR guidelines'.
			However, no evidence found of provisions including of equal pay for equal work,
			measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among
			women workers. In its High-Level Commitment for Sustainable Natural Rubber, the
			Company commits to: 'complies with internationally recognized labor rights, the
			ILO fundamental Conventions and all applicable laws on workers' rights, and
			specifically regarding: [] no discrimination based on gender, age, ethnicity, sexual
			orientation, faith, national origin or disability (ILO Conventions 100 & 111), []
		0	gender equity´. However, it is not clear the Company requires suppliers to provide equal pay for equal work, introduce measures to ensure equal opportunities
			throughout all levels of employment and to eliminate health and safety concerns
			that are particularly prevalent among women workers in its contractual
			arrangements with suppliers or supplier code of conduct. [2013 Global Framework
			Agreement on social, societal and environmental responsibility, 02/07/2013:
			group.renault.com] & [High-Level Commitment for Sustainable Natural Rubber,
			N/A: renaultgroup.com
			Not Met: How working with suppliers on women's rights Score 2
			Not Met: Assessment on the number affected by discrimination or unsafe
			working conditions: The Company indicates in its feedback to CHRB that in 2021, no
			alert concerning discrimination or unsafe working conditions was emitted in our
			grievance mechanism. However, no further evidence found of its assessment of the
			number affected by (scope of) discrimination or unsafe working conditions for
			women in its supply chain. Moreover, the evidence has to be found in a publicly
			<ul><li>available document.</li><li>Not Met: Provide analysis of trends in progress made</li></ul>
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Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.9.a	Working hours		The individual elements of the assessment are met or not as follows:
	(in own		Score 1
	production or		Not Met: Respects max hours, min breaks and rest periods in its own operations:
	manufacturing		The Company indicates, in its 2013 Global Framework Agreement on social, societal
	operations)		and environmental responsibility, that 'The Renault Group agrees that the duration of work should not exceed that laid down in national legislation or the collective
			agreements of the country concerned'. Moreover, the Vigilance Plan indicates:
			'Renault Group reaffirms its commitment to strictly respecting policies on the
			organization of working time and rest time, as provided in national legislation and
			in local agreements arising from social dialogue. Renault Group commits in
			particular to respecting each employee's right to choose whether or not to connect
			outside his or her usual working hours and during his or her periods of leave.  During their leave, they are not required to reply to any emails or telephone calls
			they may receive, whatever they may be, and only send emails or make telephone
			calls in exceptional emergencies (in particular emergencies that impact the safety
			of employees and/or customers)´. However, no evidence found indicating that it
			respects the ILO conventions on working hours, or specific indication of a maximum
		0	of 48 hours for a regular working week where local legislation is not more
			restrictive, and minimum breaks. In its feedback to CHRB, the Company also makes reference to its Supplier Code of Conduct, however, it seems to be an internal
			document and CHRB only accepts documents which are publicly available. [2013
			Global Framework Agreement on social, societal and environmental responsibility,
			02/07/2013: group.renault.com] & [Vigilance Plan, 2022: renaultgroup.com]
			Not Met: Assesses ability to comply with its commitments when allocating
			work/targets: In the context of balancing telework and on-site work due to the COVID situation, the Company indicates: 'As early as mid-2020, the company
			sought to draw lessons from this unprecedented period. Through surveys and
			working groups, the company noted the enthusiasm of its employees for the
			perpetuation of hybrid working methods, combining on-site and telework'.
			However, no evidence found that the Company assesses the ability of workers
			within its factories to comply with its commitments to respect working hours and
			minimum breaks and rest periods when allocating work or setting targets. [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]
			Score 2
			Not Met: Meets both requirements under score 1
			Not Met: How it implements and checks this in its operations
D.5.9.b	Working hours		The individual elements of the assessment are met or not as follows:
	(in the supply		Score 1
	chain)		<ul> <li>Not Met: Working hours in codes or contracts: In its Guidelines for Suppliers, the Company calls its suppliers to 'Comply with the laws of each country and region</li> </ul>
			regarding the setting of employees' working hours (including overtime) and the
			granting of scheduled days off and paid annual vacation time'. Renault 'request[s]
			the written commitment of suppliers to the current CSR guidelines'. However, no
			evidence found of these requirement to respect the ILO conventions on working
			hours' or, in addition to days off, indicating maximum of 48 hours for a regular working week (excluding overtime) unless local legislation is more restrictive.
