
Subject: CRI Inquiry on Nickel Supply Chain, Due Diligence, Human Rights : RG answers
Date: Tuesday, May 28, 2024 at 1:51:33 AM Pacific Daylight Time
From: LUCAS Dominique
To: Brad Adams, Krista Shennum
CC: DE-QUATREBARBES Clementine, MOREAU Elvire
Attachments: image001.png, image002.png

Hello,

Sorry for late reply... but on time !

See below:

- Our answers
- Some slots proposal to exchange (French time) : May 31th 12am; June 3rd 11am; June 3rd 3pm

Regards,

Dominique LUCAS

Sustainability Performance & Dialogue

Renault Group

Regarding supply chain mapping:

1. Has Renault **mapped** out its critical mineral supply chain back to the **mine** level? If so, please provide information, including **names and locations**, of all mines along Renault's battery supply chain.
Renault Group launched a study with a consulting firm in order to draw up a "Critical material/Country" cross-risk map for 18 ores, including cobalt, lithium, nickel, manganese and natural graphite, which are used in batteries. This mapping will be finalised in 2024. It will be based on an ESG risk assessment methodology using public and transparent indicators and will make it possible to better identify and prioritise Environment / Health – Safety / Human Rights and Governance risks according to ore and country.
2. Has Renault **mapped** out all of the critical mineral **smelters/refineries** in its supply chain? If so, please provide information, including **names and locations**, of all mines along Renault's battery supply chain.
Renault Group mapped and published its Cobalt supply chain refiners and traders
https://www.renaultgroup.com/wp-content/uploads/2020/06/renault_cobalt_supply_chain_mapping_.pdf
3. Does Renault source **nickel from Indonesia**, either directly from nickel mining and processing companies or indirectly through its suppliers? If so, please provide information about the sources of Renault's Indonesian nickel.
Renault Group is not sourcing directly Nickel from Indonesia.
4. Please provide a **list of countries** from which Renault sources each of the following minerals: **nickel, lithium, cobalt, manganese, and graphite**.
Renault Group currently does not publish a countries list of critical mineral sourcing.
More information [here](#)
5. Has Renault made any **agreements to directly source** nickel or other critical minerals directly from mining companies or mineral processing companies? If so, please provide information about those agreements.
Nickel: 2021 Finland <https://media.renaultgroup.com/renault-group-to-partner-with-terrafame-for-sustainable-nickel-supply/?lang=eng>
Lithium: 2021 Germany <https://media.renaultgroup.com/renault-group-partners-with-vulcan-energy-in-the-zero-carbon-lithium-project/?lang=eng>
Cobalt: 2022 Morocco <https://media.renaultgroup.com/renault-group-and-managem-group-sign-an-agreement-for-a-sustainable-supply-of-moroccan-cobalt/?lang=eng>
Lithium: 2023 France <https://www.renaultgroup.com/wp-content/uploads/2024/05/2023-2024-renault-group-integrated-report-en.pdf#page=43>

6. Please provide information, including **names and locations**, of all **electric vehicle battery manufacturers** that Renault sources from, including the names and locations of battery manufacturing facilities.
Renault Group does not publish the full list. However, the following information are available online :
LG – Wrocław, Poland, <https://www.renaultgroup.com/news-onair/actualites/z-e-50-les-secrets-de-la-batterie-de-nouvelle-zoe/>
AESC – Douai France : <https://media.renaultgroup.com/renault-group-places-france-at-the-heart-of-its-industrial-strategy-for-ev-batteries/?lang=eng>
VERKOR - Dunkerque France : <https://media.renaultgroup.com/renault-group-and-verkor-a-long-term-commercial-partnership-for-high-performance-low-carbon-batteries/?lang=eng>
MINTH – Ruitz, France : <https://media.renaultgroup.com/renault-group-and-minth-group-join-forces-to-produce-battery-casings-for-electric-vehicles-assembled-in-france/>

Regarding corporate due diligence:

7. How does Renault ensure that the mining and smelting of critical minerals, including nickel, used in its electric vehicles does not contribute to human rights and environmental abuses? **What due diligence measures** is Renault taking to monitor and/or **prevent abuses**?
[See answer to Q8](#)
8. What steps does Renault **take to investigate** and act on allegations of environmental and/or human rights **abuse** in its supply chain?
Renault has a policy on human rights due diligence (available here: <https://www.renaultgroup.com/wp-content/uploads/2020/06/groupe-renault-policy-eng.pdf>). It refers to the OECD Guidance for Multinational Enterprises and UN Guiding principles. It currently applies to cobalt and minerals from conflict affected and high-risk area. It should be extended to additional raw materials, including Nickel, by the end of 2024.
As part of the coordination of its Vigilance Plan, Renault Group continuously ensures the proper performance of reasonable due diligence and remediation procedures necessary to confirm alignment with the following texts:
 - UN Guiding Principles on Business and Human Rights;
 - Fundamental Conventions of the International Labour Organisation (ILO);
 - OECD Guidelines for Multinational Enterprises;
 - Fundamental Rights at Work and the International Bill of Human Rights.
These points are monitored monthly by the Vigilance Plan Steering Committee.
More about Vigilance Plan Governance [here](#) (the 2024 Vigilance Plan will be published in a few weeks at the following address: <https://www.renaultgroup.com/en/renault-group-vigilance-plan/>)
Further detail here (scroll down) <https://www.renaultgroup.com/en/our-commitments/for-a-shared-ethics/sustainable-purchasing/>
9. Has Renault undertaken any steps, including but not limited to **audits**, to investigate the environmental and human rights impact of the critical **minerals** it sources? If yes, please describe those **steps and the results** of the investigations.
“Minerals supply chain”: An audit firm specialising in this sector was appointed to conduct comprehensive mapping of Renault Group’s cobalt supply chain and also on-site audits of identified actors. So far, 17 audits have been conducted at each level of the supply chain, leading back as far as a number of small-scale mines in the Democratic Republic of Congo (DRC). No critical non-conformities have been identified during these audits.
General process for suppliers: The assessment of suppliers’ situation based on the risk mapping is based on two pillars:
 - assessments through an Internet platform (principally EcoVadis) to assess suppliers’ and subcontractors’ policies and actions relating to environmental, social and corporate governance.
 - on-site audits of suppliers and subcontractors. From 2018 to 2023, the Group commissioned 152 social, safety, health, environmental and ethics audits of supplier sites, performed by outside companies mainly in five countries: China, India, Morocco, Russia and Turkey. (Direct suppliers)
More information [here](#)



