



Anti-bribery Guidelines

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1. Foreword

According to the Global Competitiveness Report from the World Economic Forum, bribery is the main obstacle to carrying out business and a serious threat to sustainable growth, stability and free market competition. The fight against bribery is, therefore, to be considered one of the primary strategic objectives of business companies worldwide.

A key factor for RINA Group's reputation is its ability to carry out business with loyalty, fairness, honesty, integrity and transparency, and in compliance with national and international laws, standards and guidelines.

2. Scope

In accordance with these principles, the Board of Directors of RINA S.p.A. has adopted the following Anti-bribery Guidelines (hereinafter the Guidelines), which take into account the principles established in RINA Code of Ethics and in the Anti-bribery Policy. Their purpose is to disseminate within RINA Group and inform all personnel who work for or on behalf of any of Group Companies the basic rules and the fundamental principles in countering any sort of bribery.

In order to actively contribute to the fight against bribery, RINA S.p.A. has implemented a Management System for bribery prevention, as a tool for proactive management of the risk of bribery and strengthen the culture of legality, committing itself to its continuous improvement and identifying the International Standard UNI ISO 37001: 2016 as the management model on which this System is based. The Anti-bribery management system can be extended to the subsidiaries of RINA S.p.A.

3. Field of application

These Guidelines apply to RINA Group personnel and to whoever operate in favour of or on behalf of a Group Company, within their duties and responsibilities, including the members of the Board of Directors and, where present, the members of the Control Body and the Board of Statutory Auditors.

The commitment to observance of RINA Code of Ethics, the Organizational Models, the Anti-bribery Policy and the principles contained therein by all those who work for or on behalf of Group companies must be included in specific contractual clauses and accepted by the third party.



4. Definitions

Sensitive activities: RINA Group activities with a potential risk of a bribery offence.

Business partner: a third party with a business relationship with a Group Company and with which operative or commercial agreements are made (including joint ventures, shareholding, co-operations etc.), or which have a Significant Contact in carrying out their assignment on behalf of RINA Group.

SIGNIFICANT CONTACT: any direct or indirect contact relating to:

- Relations with Public Officials, bodies or functions with legislative, legal, administrative or executive powers
- Surveys, inspections, authorizations, registrations by a public Administration
- Contracts with a public Administration or any activity that involves an administrative body or a company owned or controlled by a Public Administration
- Negotiations, agreements or meetings with Administrations or international governmental organizations

Bribery: for the purpose of these Guidelines, the following definitions apply to either active or passive bribery, taken from international sources and simpler than the ones foreseen in some national regulations.

- Active bribery: any conduct intended to offer, promise, give, pay, authorize, directly or indirectly, anybody to give or pay any improper benefit or other utility, to a Public Official or a private individual
- Passive bribery: any conduct aimed at requesting, agreeing or accepting any improper benefit, in cash or other forms, from a Public Official or a private individual, including abuse of position, as foreseen in the Italian legislation, whereby the passive subjects are considered victims and not accomplices

RINA Group: RINA S.p.A. and its subsidiaries, whether they are directly or indirectly controlled by:

- Majority of votes in an ordinary Assembly
- Number of votes sufficient to have a dominant influence in an ordinary Assembly
- Dominant influence as defined in particular contractual provisions

Control body: the Control Body defined in the Organization, Management and Control Model, according to Italian Legislative Decree No. 231/2001, of RINA S.p.A. or other Group Companies.



Group personnel: group Companies' Executive Officers, Directors, Managers, Employees and Associates.

Public official: according to the UN Convention against Bribery, a Public Official is:

- Anybody, either permanently or temporarily appointed or elected, holding any legislative, legal, administrative or judicial power, at any hierarchical level, whether paid or not paid
- Anybody exercising a public function, for a public administration or public company, or in charge of a public service, as defined by national laws and applied in the pertinent legislation

A foreign Public Official is anybody, either appointed or elected, holding any legislative, legal, administrative or judiciary power in a foreign country or anybody carrying out a public function in a foreign country, also for a public administration or a public company. An Official of an international Organization is anybody working for or acting on behalf of an international organization.