			[Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]
			Not Met: How working with suppliers on working hours: The Vigilance Plan
		0	discloses information on its regular assessment of suppliers as well as the
			'Monitoring of corrective action plans following audits at supplier and
			subcontractor sites' and its whistleblowing mechanism. However, no description
			found of how it proactively works with suppliers specifically to improve their practices in relation to working hours. [Vigilance Plan, 2022: renaultgroup.com]
			Score 2
			Not Met: Assessment of number affected by excessive working hours: The
			Company indicates in its feedback to CHRB that in 2021, no alert concerning
			working hours was emitted in our grievance mechanism. However, no further
			evidence found of its assessment of the number affected by (scope of) excessive
			working hours in its supply chain. Moreover, the evidence has to be found in a publicly available document.
			Not Met: Provide analysis of trends in progress made
<u> </u>	I	<u>I</u>	

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.10.a	Responsible		The individual elements of the assessment are met or not as follows:
	Mineral		Score 1
	Sourcing:		• Not Met: Due diligence in accordance with OECD Guidance in supplier contracts:
	Arrangements		The Company indicates it requires suppliers to 'Comply with applicable laws
	with suppliers		regarding procurement of responsible minerals and proceed with due diligence for
			conflict-affected and high risks mineral, such as Tungsten, Tantalum, Tin, and Gold
	and		Additionally, regarding its responsible procurement of cobalt it states: 'Based on
	smelters/refine		the guidelines of the OECD, suppliers shall specifically: Develop an appropriate
	rs in the		management system to conduct due diligence in the supply-chain to determine
	mineral		whether cobalt originates from conflict-affected or high-risk areas. Develop due
	resource supply		diligence policies and require tier-one suppliers to (i) adopt corresponding due
	chains		diligence policies and (ii) request the same from their suppliers down to the level of
			extraction of cobalt. Identify the risks by mapping the supply-chain and take
		0	appropriate steps to mitigate themParticipate in and complete third-party
			verifications or audits at owned facilities at the request of Renault. Report on
			supply-chain due diligence'. However, it is not clear suppliers are required to
			conduct due diligence in accordance with the OECD Guidance for all 3TG.
			Moreover, it does not indicate whether the Company incorporates this
			requirement in its contractual agreements with suppliers. The Company has provided feedback to CHRB regarding this indicator. However, the comments
			ļ',
			provided could not be found in publicly available sources. It has also made reference to a webpage, however, no evidence to meet the requirements of this
			indicator was found. [Procurement of Cobalt and Minerals Policy, N/A:
			group.renault.com
			Not Met: Works with smelters/refiners and suppliers to build capacity
			Score 2
			Not Met: Contractual requirement to disclosure smelter/refiner information
			Not Met: Contractual requirement covers all minerals
D.5.10.b	Responsible		The individual elements of the assessment are met or not as follows:
	Mineral		Score 1
	Sourcing: Risk		• Not Met: Risk identification and disclosure in line with OECD Guidance: The 2020
	identification in		Universal Registration Document indicates that it 'is particularly vigilant as regards
	mineral supply		to the origin of certain minerals and materials, for which risk mapping is also
			carried out. In the light of Groupe Renault's commitment to human rights and
	chain		fundamental freedoms, and particularly the fight against child labour in its supply
			chains of minerals and materials from high-risk countries, Groupe Renault works in
			priority since 2017 with the cobalt sector, as this mineral is used in electric
			batteries. The Group selected a specialist audit firm in this sector to fully map its
			supply chain and perform on-site audits for the identified stakeholders. Moreover,
			according to its website section 'Responsible Purchasing', the Company 'maps its
			supply chain [] to enable it to rank its supplier sites in order of extra-financial risk.
