

## Country Supplement ITALY

You have been granted Free Shares and invited by Renault S.A. to invest in Renault shares under preferable conditions (30% Discount on acquired shares and Matching Shares) in the context of the offering reserved for employees of the Renault Group, "Renaulution Share Plan 2025" (the "**Offer**").

You will find below local offering information and a summary of the principal tax and social implications applying to your investment if you participate to the Offer.

*This document is provided to you in addition to the documents relating to the Offer and in particular, the Information Brochure and the Terms and Conditions of the Offer. For additional details, please also refer to the Regulations of the group savings plan of the Renault Group, of the DIAC Group or of the Renault Retail Group (Plan d'Epargne Groupe or "**PEG**"). All documents are made available to you on the Offer website [www.renaulutionshareplan.renaultgroup.com](http://www.renaulutionshareplan.renaultgroup.com).*

*Renault shares are listed on Euronext Paris. The value of your investment will depend on the value of Renault S.A. shares and therefore implies a risk.*

*Neither your employer nor Renault can give you investment advice nor any guarantee as to the future price of the Renault share.*

*If you do not understand the contents of the documents made available to you in the context of the Offer, the nature of the investment, or the comparative risks and benefits associated with the Offer, you should contact an authorised financial advisor.*

## LOCAL OFFER INFORMATION

### SECURITIES LAW NOTICE

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In accordance with Article 1, 4., i) of Regulation (EU) 2017/1129 (the "**Prospectus Regulation**"), Renault S.A. is exempted from the obligation to publish a prospectus in Italy regarding the Offer.

This document, jointly with the Information Brochure and the Terms and Conditions of the Offer provided to you shall serve as information document required pursuant to Article 1, 4., i) of the Prospectus Regulation.

### LABOR LAW DISCLAIMER

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The Offer is made on the initiative of Renault S.A., not by your local employer, and does not form part of your terms of employment. Your participation in the Offer is completely voluntary and does not give rise to a contractual entitlement to continued employment. The Offer does not constitute a right to participate in similar transactions and there is no obligation for Renault S.A. to launch new offerings in subsequent years.

Any gains or benefits that you may receive or be eligible for under the Offer shall not constitute salary for the purposes of any retirement or other benefit plans nor for the purposes of calculating any severance or similar payment that may be due to you.

### DATA PROTECTION

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The personal data collected for the implementation of the Offer are subject to the provisions of Italian Legislative Decree dated 29 July 2003, no. 196, as subsequently amended, of the French law n° 78-17 dated 6 January 1978 as modified relating to Data Processing, Data Files and Individuals Liberties and of the EU Regulation (2016/679) of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regards to the processing of personal data and on the free movement of such data.

You are informed of the computer processing of data to be done of the information contained in the participation form by:

- Renault S.A., 122-122 bis avenue du Général Leclerc – 92100, Boulogne-Billancourt – France, as data controller of the Offer;
- BNP Paribas Epargne & Retraite Entreprises, 1, Boulevard des Italiens – 75009 Paris, as data controller for the collection and centralization of subscription requests and in its quality of account holder of the assets acquired within the framework of the PEG; and

- Uptevia, La Défense - Cœur Défense - Tour A, 90-110 Esplanade du Général De Gaulle – 92400 Courbevoie, as data controller for the payment of dividends to my bank account used for my acquisition of shares via direct bank debit, as the case may be.

The legal basis for the processing is Renault's legitimate interest to offer group employees the opportunity to participate in the Offer and receive Free Shares, as well as the execution of the acquisition contract for the Offer, to which you are party and operations resulting therefrom. All the personal data required within the framework of your participation in the Offer are mandatory and necessary to your participation in the Offer or to waive your Free Shares. If you do not provide some of this information, your request will not be taken into account.

This information will be used to process your request of participation, to satisfy any applicable legal requirements, especially regulatory and tax requirements, linked to the Offer implementation and to manage your assets until the sale of your shares. Your personal data may notably be processed by Renault S.A., and as the case may be, by your employer, BNP Paribas Epargne & Retraite Entreprises, BNP Paribas Asset Management France, Uptevia or any services provider mandated by Renault S.A.

Your personal data will be retained for the purposes of the above-mentioned processing for the time necessary for the Offer implementation and for the management of the PEG, at least until the sale of your shares, and subsequently for archiving purposes until the expiry of the limitation period of any possible dispute.