UNI ISO 37001:2016: international standard adopted in 2016 aimed at:

- Identifying a set of measures and controls that represent good practice at global level with reference to the prevention of bribery;
- Offering a reference scheme intended to designing, implementing, maintaining and improving an adequate Anti-bribery management system

Anti-bribery policy: a document aimed at summarizing and integrating into an organic framework the rules for preventing and fighting bribery already in force within the Group, in particular the Code of Ethics, the 231 Organizational Models, the Anti-bribery Guidelines and the Compliance Programmes approved by RINA S.p.A. and its Subsidiaries, raising awareness among the Recipients about the rules and conducts that must be observed.

Bribery prevention compliance function: the person or persons having responsibility and authority for the operation of the ISO 37001 Bribery Prevention Management System, identified as the Director Corporate ESG & Compliance Function of RINA S.p.A..

Anti-bribery due diligence: process aimed at assessing the nature and extent of the risk of bribery, as well as compliance with the ethical-behavioural standards on Anti-bribery defined by RINA S.p.A., in order to support the latter in making decisions in relation to specific transactions, projects, activities, business associates and personnel.



5. Applicable rules

Breaching anti-bribery rules can seriously damage RINA Group's reputation and is a serious threat to business, for legal consequences such as fines, prohibition to sign contracts with public bodies, requisition of improper profits or claims for compensation. The Group Personnel, during its activities, is therefore required to comply with applicable national and international regulations, such as the ones shown in the following table, as well as to comply with the following internal rules:

- The Code of Ethics adopted by RINA S.p.A., including values and fundamental principles that guide all RINA Group activities
- Anti-bribery Policy
- Organization, Management and Control Models adopted by RINA S.p.A. and other Group Companies
- Assignment of Responsibility and Organization Documents, and relevant manuals, procedures, instructions and guidelines adopted by RINA S.p.A. and other Group Companies, including these Guidelines, as stated in 3



REFERENCE NATIONAL AND INTERNATIONAL REGULATION	FIELD OF APPLICATION
The Italian Criminal Code and relating laws, including Italian Legislative Decree No. 231, dated 8 June 2001, as amended; Law No. 190 of 6 November 2012 on prevention and fight against bribery in the public administration; Italian Presidential Decree No. 62, dated 16 April 2013, including the code of behaviour of Public Officials	Compulsory for RINA S.p.A. and other Group Companies based in Italy
Other applicable national laws, such as the UK Bribery Act (2010) and the USA Foreign Bribery Practices Act (1977)	Compulsory for Group Companies operating in those countries
UN Convention against Bribery (UNCAC) (2003)	Compulsory for Member States who have ratified the Convention
UN Global Compact that requires companies to adopt specific internal measures, such as policies, procedures and programs against bribery, external ones, by sharing experience, case studies and best practices, and collective ones, by sharing information and efforts with other industry sectors and stakeholders	Voluntary
Council of Europe Convention against Bribery and relevant working group of States against bribery (GRECO) established within the European Council, meeting periodically to assist Member States in the struggle against bribery, ensuring that they respect the rules of the Council of Europe combating bribery, through a peer review	Compulsory for European Member States
OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, dated 17 December 1997	Compulsory for Member States who have ratified the Convention
OECD Guidelines for Multinational Enterprises (2011)	Voluntary



The table lists the most relevant reference rules for RINA Group activities. This list is not exhaustive. Other documents or requirements must be taken into account by Group Companies, depending on their specific activities and countries where they operate.

6. General principles

The general principles to be observed to ensure an adequate internal control system and risk management against bribery include the following:

Compliance with the code of ethics and the anti-bribery policy

All activities are to be carried out according to the rules of conduct reported in RINA S.p.A. Code of Ethics and Anti-bribery policy, applied by all Group Companies, that forbids bribery, without exception.

Separation of functions

Any company activity should be carried out in accordance with the principle of function segregation, so that people responsible for authorizing an operation are different from those operatively carrying out or controlling such activity.

Delegation of powers

Delegation of powers and signature should be:

- Consistent with assigned organization and management responsibilities
- Clearly defined and known within the company. The Company roles which are given the power to commit the Company in specific operations should be well defined, specifying the limits and nature of their authorization

Delegation of authority for a certain kind of agreement should meet specific requirements imposed by the law for carrying out this deed.

Transparency and traceability

Each task should be verifiable, suitably documented and correctly filed.

Internal rules

The set of company rules should be consistent with services undertaken and complexity of the organization, in order to ensure the necessary controls and prevent the occurrence of bribery.

Training

Specific personnel training programs should be foreseen on the anti-bribery measures adopted by RINA Group.



