



## Country Supplement SOUTH KOREA

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 2024" (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

### 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.

### SALE OF YOUR SHARE AND PAYEMENT OF PROCEEDS

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Please note that according to recent position expressed by the Financial Supervisory Service, you may need to place your sale order with a local licensed broker in South Korea. This implies that you will need to open a share account with a local licensed broker in South Korea and transfer your shares from your overseas custodian (Uptevia) to such onshore account. Thereafter, you may request sale of your shares through the local licensed broker in South Korea.

Otherwise, you may not be able to remit proceeds from sale of your shares to South Korea.

### DATA PROTECTION

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The personal data collected for the implementation of the Offer are subject to the provisions of the Personal Information Protection Act, 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.

Under the Personal Information Protection Act, your consent to the collection, processing, use and transfer of your personal data is required.

The conditions of the collection, processing, use and transfer of your personal data are stated below.

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.

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); and/or
- 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. You declare that you keep a copy of this form for your personal records.

#### **FOREIGN EXCHANGE CONTROL REQUIREMENTS**

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If you opt to acquire shares for more than US\$5,000, prior to remittance of the Acquisition Price, the transaction must be confirmed by a local foreign exchange bank, which is generally a simple administrative procedure. The funds to be remitted and evidence of the Offer (e.g., the Offer documentation) should be submitted to a local foreign exchange bank for the confirmation.

## TAX ASPECTS

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

*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 June 2024. 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 SOUTH KOREA



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

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

Yes, the market price of the Free Shares on the date of their delivery to you is a taxable benefit.

This benefit is taxed at progressive income tax rates (between 6.6% and 49.5%) including resident surtax, and is subject to social security contributions, i.e. National medical insurance inclusive of Elderly Long-Term Care Insurance (4.004100%, subject to ceiling of KRW 4,789,900 per month) and National pension (4.5%, subject to ceiling of KRW 265,500 per month), as well as Unemployment insurance at 0.90%.<sup>1</sup>

Applicable taxes and social security contributions for the Free Shares must be withheld by your employer.

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

Yes, acquisition of shares at a discounted price is a taxable benefit, subject to the same tax and social security treatment as described above for the Free Shares.

<sup>1</sup> Please note that unemployment insurance rate has been increased to 0.9% for employee (previously 0.8%) and 1.15% to 1.75% for employer (previously 1.05% to 1.65%) from July 1, 2022.

The taxable benefit will be equal to the difference between (i) the market price of shares on the day of their delivery to you and (ii) their acquisition price.

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

Yes, the market price of the Matching Shares on the date of their delivery to you is a taxable benefit, subject to the same tax *and social security treatment* as described above for the Free Shares.

→ **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.

You will be considered as having benefited from an interest free loan granted by your employer.

You will be viewed as having benefited from a **taxable income equal to a deemed interest of 4.6% per annum** on the basis of the loan balance as reduced by salary deductions.

Such income will be subject to tax **as salary income**, at the progressive rates of the personal income tax. As salary income, it will be subject to the tax withholding by your employer (your employer will actually add the deemed interest to your taxable income at the end of the year when conducting the year-end settlement for your income tax). Social security taxes will also be due on this amount.



**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 South Korea**, you will be subject to income tax on any dividends received with respect to shares<sup>2</sup>. The taxable amount will be the total amount of the dividends issued to you.

Income from receipt of dividends from shares is subject to taxation at income tax rates from 15.4% to 49.5% including resident surtax.

You will be responsible for reporting the dividends and paying any taxes due. The dividends should be reported on a year-end global income tax return filed in May of the year following the year the dividends are issued.

Taxes paid in France will be considered for Korean tax calculation purposes as a foreign tax credit.

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<sup>2</sup> Please note that tax residents in Korea of foreign nationality who have been domiciled or residing in Korea for less than five years in total during the previous ten years ending on the last day of the relevant taxation year, are not subject to Korean income tax on their foreign source income attributable to that taxation year, unless such income is transferred to or paid in Korea.

There are no social security contributions on dividend income, unless the annual income aggregating dividends, interest and rent, etc. exceeds KRW 20 million. The amount exceeding the threshold of KRW 20 million is subject to the National medical insurance. Your reporting to the tax office may be shared with National Medical Service and may increase the base for the following year's National medical insurance if the annual income aggregating dividends, interest and rent, etc. exceeds KRW 20 million.



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

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No.



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**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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Any gain will be taxed as capital gains tax on stock (at 22% including resident surtax), provided that the gain exceeds the personal exemption from tax for the first KRW 2,500,000 of capital gains per asset/per year.

For acquired shares, the gain will be calculated as the difference between (i) the sale proceeds and (ii) the market price of the shares for which the employee pays the subscription price, provided that the employee has paid the relevant income taxes (or the local employer has withheld taxes) for the 30% discount benefits at the time of acquisition of the shares.

For Free Shares and Matching Shares, the gain will be calculated as the difference between (i) the sale proceeds and (ii) the market value of the shares upon their delivery to you, provided that the employee has paid the relevant income taxes (or the local employer has withheld taxes) for the market prices of the Free Shares and Matching Shares at the time of the delivery of such shares.

There are no social security contributions on capital gains. From 2025, a tax rate of 22% would apply to gains (minus a basic deduction of KRW2.5 million) of up to KRW300 million and a higher tax rate of 27.5% would apply to gains (minus a basic deduction of KRW2.5 million) in excess of KRW300 million.



**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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Korean residents must declare foreign financial accounts (i.e., non-Korean bank accounts, brokerage accounts, etc.) in foreign countries to the Korean tax authority and file a report with respect to such accounts in June of the immediately following year if the monthly balance of such accounts exceeds KRW 0.5 billion or an equivalent amount in foreign currency on any month-end date during a calendar year.

You will be responsible for reporting the dividends and capital gains. The dividends should be reported on a year-end global income tax return filed in May of the year following the year the dividends are issued.