

ANNEX

**SPECIFIC PROVISIONS
OF THE MOBILIZE FINANCIAL SERVICES GROUPE
TO THE RENAULT GROUP
ANTI-CORRUPTION CODE OF CONDUCT**

Mobilize Financial Services Group reaffirms their strong commitment to a proactive policy for preventing and detecting corruption and influence peddling. As the financial partner of Renault Group brands, as well as Nissan and Mitsubishi brands, Mobilize Financial Services (Mobilize FS) offers financing, savings, insurance, and service products.

AS a banking institution under the supervision of the European Central Bank since 2016, Mobilize FS is subject to the strictest banking regulations. The Group acts with integrity and transparency, values that are at the heart of its identity.

As part of risk prevention and the protection of the interests of the Group, Mobilize FS aligns their requirements with the anticorruption framework of their parent company, in all the countries where they operate in. In accordance with the Sapin II law, Mobilize FS is aligned with Renault Group framework and applies a “**zero-tolerance**” policy toward any unethical behaviours.

The Code of Ethics, which forms the cornerstone of Renault Group ethics and compliance framework, applies to all Mobilize FS entities. It is complemented by Renault Anticorruption Code of Conduct, for which this document serves as the Annex specific to Mobilize FS activities.

This Annex – an integral part of Renault Group Anticorruption Code of Conduct – illustrates the risk situations specific to Mobilize FS, in order to guide behaviours, with a constant focus on integrity. Among the examples (non-exhaustive list) of potential corruption risks in the banking sector (Part 1), the following appear in particular:

- Conflict of interest
- Gifts and invitations
- Operations of sponsorship and image partnership
- Lobbying activities
- Corrupt practices related to money laundering and terrorist financing
- Relationships with business partners
- Securitization operations
- Debt collection activities

For other risk situations not covered in this Annex (e.g., mergers and acquisitions), the rules set out in the Renault Group Anticorruption Code of Conduct remain fully applicable.

Part 2 of this Annex outlines the procedures for managing such risk situations within Mobilize FS when they present specific characteristics differing from the practices of its parent company.

We rely on everyone’s exemplary conduct in adhering to the principles set forth in this Code of Conduct and its Annex, in order to ensure an ethical working environment that fully complies with regulatory requirements.

Martin Thomas
Chief Executive Officer



Caroline Jeandeu
Group Chief Compliance Officer



EXAMPLES OF RISK SITUATIONS WITHIN MOBILIZE FS

Conflicts of Interests

The general principles of Renault Group Anticorruption Code of Conduct apply fully within the Mobilize FS Group. However, as a banking institution, Mobilize FS is subject to enhanced regulatory requirements regarding the management of conflicts of interest.

The **same reflexes must be applied** to identify a potential risk situation:

- Do I have a personal or professional connection with a business partner?
- Could this relationship influence—or appear to influence—my decisions?
- Would I feel comfortable if this situation were known to my colleagues or to a third party?

Within Mobilize FS, these rules apply in particular to:

- **FAP-designated individuals** (subject to a “fit and proper” assessment by the ECB), who must comply with reinforced disclosure obligations upon appointment and annually thereafter.
- **Credit decision-makers**, who must refrain from taking any lending decision when a real, potential, or perceived conflict of interest exists with the borrower.

Any identified situation **must be reported without delay**, so that it can be reviewed and handled confidentially by the line manager, the compliance officer/contact person, and Human Resources.

EXAMPLE OF A RISK SITUATION

You are in charge of negotiating a partnership for a new insurance product with a company whose one of the executives (the founder and majority shareholder) is a member of your family (for example, your brother).

→ **This constitutes a conflict-of-interest situation that must be reported to your line manager and to your compliance officer/contact person, so that the contract negotiation can be assigned to another member of the team.**

FOR FURTHER REFERENCE:

- Procedure for the prevention, management and mitigation of conflicts of interest
- Conflict-of-interest disclosure forms

The Group Compliance Department remains available to address any questions relating to the management of conflicts of interest.