Impartiality and absence of conflicts of interest

All the activities performed by RINA Group must be carried out avoiding any situation from which conflicts of interest may arise, even potentially.

7. Duties and obligations

Group Personnel are required to:

- Behave in a proper and transparent manner, in accordance with laws and internal procedures/provisions, in all company activities, whether addressed to private individuals or to the Public Administration
- Provide for the traceability of information flows to the public administration
- Provide colleagues with instructions on how to keep formal and informal contacts with Public Officials and third parties, transferring their know-how about applicable laws and awareness of potential threats

It is expressly forbidden for all Group Personnel and people who represent or act on behalf of a Group company to:

- Carry out activities or behave in a way that can - or even might - be interpreted as corruptive misconduct leading to improper benefits or some privileges for themselves or others, for instance:
 - When dealing with offers and contracts with the Public Administration, in private negotiations with the Public Administration, or any kind of calls for tender bids made by the Public Administration
 - To obtain authorization or recognition from an Authority; or
 - Assigning a facilitated loan to the company
- Requesting or accepting promises, money or other advantages that are not due in order to carry out or omit an act relating to the exercise of one's powers, for example in the course of:
 - Carrying out certification activities in regulated, mandatory fields or,
 - Carried out by delegation or on authorization of the State Authority



- Carry out activities or behave in a way that can - or even might - be interpreted as an abuse of position to procure money, favours or other benefits, for instance during:
 - Technical activities (such as during drawing or project approval)
 - Surveys or audits
 - Consulting activities that can influence the Public Administration
- Giving money to Italian or foreign public officials or their relatives
- Make payments to speed up, facilitate or ensure routine services or any other Public Officials' activities relating to Group companies
- Securing advantages or favours of any kind, even through an intermediary, for persons representing the Public Administration or persons in charge of a public service, such as to influence the free performance of their activities (e.g., promises of employment)
- Accepting remuneration for external collaborators that is not related to the type of assignment they carry out or that is not adequately justified in the context of the contractual relationship established with them
- Offer gifts or liberalities outside company practices or effect arbitrary public relation expenditure outside the Group's objectives
- Exploit or boast existing or boasted relationships with an Italian or foreign public official, in order to make them give or promise, to themselves or others, money or other benefits, as the price of their unlawful mediation, or to remunerate them for the exercise of a function
- Facilitate the so-called 'revolving door' phenomenon, especially in the phase of selection and recruitment of personnel and of qualification of consultants and external collaborators

The above-mentioned rules also apply to bribery practices towards private persons. In particular, and in addition to the above prohibitions, it is absolutely forbidden to:

- Giving or promising money or other benefits to another company so that it chooses RINA S.p.A. as its supplier
- Receive, demand, pay and offer, directly or indirectly and in an undue manner, compensation of any kind, gifts, economic advantages or other benefits from or to a private individual



8. Sensitive activities

The RINA Group risk management system is based on prevention and control principles, in order to identify any measure necessary to mitigate the risk of bribery in the conduct of its business, in particular dealing with the following sensitive activities.

8.1 Gifts and hospitality

Any liberality, such as gifts, hospitality or other expenses may be given or received when they are forms of commercial courtesy, they do not compromise the integrity or the reputation of one of the two parties and they cannot be interpreted by an impartial viewer as aimed at determining an obligation or to obtain improper benefits.

Any gift, hospitality or other benefit, offered directly or through a third party (e.g., by anybody or any company indicated by a Public Official, a private person, a Business Partner, or equivalent), should have the following characteristics:

- It must be carried out for legitimate business objectives (e.g., aiming at increasing or promoting the Group's image and maintaining good commercial relations) and be of modest value
- It must not be motivated by a desire to exercise undue pressure (e.g., as any form of liberality to third parties that can influence their independent judgment, or induce them to grant any improper benefit)
- It must not consist of a sum of money (e.g., cash, cheque, bank transfer, or any other form, including cryptocurrency)
- It must be made by delegated persons, within authorized expenditure limits
- It must be documented in a proper and correct manner, in the accounting system of the company incurring the expense
- It must be in accordance with applicable laws

Any gift, hospitality or other benefit, directly or indirectly (e.g., through relatives) received by Group Personnel, must respect the following principles:

- It must be in accordance with legitimate commercial practices and be one of modest value
- It must not be requested, demanded or accepted in order to carry out or omit a due activity

When Group Personnel receive gifts that do not respect the above-mentioned principles, they are required to inform their superior and the competent Control Body, through suitable dedicated channels or the whistleblowing platform.



