



RINA ANTI-FRAUD POLICY

This anti-fraud policy is established to promote proper and ethical behaviour and facilitate prevention and detection of fraud and applies to any irregularity or suspected irregularity involving employees, as well as consultants, vendors, contractors, or any other parties with a business relationship with RINA Group.

RINA adopts a zero-tolerance approach towards any intentional fraudulent behaviour and is responsible for and committed to the prevention and detection of fraud, in accordance with its Code of Ethics and the Organizational Model.

Fraud is defined as the intentional false representation or the intentional concealment of a material fact committed by one of the above-mentioned potential authors for their personal interest, and includes, but is not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering because of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons Merger and Acquisition or securities activities engaged in or contemplated by RINA
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to RINA
- Destruction, removal, or inappropriate use of documents and filed records.

Any suspected or detected irregularity is reported immediately in the RINA whistleblowing platform (whistleblowing.rina.org). Reporting persons must act in good faith and be aware of the potential consequences of their complaint. The allegations resulting malicious and false upon the investigation will be considered as a fraudulent act and prosecuted accordingly.

Investigations of all suspected fraudulent acts are carried out by Corporate Internal Audit without regard to the suspected wrongdoer's length of service, position, title, or relationship to the Group.

Results of the investigation are reported to the Chief HR Officer for possible sanctioning, including the termination of the work contract.

Any information gathered or received during investigations is treated confidentially, to safeguard the investigation and protect the reputation of the reporting and suspected persons, until full clarity is made on the suspected behaviour.

March 2021

The Chief Executive Officer