10. Does Renault have a **grievance mechanism** that can be used by communities impacted by critical mineral mining and smelting to report human rights and/or environmental abuses? If yes, how often is the mechanism used? How does Renault make impacted communities aware of the mechanism and ensure that it is accessible and available to those communities?

Renault Group has a grievance mechanism. The whistleblowing system covers the issues raised by the 2017 French law on the duty of vigilance*. It is accessible through the Renault Group institutional website. This system relies on, in particular, a platform 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 online at <https://renault.whistleb.com>. In 2023, 568 new reports were received through the whistleblowing tool worldwide. All reports are examined. Of the closed cases, after investigation, 29% were confirmed, with the main causes being: acts of psychological harassment, unethical behaviour, and fraud.

* The 2017 French law does not apply to communities, only to employees of suppliers and subcontractors. There is no warning system as such for 'communities', as this is not provided for in the applicable texts, but that these communities could naturally turn to Renault if necessary?

11. Our investigation found that open pit nickel mining in Indonesia, including in Central and East Halmahera, has led to high levels of **deforestation**. Does Renault account for greenhouse gas emissions from deforestation for mining in its **Scope 3 emissions calculations**? If not, why not?

RG calculate and publish its scope 3 emissions including material and goods sourcing emissions with the GHG protocol. Accounting is based on cradle-to-gate emissions related to the extraction of materials and fuels, the transformation of materials into parts and the logistics between the extraction and the tier1 supplier site relative to the number of vehicles sold.

Mining potential impact on land like potential deforestation is taking into account in the land use item of the Life cycle assessment.

More about GHG emission results [here](#) and RG protocol [here](#)

12. Has Renault made any **commitments to reduce or eliminate fossil fuels** in its supply chain? If yes, please provide us with any relevant documentation. Does Renault have any other **climate goals** or commitments? If so, please provide documentation of those commitments.

In 2019, Renault Group was the first carmaker to have decarbonisation targets validated with the Science-Based Targets (SBTi) initiative.

In April 2021, Renault Group published its Climate Plan. It is broken down into nine major actions over the entire life cycle of vehicles, described below. They will be gradually rolled out across the Group until 2030, an interim milestone towards our ambition of carbon neutrality in Europe by 2040 and worldwide by 2050. In addition to the nine actions, the Group has tools and processes to manage risks and opportunities.

More about climate goals [here](#)

2 examples:

- **Low-carbon battery production:** in association with its suppliers, Renault Group is reducing the carbon footprint of battery production by using decarbonised energy and materials. Renault Group aims to reduce the carbon footprint of the new R5's battery produced in France by 20% by 2025 compared with the Zoe battery in

- 2019. The reduction is expected to reach 35% in 2030
- In addition to the battery, the **six commodities** with the highest carbon emissions have been identified (steel, aluminium, polymers, tyres, electronic components and glazing). A specific procedure has been put in place to ask suppliers to report emissions and develop associated reduction proposals for new projects, particularly for steel and aluminium.

More on [Green Procurement Guidelines environmental CSR guidelines for suppliers here](#)

13. Has Renault made any **commitments on human rights**, including on **Indigenous Peoples' right** to exercise free, prior, and informed consent? Does Renault have any requirements on human rights for its suppliers? If yes, please provide documentation of those commitments.

As detailed in the Vigilance Plan:

In accordance with the United Nations Declaration on the Rights of Indigenous Peoples 2007 (UNDRIP) and local regulations in terms of property rights:

- Renault Group works to minimize potential negative impacts and encourage positive impacts of its projects on local communities and indigenous peoples. In particular, the safety of its employees and facilities must not be exercised at the expense of respect for the human rights of local communities and indigenous peoples.
 - Renault Group develops activities with a positive impact and involving all stakeholders in the territories, and on each site where the Group has a significant weight and influence on its immediate environment, it aims to establish a development plan for local communities and indigenous populations based on a precise analysis of impacts. In addition, in accordance with the 2019 Global Framework Agreement, employees who wish to become involved with solidarity-based associations and enterprises have specific arrangements, in compliance with local laws, for the time spent on these activities

Details in Vigilance plan [here](#)

Confidential C

De : Brad Adams [REDACTED]

Envoyé : samedi 18 mai 2024 02:12

À [REDACTED]

Objet : Re: Inquiry on Nickel Supply Chain, Due Diligence, Human Rights



Dear Dominique,

I am following up to see if you are still available to meet with us to discuss Renault's supply chain due diligence. We will be publishing responses and non-responses from electric vehicle companies in early June, and request that you send written responses as soon as possible and before **Friday, May 31** for your responses to be included.

Please let us know if you are able to meet in the coming weeks.

Best regards,