8.2 Political contributions

Political contributions may be deemed a bribery law violation, if they are improperly used as a means of bribery to keep or obtain a business advantage, such as gaining a contract, obtaining a license or authorization, etc. Due to these risks, the Code of Ethics does not allow any corporate forms of economic or any other sort of support to parties, movements, committees, political or union organizations.

8.3 Charitable contributions and donations

Donations to charities, institutes or administrative bodies may run the risk of misappropriation of funds or valuable goods for the personal use or benefit of the recipient, even if the recipient does not receive a direct economic benefit.

Therefore, any sort of charitable contribution is only allowed when it meets the following conditions:

- It is exclusively made by duly authorized/delegated persons, within budget limits and in accordance with company's procedures
- It is granted to reliable institutions, with an excellent reputation and which must demonstrate to be recognized in conformity with the applicable laws (Anti-bribery Due Diligence activities)
- These contributions must be properly, truthfully and clearly documented in the company's accounting books and a receipt must be requested
- According to applicable requirements and the Group's internal procedures, payments to beneficiary must be exclusively made to the beneficiary's account in the name of the beneficiary
- Payments to coded current accounts or in cash, in cryptocurrency or to somebody other than the beneficiary or to a different country from the one of the beneficiary are not allowed
- The beneficiary must undertake to record funding in a proper and transparent manner in its own books and registers



8.4 Sponsorship of events

Sponsorship of events (or equivalent) have the purpose of increasing the RINA Group's image and must respect the following principles:

- They must be authorized in accordance with Group authorization procedures
- Are only carried out in favour of reputable entities, with an excellent reputation and which must demonstrate that they are recognized in accordance with applicable regulations (Anti-bribery Due Diligence activities)
- Sponsorship must not contain any sort of political or union propaganda messages or contrary to the Code of Ethics
- Sponsorship above a given value should be formalized in appropriate contracts, as foreseen in internal procedures
- The sponsorship contract should include the beneficiary's commitment to comply with RINA Code of Ethics, Anti-bribery policy and the company procedures, and to use the agreed amounts exclusively for the scope foreseen in the contract
- Payments must be exclusively transferred by traceable payment system; the use of cryptocurrency is forbidden
- The outcome of each initiative is to be evaluated afterwards, to verify that payments exclusively correspond to what is indicated in the sponsorship contract

8.5 Accounting procedures

All Group Companies must keep detailed and complete records of each business transaction. All costs and charges, incomes and takings, profits, payments and expenditures are to be promptly registered, in a complete and accurate manner, and properly documented, in accordance with applicable laws and relevant internal audit system procedures.

According to these principles, all payments and purchase and sale transactions of goods and services are to be carefully filed in the relevant companies' books and accounting registers so that, RINA Group's books, registers and accounting records properly and correctly reflect all these activities, with a reasonable level of detail.



8.6 Management of financial resources

Financial resources transactions are to be managed in a transparent, trustworthy and traceable manner. The following conditions must also be met:

- Making payments in respect of the duly approved budget on the basis of the powers defined internally
- Using exclusively qualified operators that can prove they follow personnel and IT procedures, capable of preventing unlawful bribery and money laundering behaviour
- Implementing suitable means to record income and outgoings, as well as periodically comparing planned and reported activities
- Assessing and recording consistency between provider/customer's name and bank account's owner for delivery or acceptance of payments
- Ensuring that financial transactions are always authorized by duly delegated persons showing relevant evidence documentation
- Ensuring that the cash register (when present) stays within defined deposit limits and is periodically (at least monthly) verified by tracking actual transactions and reconstructing the occurring movements

Moreover, it is forbidden to:

- Carry out transactions with non-registered partners, or based on incomplete information (e.g., lack of identifying data)
- Accept payments without adequate supporting documentation (e.g., lack of invoice)
- Follow unusual payment practices in relation to the kind of service or divide payments in a different way to the one foreseen in the contract
- Make payments to different countries to the one in which the partner has established its headquarters or operative and commercial branch
- Authorize payments to third parties that are not properly justified in accordance with the contract agreed with them
- Use cash beyond applicable law allowances, or other bearer's financial instruments or anonymous/fake bank accounts
- Carry out transactions using cryptocurrency
- Make facilitation payments to Public Officials to facilitate or speed up a commercial transaction or activity