Gifts, Invitations and Business meals

Mobilize FS applies the same principles as those defined by Renault Group regarding gifts, invitations, and business meals. Such gestures must remain exceptional, proportionate, and compliant with internal rules and applicable laws and regulations.

To prevent any risk of corruption or conflict of interest:

- It is prohibited to offer or accept a gift, invitation, or business meal with the intent to influence a decision, during a sensitive period, or in the form of cash or cash equivalents.
- Any offer made to a public official is strictly regulated and requires prior authorization.
- Gifts, invitations, or business meals must take place exclusively in a professional context. The presence of an accompanying person is not permitted.

When the value of a gift or invitation is **not known in advance**, it is necessary to:

- **Estimate the value** using objective elements such as the restaurant's price range, the venue, or the type of activity.
- **Declare the situation** if there is any doubt regarding the value or compliance.

This approach ensures transparency and preserves the integrity of professional relationships within the Mobilize FS Group.



EXAMPLES OF A RISK SITUATION

As an IT expert, you are invited by one of Mobilize FS's IT suppliers to lead a panel discussion during a professional seminar. The service provider offers to cover all expenses (transportation, five-star hotel, meals) for several days in exchange for your participation.

→ **According to the company's rules, you may accept the entry and the lunch. If I wish to attend, accommodation and transportation costs must be covered by my entity. This invitation must be declared in advance to your line manager.**

You are pressed for time and seeking to obtain approval for a new Mobilize FS subsidiary in a third country in order to launch a commercial activity. You contact a local agent to find out whether there is a way to speed up the process. The agent tells you that he can accelerate the procedure in exchange for 10,000 in cash.

→ **You must refuse this proposal as it constitutes an act of corruption. You must immediately report it to your line manager and to your compliance officer/contact person, as well as to the Group Compliance Department.**

FOR FURTHER REFERENCE:

Management of Gifts and Invitations Procedure (The list of maximum authorised amounts by country is available directly in the procedure)

[Compliance Intranet](#)

Forms [Corporate/France](#) et [formulaire pays](#)

The Group Compliance Department is available to answer any questions you may have regarding the management of gifts, invitations, and business meals.

Sponsorship and Image partnership operations

Mobilize FS applies the same rules as Renault Group with regard to corporate philanthropy and image-based partnerships. These activities must be carried out in accordance with the principles of ethics, transparency, and compliance, without seeking any undue or personal advantage.

- **Image partnership:** disinterested support provided to an organization serving the public interest, with no consideration or with only limited consideration.
- **Sponsorship:** an image-based partnership involving contractual consideration, aimed at promoting the Group's visibility.

All such activities must:

- Comply with local regulations and internal rules;
- Be subject to an integrity due diligence review of the partner;
- Be formalized through a contract;
- Be approved by the relevant internal stakeholders;
- Be monitored and properly documented.



EXAMPLE OF A RISK SITUATION:

You are involved in organizing a promotional contest in partnership with a local non-profit organization. At the end of the operation, Mobilize FS plans to make a donation to this organization, with no direct commercial consideration.

→ **It is necessary to ensure that this initiative complies with corporate image partnership rules: verification of the organization's integrity, formalization through a contract, monitoring of the project, and traceability of the donation.**

Mobilize FS is considering a partnership with a local sports team as part of a sponsorship operation aimed at increasing brand visibility. This partnership would notably include access to a VIP area during matches and the display of the Mobilize FS logo on team jerseys.

→ **This operation must be governed by a contract specifying the expected consideration, be approved by the relevant internal stakeholders, and comply with partner selection rules.**

FOR FURTHER REFERENCE :

[Image partnership and sponsorship procedure](#)

The Group Compliance Department is available to answer any questions you may have regarding the image partnership and sponsorship.

Action of representation of interest (« lobbying »)

Unlike Renault Group, Mobilize FS does not engage in interest representation (lobbying) activities.

However, certain professional associations of which Mobilize FS is a member (such as ASF or FBF) may carry out lobbying activities as part of their missions.