			A programme whereby external firms audit high-risk supplier sites is then
			implemented. [] Renault Group produces a map of material risks based on CSR
		0	criteria. This makes it possible to prioritise medium-term actions to be undertaken for sensitive supply chains. Actions are taken in compliance with the OECD
			Guidelines on Due Diligence for Responsible Supply Chains of Minerals from Conflict and High Risk Areas: Third Edition'. The Vigilance Plan discloses a list of the
			risks identified in the Vigilance Plan', they include: Human Rights risks, health and
			safety risks, environment risks. However, it is not clear if these also cover explicitly
			3TG since it seems to focus in one mineral, cobalt, and suppliers generally. [2020]
			Universal Registration Document, 15/03/2021: renaultgroup.com] & [Responsible
			Purchasing (web), N/A: renaultgroup.com]
			Not Met: Identification of smelter/refiners and OECD Guidance
			Score 2
			Not Met: Discloses smelters/refiners judged in line with OECD Guidance: The
			company discloses its list of cobalt refiners. It discloses the locations. It also
			indicates, in its webpage section Responsible Purchasing that: 'Every year, more
			than 80% of Renault Group's purchase demands are covered by an extra-financial
			assessment in the domains of working conditions and basic social rights, regulatory
			and ethical compliance, environment and responsible supply chain management'.
			The Company has also indicated, in its feedback to CHRB, the following: 'Work is
			under way concerning other battery minerals, to prepare upcoming EU Regulation
			(2023)'. However, no list of all qualified smelters/refiners in its supply chain that it
			has independently judged to conform to the due diligence processes covered by
			the OECD Guidance found, including 3TG. The Company has provided an additional
			source to this indicator, in its feedback, however key information was already in
			use. [Cobalt Refiners, N/A: renaultgroup.com] & [Vigilance Plan, 2022:
			renaultgroup.com]

<b>Indicator Code</b>	Indicator name	Score (out of 2)	Explanation
			Not Met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk management in the mineral supply chain	Score (out of 2)	•
			degree of concentration of production (number of producing countries), nature and probability of ESG risks in the value chain, Study of the financial impacts according to different scenarios of price increase or, depending on the material, supply disruption. A dedicated team monitors and develops tools internally and in partnership with European and national authorities and collaborative platforms'. However, it is not clear its steps taken to manage and respond to risks in its mineral supply chain with respect to at least 3TG. [Responsible Purchasing (web), N/A: renaultgroup.com] & [2020 Universal Registration Document, 15/03/2021: renaultgroup.com]  Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time  Not Met: Disclose better risk prevention/mitigation over time  Score 2  Not Met: Suppliers and stakeholders engaged in risk management strategy: The Company indicates, in its feedback to CHRB, that it is a member of the Global Battery Alliance, in which the Company LG is also a member. The Company indicates that LG is a supplier. However, it is not clear how it engages with suppliers and affected stakeholders to agree on its strategy for risk management, including 3TG. [Global Battery Alliance (web), N/A: globalbattery.org]
D.5.11	Responsible Materials Sourcing	0	<ul> <li>Not Met: Risk management and response processes cover all minerals</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Due diligence for raw materials in supplier code/contracts: In its</li> <li>Guidelines for Suppliers, the Company calls its suppliers to 'Exercise care regarding the impact of corporate activity and parts production, including raw material acquisition on the ecosystem'. Renault 'request[s] the written commitment of suppliers to the current CSR guidelines'. However, it is not clear it incorporates requirements to conduct due diligence for raw materials in its contractual arrangements with suppliers or within its supplier code of conduct. The Company indicates in its feedback to CHRB that increasing share of raw materials for EV batteries are sourced through direct contracts, which include clauses about ESG performance. However, no evidence of these contracts was found in the public domain. The Company has also made reference to a webpage, however, no further information was found in the webpage. [Guidelines for Suppliers Renault-Nissan, 12/2015: group.renault.com]</li> <li>Not Met: Works with suppliers to build capacity in risk assessment and due diligence</li> <li>Score 2</li> <li>Not Met: Meets all requirements under score 1</li> <li>Not Met: Identify the sources of high-risk raw materials in its supply chain</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		Area: Environmental rights; land rights
			Headline: Renault among others accused of abuses of Aluminium supply chains
			• Story: On July 22, 2021, Human Rights Watch and Inclusive Development International said in a report that Automobile companies need to do more to address abuses in their aluminium supply chains and the bauxite mines they source from. Car manufacturers used nearly a fifth of all aluminium consumed worldwide in 2019 and they are forecast to double their aluminium consumption by 2050 as they transition to electric vehicles.