You have a right to access, modify and rectify, or erase (after sale of your shares within the PEG and subject to legal archiving requirements), and a right to restrict and to object to the processing, a right to the portability of your data, or to define guidelines relating to the conservation, erasure and communication of your personal data after your death by contacting: Renault S.A., 122-122 bis avenue du Général Leclerc – 92100, Boulogne-Billancourt - France, or BNP Paribas Epargne & Retraite Entreprises, 8 rue du Port, 92728 Nanterre Cedex-France, and pursuant to section 2-terdecies of Italian Legislative Decree no. 196/2003 you have a right to appoint a representative to exercise such rights after your death.

In addition, each Personal Data Protection Officer can be contacted at the following email addresses:

- For Renault S.A.: [dpo@renault.com](mailto:dpo@renault.com);
- For BNP Paribas Epargne & Retraite Entreprises: [ere.dataprotection@bnpparibas.com](mailto:ere.dataprotection@bnpparibas.com); and/or
- For Uptevia: [dpo@uptevia.com](mailto:dpo@uptevia.com).

You have the right to lodge a complaint with the French data protection authority, by mail to the CNIL – 3, Place de Fontenoy, 75007 Paris, France or by e-mail on the website [www.cnil.fr](http://www.cnil.fr), or to the relevant data protection authority in your jurisdiction, i.e., to the Italian Data Protection Authority by mail to Piazza Venezia n. 11 - 00187 Roma or by certified e-mail to [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it) or by e-mail to [protocollo@gpdp.it](mailto:protocollo@gpdp.it). You declare that you keep a copy of this form for your personal records.

## TAX ASPECTS

*This summary sets forth general principles that are expected to apply to employees with an employment contract who participate to the Offer and are and remain during the whole period of their investment resident of Italy for the purposes of the tax laws of Italy.*

*This summary is given for informational purposes only and should not be relied upon as being either complete or conclusive. The tax treatment that applies to you may differ from the regime described below depending on your personal situation, and in particular in the case of international mobility. You are encouraged to consult your own tax advisor for definitive advice.*

*The tax consequences described below are based on tax laws and practices as applicable in March 2025. Tax laws and practices may change over time.*

### TAXATION IN FRANCE

According to French domestic law, you will not be subject to taxation in France at the time you acquire or dispose of your Renault S.A. shares. However, any dividends that may be paid on your Renault shares will be subject to taxation in France. Please refer to the "*Dividend taxation*" section below.

### TAXATION IN ITALY



#### Will I be required to pay any tax and/or social security charges at the time of inception to the Offer?

##### → With respect to my Free Shares?

Yes. The positive difference (the "**Difference**") between:

- (i) the average stock exchange price of the Renault S.A. shares registered in the latest month (i.e., in the period between the date of the acquisition of the shares and the same date of the preceding month); and
- (ii) the acquisition price of the Renault S.A. shares (i.e., €0 for Free Shares)

constitutes in principle income from employment. Therefore, the benefit corresponding to your Free Shares (i.e., the average stock exchange price of the Renault S.A. shares registered in the latest month), will be considered as employment income, subject to personal income taxes ("**IRPEF**") at progressive rates ranging from 23% to 43%, plus, if applicable, regional surtax (at a rate generally between 0,7% and 3.33%) and municipal surtax (at a rate generally between 0% to 0.9%).

Employee social security contributions are also applicable at rates around 9-10%, borne by you.

**However, at the time of inception to the Offer, neither taxation nor social security contributions should occur on the Difference if its amount does not exceed €2,065.83<sup>1</sup> (the "Exempt Amount")<sup>2</sup> subject in particular to the conditions that (a) shares are not repurchased at any time by Renault S.A. or your employer and (b) you hold your shares during at least 3 years as from their delivery to you.**

Similarly, any excess of the Difference over the Exempt Amount at the time of inception to the Offer is subject both to IRPEF at progressive rates, plus local surtaxes where applicable, and to social security contributions.

IRPEF, surtaxes and social security contributions due will be withheld by your employer from your salary relating to the pay period during which the taxable event takes place (i.e., the month in which you acquire the shares) and remitted to the Italian tax and social security authorities by the same. If your salary is not sufficient, you may be required to provide your employer with the funds necessary to pay taxes.

→ **With respect to my acquired shares with a 30% Discount?**

The acquisition of shares at a discounted price is subject to the same tax and social security treatment as described above for Free Shares: the 30% Discount will increase the Difference, either subject to taxation and social security contribution or exempted at the time of inception to the Offer as per the Exempt Amount.

