

	RINA ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM POLICY	POL-COARM-10
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RINA GROUP POLICY

ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM

Revision	Date	Drafted	Verified	Approved
0	14/11/2025	VALRE	PSL	CL014

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RINA is committed to preventing and combating money laundering, self-laundering (AML), and the financing of terrorism (CFT), with the ambition of contributing to the creation of a safer global financial system. This commitment aims to protect the company and its stakeholders from commercial and reputational risks, as well as from administrative, civil, and criminal sanctions.

To uphold these commitments, RINA adopts a zero-tolerance approach toward behaviors aimed at money laundering and terrorism financing.

In line with the most stringent international regulations and standards in the field, including the recommendations of the Financial Action Task Force (FATF), Directive (EU) 2024/1640, and Regulation (EU) 2024/1624 on anti-money laundering, RINA has developed AML/CFT measures, which include the Code of Ethics, this policy, the anti-fraud policy, and the Organization, Management, and Control Model.

Through its Know Your Customer (KYC) function RINA carries out customer portfolio analysis and manages credit limits assignment and monitoring. Additionally, RINA has established risk-based processes for reputational and financial due diligence of third parties, aimed at avoiding partnerships with entities that do not meet the company's ethical standards or are subject to economic sanctions.

Considering the above, to achieve its objectives, RINA requires all employees to:

- Know their customers,
- Obtain information and understand the purpose and nature of business relationships,
- Carefully examine all transactions,
- Not accept or authorize payments without proper supporting documentation or invoice,
- Refrain from conducting transactions in cryptocurrencies,
- Record all transactions (financial or otherwise) and expenses,
- Limit cash transactions to strictly necessary cases.

This policy applies to all RINA personnel in every country where the company operates, as well as to its collaborators, who are expected to comply with company procedures and report any violations through the whistleblowing platform available at whistleblowing.rina.org.

14 November 2025

Carlo Luzzatto
Chief Executive Officer and General Manager