			In its report the Human Rights Watch and Inclusive Development International describes the global supply chains that connect car manufacturers to mines, refineries, and smelters from countries including Guinea, Ghana, Brazil, China, Malaysia, and Australia. Based on meetings and correspondence with nine major car companies — Renault among others (BMW, Daimler, Ford, General Motors, Groupe PSA (now part of Stellantis), Toyota, Volkswagen, and Volvo) — Human Rights Watch and Inclusive Development International assessed how the auto industry addresses the human rights impacts of aluminium production, from the destruction of farmland and damage to water sources caused by mines and refineries to the significant carbon emissions from aluminium smelting. Although car companies' knowledge of aluminium supply chains varies, none of the nine companies that responded to Human Rights Watch and Inclusive Development International had, prior to being contacted for this report, mapped their aluminium supply chain to understand the human rights risks within it.
			The report also alleged despite many of the world's leading car companies have publicly committed to addressing human rights abuses in their supply chains, they have done little to evaluate and address the human rights impact of aluminium production. They have instead prioritized supply chain due diligence for other materials central to electric vehicles, such as the cobalt needed for electric batteries. Because they involve surface level mining, bauxite mines take up a large area, often destroying farmland that underpins the livelihoods of local communities. Bauxite mines can also have a devastating impact on rivers, streams, and groundwater sources that communities rely upon for household consumption and irrigation.
			[Human Rights Watch, 22/07/2021, "Aluminum: The Car Industry's Blind Spot": hrw.org]
E(1).1	The company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Public response: Considering the Human Rights Watch and Inclusive  Development International's report, Renault have begun dialogue with their suppliers about human rights risks in the aluminium industry. In addition, the company have started to map out their aluminium supply chains and analyze the human rights risks within them [Human Rights Watch, 22/07/2021: <a href="https://rww.org">hrw.org</a> ] Score 2  • Not Met: Detailed response: The company responded in very general terms and
E(1).2	The company		did not address the allegation in detail.  The individual elements of the assessment are met or not as follows:  Score 1
	has investigated and taken appropriate action	0.5	Not Met: Engaged with stakeholders: The company engaged with Human Rights Watch and Inclusive Development International in the compilation of the report. However, none of those organisations can be considered to be a legitimate representatives of the affected stakeholders. Feedback the company provided to CHRB on this indicator was not material for the assessment.  Not Met: Identified cause Score 2  Met: Identified and implemented improvements: Considering the Human Rights
			Watch and Inclusive Development International's report, Renault have begun dialogue with their suppliers about human rights risks in the aluminium industry. In addition, the company have started to map out their aluminium supply chains and analyze the human rights risks within them [Human Rights Watch, 22/07/2021: <a href="https://doi.org/line.gov/hrw.org/">hrw.org/</a>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies.
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Provided remedy  Not Met: Evidence for lack of Impact or link  Score 2  Not Met: Remedy satisfactory to stakeholders  Not Met: Remedy delivered  Not Met: Independent remedy process used
E(2).0	Serious		Area: Security of persons, indigenous rights, environmental rights
	allegation No 2		Headline: Nissan among companies blamed by NGOs for the murder of activist in Morelos, Mexico
			• Story: On March 20, 2019, the press reported that more than 50 international organisations blamed Nissan and other companies involved in the Thermoelectric project in Morelos, for the death of indigenous activist and community organizer Samir Flores, who was opposed to the project and was shot on February 20, 2019, days before the consultation vote.