→ **With respect to my Matching Shares?**

Matching Shares are subject to the same tax and social security treatment as described above for Free Shares: the value of Matching Shares will increase the Difference, either subject to taxation and social security charges or exempted at the time of inception to the Offer as per the Exempt Amount.

→ **With respect to the payment facility granted by my employer?**

Your employer offers you the possibility to pay for the acquisition price through a salary advance, to be repaid through subsequent payroll deductions.

Any sum you received as advance on salary is subject to ordinary salary taxation and social security contribution according to a cash basis principle.

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<sup>1</sup> Please note that the €2,065.83 exemption is annual and therefore, any amount taxable and eligible for that exemption (including possible difference on Discount and Matching Shares) should be taken into account when assessing the Exempt Amount.

<sup>2</sup> If you choose to acquire shares (and therefore benefit from the 30% Discount and Matching Shares), the value of the Free Shares must be combined with the 30 % discount and the value of the Matching Shares to calculate the Exempt Amount of €2,065.83.



**If dividends are distributed by Renault S.A. during the investment period, will I be required to pay tax and/or social charges on such dividends?**

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**In France**, dividends distributed by Renault S.A., if any, are subject to a withholding tax in France at a rate of 12.80%.

**In Italy**, any dividend that you receive would have to be reported in your tax return and be subject to a 26% substitute tax on the relevant amounts. This regime applies because the shares acquired in the context of the Offer will be deposited on a share account maintained by a French bank and payment of dividends will be made without involving an Italian resident financial intermediary.

No tax credit is granted for the withholding tax suffered in France. However, please note that a several recent cases law have recognized the right to receive such tax credit.

No social security charges apply in Italy on dividends.



**Will the shares I hold be considered for the purposes of a wealth tax?**

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Yes, wealth tax ("IVAFE") applies at the rate of 0.2 % on the market value of shares held abroad as arising out at the end of each fiscal year (or at the end of the holding period, in case shares are sold before the end of the year).

A tax credit is granted for any foreign property tax levied abroad on the shares, and up to the amount of the Italian wealth tax.

You must pay this tax through the Form RW of the *Modello Redditi Persone Fisiche*.



**Will I be required to pay any tax and/or social charges at the time of sale of my shares, at the end of the lock-up period or in case of an authorized case of early release?**

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→ **Sale of shares during the first 3 years of the 5-year lock-up period**

Yes, if an early release event arises and you sell your shares during the first three years of the 5-year lock-up period, the Difference not subject to tax and social security contributions at the time of inception to the Offer will be subject to IRPEF, plus regional and municipal surtaxes, and social security contributions at the time you sell the shares. Such amount will increase the tax basis of Renault S.A. shares for capital gains purposes.

In addition, any capital gain would be taxed as described below under "*Sale of the shares after the first three years of the 5-year lock-up period*".

→ **Sale of the shares after the first 3 years of the 5-year lock-up period**

Yes, any capital gains would be subject to a substitute tax at the rate of 26%.

The taxable capital gain will be the difference between (i) the sale price and (ii) the tax basis of the shares, i.e., the acquisition price you paid (equal to zero for Free Shares and Matching Shares), increased by the portion of the Difference already taxed as income from employment, if any.

If the Difference has not been subject to tax as employment income and up to € 2,065.83, since the conditions required for the application of the "Exempt Amount" were met, the non-taxed Difference would not increase the tax basis of the shares.

No social security contributions apply.

You are required to report the capital gains in your tax return and pay the substitute tax directly. This regime applies because the shares acquired in the context of the Offer will be deposited on a share account maintained by a French bank with no Italian resident financial intermediary involved.



**Do I have any reporting obligations with respect to the acquisition, holding and sale of my shares or to the payment of dividends, if any?**

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Yes, you should report at the end of each fiscal year (or at the end of the holding period, in case the shares are sold before the end of the calendar year), in a specific section of your annual income tax return (i.e., the Form RW of the *Modello Unico Persone Fisiche*) or autonomously in an equivalent form if you are exempted from the obligation of filing the income tax return, the amount of foreign investments held. The shares in principle qualify as foreign investments for reporting purposes.

As mentioned above, reporting requirements also applies indirectly in relation to dividend payments and the sale proceeds upon disposal.