Mobilize FS ensures that its interactions with these associations comply with ethical and compliance rules, particularly with regard to transparency, integrity, and compliance with legal procedures.

Corruption offences related to money laundering and terrorist financing

As a banking institution, Mobilize FS is subject to strict obligations regarding **the prevention of money laundering and terrorist financing (AML/CFT)**.

These practices may constitute indirect forms of corruption when they aim to conceal the illicit origin of funds or to finance criminal activities. As such, any suspicious or unusual transaction must be subject to enhanced due diligence and, where appropriate, a report.

Mobilize FS applies internal AML/CFT procedures, including:

- Customer identification and verification;
- Monitoring of financial transactions;
- Reporting of suspicions through dedicated channels.

These measures aim to protect the integrity of the Group and to prevent any misuse of its services for illicit purposes

EXAMPLE OF A RISK SITUATION

One of your clients has significant incoming transactions on their account from a company based in an offshore jurisdiction. The client wishes to obtain financing for a fleet of vehicles without providing you with any supporting documents proving the lawful origin of the funds. In exchange for a favourable decision, the client offers you two VIP tickets, for you and your spouse, to a major event.

→ **You must refuse the gift and refrain from carrying out the transaction, as it is suspicious. You must immediately report the situation to your line manager and to your compliance officer/contact point, as this act of corruption could facilitate a money-laundering operation.**

FOR FURTHER REFERENCE

General Procedure for Anti Money Laundering and Countering the Financing of Terrorism

The Group Compliance Department is available to answer any questions you may have regarding the AML/CFT framework

Relationships with Business Partners

Mobilize FS applies the same principles as Renault Group to govern its relationships with business partners, in full compliance with ethics and compliance standards. Accordingly, Mobilize FS:

- Assesses the integrity of third parties through the **due diligence** process, including verification of beneficial owners, politically exposed persons (PEPs), and sanctions;
- Includes anti-corruption clauses into contracts, allowing the relationship to be terminated **in the event of non-compliance**;
- Ensures that any remuneration paid to an **intermediary** is justified, transparent, and linked to an actual and properly documented service.

As a financial institution, Mobilize FS is exposed to heightened risks in its interactions with public or sensitive entities. It is strictly prohibited to:

- Disregard alerts arising from due diligence;
- Enter into a relationship without internal approval;
- Request or solicit any personal benefit in exchange for a partnership.

EXEMPLE DE SITUATION À RISQUE :

You are responsible for a partnership with a public company presenting a high risk (presence of politically exposed persons and sanctions). Despite these alerts, you enter into the relationship without internal approval and ask your contact to hire someone close to you.

→ **This situation constitutes an act of corruption, subject to disciplinary and criminal sanctions. Any relationship with a sensitive partner must be supervised, validated, and free from any personal benefit.**

FOR FURTHER REFERENCE:

TIM Process Procedure



Securitization and refinancing operations

Securitization and **refinancing** operations are core activities for Mobilize FS. They involve the transfer or mobilisation of financial assets to investors or external institutions, often within a complex regulatory framework.

Given the financial stakes and the sensitivity of the data involved, these operations must be carried out with the **highest ethical standards**. Any attempt to unduly influence a partner, conceal information, or bypass internal procedures constitutes a **risk of corruption or fraud**. Accordingly:

- Partners must undergo a **prior integrity assessment**;
- Decisions must be **documented, traceable, and validated** by the appropriate governing bodies;
- Any situation involving a conflict of interest or external pressure must be **reported without delay**.

Mobilize FS strictly prohibits any practice aimed at obtaining a personal benefit or compromising the transparency of these operations

EXAMPLE OF A RISK SITUATION:

For securitization/refinancing operations, Mobilize FS works with various banking partners. One of these partners is involved in a corruption, money-laundering, and terrorist-financing scandal within its senior management. This bank had already been placed under enhanced monitoring at the start of the relationship by the Third-Party Risk Committee following the TIM (Third-Party Integrity Management) process, in which the Group Compliance Director participates..