			Local communities reportedly raised concerns about consequences of pollution and over-exploitation of water resources. The project is allegedly carried out by several multinationals, including Nissan, Saint-Gobain, Elecnor, Abengoa, Enagas and Bonatti. The Proyecto Integral Morelos (PIM) included the construction of two thermoelectric plants, and the installation of a 160km gas pipeline, which would pass by an active volcano as well as over 60 villages in Tlaxcala, Puebla and Morelos, that were reportedly opposed to the project because of worries that the plant would pollute the water and fears over the pipeline being too close to the volcano. Nissan allegedly funded the construction of the pipeline, in order to use the gas at its own plants nearby. The organisations reportedly stated that they hold the companies involved in the project accountable and ask them to leave the project immediately until the investigation is done. Nissan is partially owned by Renault.  [Des Informémonos, 28/03/2019, "Organizaciones internacionales responsabilizan a empresas europeas del PIM por el asesinato de Samir Flores":  desinformemonos.org] [I Observatoire des multinationales, 04/03/2019, "Mexique: assassinat d'un leader indigène opposé à un projet gazier impliquant des multinationales européennes": multinationales.org] [Business and Human Rights Resource Centre - 08/04/2019, "México: ONG exige se aclare la posible participación de empresas españolas en el asesinato de Samir Flores": business-
			humanrights.org] [Tercera Información, 20/03/2019, "Se exige que se aclare el papel de empresas españolas en el asesinato de Sam
E(2).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows:  Score 1  • Not Met: Public response  Score 2  • Not Met: Detailed response
E(2).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Engaged with stakeholders  Not Met: Identified cause  Score 2  Not Met: Identified and implemented improvements  Not Met: Stakeholder input to steps taken
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Provided remedy  Not Met: Evidence for lack of Impact or link  Score 2  Not Met: Remedy satisfactory to stakeholders  Not Met: Remedy delivered  Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		Area: Health and Safety      Headline: COVID-19: Renault-Nissan and Hyundai Motors criticised over working conditions amid the spread of Coronavirus in India

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Story: On May 24, 2021, press sources reported that workers at Renault-Nissan's and Hyundai Motor's plant in Tamil Nadu are alleged that Covid-19 safety protocols have not been followed at the unit near Chennai and said to go on strike. A workers' union at Renault-Nissan's Tamil Nadu plant, which employs over 8,000 workers, had warned of a strike from if their COVID-related safety demands were not met. Four workers have died and over 400 employees have contracted the virus in 2021, said the union.
			On June 22, 2021, press sources reported that Madras high court asked the Tamil Nadu state government to inspect a Renault-Nissan plant on July 3, 2021, to check whether social distancing norms are being followed. According to the press, the Renault-Nissan workers union petitioned the high court in May 2021, seeking to halt operations, saying that social distancing norms were being flouted and Company-provided health benefits were outweighed by the risk to their lives. A lawyer for Renault-Nissan India told the court the company would implement guidelines issued by officials from the state's Directorate of Industrial Safety and Health (DISH) ahead of the inspection in July 2021. The Renault-Nissan factory will be inspected as unions at other automakers have not raised objections.
			The call for an inspection from the Madras High Court follows a review of Ford, Hyundai and Renault-Nissan plants by Tamil Nadu state officials last week, which said the nature of work in assembly lines posed "challenges in maintaining social distancing".  [The Economic Times, 24/05/2021, "Renault-Nissan and Hyundai face shutdowns in India over workers' COVID fears": economictimes.indiatimes.com]  [Thehansindia, 26/05/2021, "Hyundai decides to temporarily close its plant in Chennai for 5 days, when workers began Protesting over the Covid-19 scare": thehansindia.com] [Timesofindia, 22/06/2021, "Madras high court calls for probe of Renault-Nissan plant's": timesofindia.indiatimes.com] [Business and Human Rights Resource Centre, 27/06/2021, "India: Employees at Renault-Nissan plant allege safety concerns related to COVID-
E(3).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Public response: The company stated: "Nissan continues to hold the health and safety of employees at the heart of our operations. We had carefully resumed operations of the plant, after a brief pause due to the challenges posed by the recent increase in COVID19 cases in India, with an even more vigorous and transparent people first approach. We have already implemented changes in the production lines, as per previous agreements regarding employee safety with the union, while also acting on the recommendations of the State Government following recent inspections. We value the collaboration with the safety experts, doctors, workers and Union in enhancing the COVID safety protocol at the plant. These measures are in addition to all those we have been implementing towards employee well-being since the beginning of the pandemic. We will continue observing all safety protocols mandated by the government authorities, working with the government stakeholders and coordinating with the union to reach an amicable and mutually-beneficial resolution for all. We will continue to closely monitor the development and will continue to take all necessary steps to ensure the safety & well-being of our employees". [Business and Human Rights Resource Centre, 27/06/2021, "India: Employees at Renault-Nissan plant allege safety concerns related to COVID-19": business-humanrights.org]