- **You must reassess whether it is appropriate to continue the relationship with this banking partner, given the potential risk to the image and reputation of the Mobilize FS Group.**
- **You must consult the Group Compliance Department to conduct an external due diligence if necessary**

FOR FURTHER REFERENCE:

[TIM Process Procedure](#)

Recovery operations

Debt collection operations are among the sensitive activities of Mobilize FS, as they involve direct interactions with clients who may be in difficult financial situations. These actions must be carried out with **professionalism, respect, and integrity**, in strict compliance with internal rules and the applicable legal framework.

It is strictly prohibited to:

- Solicit or accept any personal benefit in exchange for preferential treatment;
- Exert abusive or improper pressure on a client or a third party;
- Bypass established collection or negotiation procedures.

Any situation involving a **conflict of interest, external pressure**, or an **attempt at corruption** in the context of debt collection must be **reported immediately** to the compliance officer/contact point or to the line manager

EXAMPLE OF A RISK SITUATION

In the context of a debt collection action, a client asks you to delay the recovery process in exchange for a gratuity.

- **You must refuse this gratuity and immediately report the situation to your line manager and to your compliance officer/contact point..**

FOR FURTHER REFERENCE:

[Recovery Process Procedure](#)



Framework implemented within the Mobilize FS Group to prevent and detect corruption and influence-peddling risks

Whistleblowing

Mobilize FS relies on Renault Group's whistleblowing system, supplemented by its own internal channels. Reports may be **confidential or anonymous**, and the whistleblower's identity is **protected by law**.

Due to its status as a banking institution and the nature of its activities, Mobilize FS applies **specific rules**:

- The management of alerts is **centralised** under the authority of the Group Compliance Director.
- The scope also covers **breaches of banking obligations** defined by European regulations, the Monetary and Financial Code, or the AMF Regulation.
- **Legal protection** extends to individuals who have reported facts to the AMF, the ACPR, or the ECB. Such individuals cannot be subject to **sanctions or discriminatory measures** as a result of their report.

The system enables **ongoing communication with the whistleblower** while guaranteeing anonymity if requested

FOR FURTHER REFERENCE:

Whistleblowing Procedure

[WhistleB Application](#) and QR code



Third Party Assessment Process

Mobilize FS assesses the integrity of third parties in accordance with the TIM (Third-Party Integrity Management) procedure in order to identify potential risks of corruption, fraud, or other ethical breaches, as well as risks related to international sanctions regimes.

Mobilize FS's TIM processes are applied in alignment with the third-party assessment framework implemented by its parent company.

FOR FURTHER REFERENCE:

TIM Process Procedure

Trainings

The Mobilize FS Group provides its employees with **online and in-person training** programs covering business ethics topics, including **anti-corruption, conflicts of interest, ethics, and whistleblowing**. As a banking institution, Mobilize FS also delivers training specifically **dedicated to AML/CFT**. These modules are accessible via the Mobilize FS intranet under “**Learning@RG**”.

These training programs strengthen employees’ skills in **preventing risks** related to the situations described in the Code of Conduct.

FOR FURTHER REFERENCE:

[Learning@RG](#)



Risks and Compliance Intranet

The Mobilize FS Group makes available on its Risk and Compliance intranet a range of resources relating to ethics and compliance, covering the topics referred to in the present Code of Conduct (corruption, conflicts of interest, gifts and invitations, etc.), as well as other compliance topics specific to its activities (AML/CFT, fraud, customer protection, etc.).

FOR FURTHER REFERENCE:

[Compliance intranet](#)

Compliance Officers Network

The Mobilize FS Group has its own network (comprising compliance managers and/or compliance officers across all its local entities) dedicated to driving and coordinating ethics and compliance initiatives.

If you require advice on an existing rule, guidance on a new project or a process to be implemented, or if you wish to report a difficulty in applying the present anti-corruption Code of Conduct, you may contact members of this network or the Group Compliance Department.

FOR FURTHER REFERENCE:

[List of Compliance Network Members](#)