			Score 2 • Not Met: Detailed response: The company stated: "Nissan continues to hold the health and safety of employees at the heart of our operations. We had carefully resumed operations of the plant, after a brief pause due to the challenges posed by the recent increase in COVID19 cases in India, with an even more vigorous and transparent people first approach. We have already implemented changes in the production lines, as per previous agreements regarding employee safety with the union, while also acting on the recommendations of the State Government following recent inspections. We value the collaboration with the safety experts, doctors, workers and Union in enhancing the COVID safety protocol at the plant. These measures are in addition to all those we have been implementing towards employee well-being since the beginning of the pandemic. We will continue observing all safety protocols mandated by the government authorities, working with the government stakeholders and coordinating with the union to reach an amicable and mutually-beneficial resolution for all. We will continue to closely

Indicator Code	Indicator name	Score (out of 2)	Explanation
			monitor the development and will continue to take all necessary steps to ensure the safety & well-being of our employees".  The company response outlines policies and steps taken after the allegation emerged. However, the engagement with the actual content of the allegation (death of four workers etc.) was addressed only in very general terms. [Business and Human Rights Resource Centre, 27/06/2021: <a href="mailto:business-humanrights.org">business-humanrights.org</a> ]
E(3).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Engaged with stakeholders: The company stated: "We will continue observing all safety protocols mandated by the government authorities, working with the government stakeholders and coordinating with the union to reach an amicable and mutually-beneficial resolution for all". [Business and Human Rights Resource Centre, 27/06/2021: business-humanrights.org]  • Not Met: Identified cause: The company stated: "We will continue to closely monitor the development and will continue to take all necessary steps to ensure the safety & well-being of our employees". However, the company does not present investigative results on the underlying causes of the events. In particular the reasons for the initial spread of COVID-19 related infections and deaths. [Business and Human Rights Resource Centre, 27/06/2021: business-humanrights.org]  Score 2  • Met: Identified and implemented improvements: Renault-Nissan Automotive India Pvt. Ldt. (RNAIPL) claims to have implemented structured changes in its transport and canteen systems, lowering occupancy to 50%. It also removed fingerprint scanners for the biometric attendance system, and introduced a "COVID-19 key' to avoid touching any buttons, doors or other common surface areas. RNAIPL's plan includes practicing social distancing through markings that have been laid out in all areas, sanitising in its vicinity conveyance and production vehicles, using foot-operated pedal system for water and sanitiser dispensers, disposing used masks in designated yellow bins only, keeping the windows and doors open for fresh air and ventilation and encouraging support functions for workers to work from home. In addition, to strengthen the COVID-19 safety initiatives and to increase awareness, RNAIPL has introduced compulsory online training modules and on-the-ground trainings with certified trainers on health & safety SOPs for all its employees. [Nissan Motor Corporation, 27/05/2021, "Nissan India contributes over
E(3).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Provided remedy: To strengthen the COVID-19 safety initiatives and to increase awareness, RNAIPL has introduced compulsory online training modules and on-the-ground trainings with certified trainers on health & safety SOPs for all its employees. An emergency response team of COVID-19 marshals has also been set up at RNAIPL to monitor, address and ensure the safety of its employees. However, the company has not taken steps to remediate past rights violations.  [Nissan Motor Corporation, 27/05/2021: india.nissanmotornews.com]  Not Met: Evidence for lack of Impact or link  Score 2  Not Met: Remedy satisfactory to stakeholders: The company has not taken steps to remediate past rights violations.  Not Met: Remedy delivered: The company has not taken steps to remediate past rights violations. [Business and Human Rights Resource Centre, 27/06/2021: business-humanrights.org]  Not Met: Independent remedy process used

#### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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