8.7 Sales and purchases

Sales and purchases of goods and services are to be managed in a loyal, fair and impartial manner. Sales management must be carried out in accordance with the following principles:

- Offers are to be defined in a consistent, transparent and correct manner, and duly authorized on the basis of internal powers
- Pricing and possible discounts in bidding are to be traceable, including comparison between price and market values
- Counterparts are to be previously qualified in accordance with company procedures (Anti-bribery Due Diligence activity)

For purchases of goods or services, Group Companies are obliged to:

- Only use qualified suppliers, qualified in accordance with technical, economic, legal and HSE criteria
- Only use consultants, selected in accordance with distinguished professional, competence and organizational requirements
- Examine the international blacklists against money laundering and terrorism financing to ascertain the possible presence of suppliers
- Carry out an objective and documented selection, requesting more than one offer for fair comparison, as foreseen in company procedures
- Justify the use of a single provider or direct assignment of a contract, deriving from specific needs
- Ensure that contracts and purchase orders are made and signed by authorized personnel only
- Ensure that these contracts and purchase orders include safeguard clauses that require the counterpart to respect the principles set in RINA Code of Ethics and the present Guidelines, applicable anti-bribery laws, as well as RINA Group's right to terminate the commercial relationship in the case of any violation
- Ensure that the purchasing process meets the segregation of roles principle
- Verify the accuracy of invoices received and their correspondence with the services contractually rendered
- Verify the consistency between paid amount, the service actually rendered and market conditions
- Verify the supplier's performance in accordance with contractual obligations



Moreover, it is forbidden to:

- Randomly exclude suppliers that meet the required criteria from tenders or calls, without any justification
- Use service providers who have family or affiliated relationships or that can be in conflict of interest with the purchasing company
- Make bank transactions relating to services supplied to a different country to the one where their headquarters or operative and commercial branch is located

8.8 Personnel employment

The following principles are to be taken into account when employing new personnel, among others:

- The need for a new member of staff must be justified in accordance with specific plans or contingent needs and duly authorized
- Candidates are to be interviewed by different people and the selection process results are to be properly traced
- Candidates' references are to be checked, during the selection process, including questions regarding personal or economic relationships with representatives of institutions, to be carefully evaluated internally, if present, any relationship with Public Officials, any possible criminal precedent, indictment, civil or administrative claims, or ongoing investigations relating to unethical or illegal activities carried out in breach of applicable laws (Anti-bribery Due diligence activity)
- Respect of the laws of the country of employment must be ensured (e.g. about employment obligations, presence and validity of residence permits, etc.)

8.9 Business partner

The commitment to comply with laws and the reference principles of RINA Code of Ethics and Anti-bribery policy by third parties with contractual relations with RINA S.p.A. or other Group Companies are to be foreseen in suitable contractual clauses and be accepted by the contracting third party, whether they be a natural person or a company.



In particular, Business Partners' contracts are to include a commitment to:

- Maintain proper management and control procedures to ensure compliance with anti-bribery and money laundering laws, when undertaking duties agreed in the contract and for the whole period of validity of the contract
- Ensure that any sub-contractor of services relating to the contract, strictly undertakes these services on the basis of a written agreement imposing equivalent conditions to those foreseen in the Business Partners' contract
- Allow the Group Company to carry out any controls, when deemed necessary
- Foresee the right of RINA S.p.A. or the Group Company to terminate or suspend the execution of the contract and receive damages for having violated a contractual obligation

8.10 Mergers and acquisitions

The RINA Group has its own internal merger and acquisition (M&A) procedures.

The due diligence foreseen at the earliest stages of the M&A process - including merger, acquisition and joint ventures - is to include preventive verification of the partner's compliance with anti-bribery laws (Anti-Bribery Due Diligence activities), to get a true and complete picture of the partner's status, and its commercial and professional integrity. The Internal Audit function may be involved to assess any potential risk, together with the team carrying out the due diligence.

If any risk factor (e.g. Red Flags) is identified, the team of internal and external legal consultants involved in the M&A must inform the competent Control Body of the existence of any new anti-bribery risk or any possible increase of the existing risk profile, so that all necessary mitigation measures may be taken to protect the Group.

Moreover, the post-acquisition plan is to include compliance with these Guidelines, as part of the post-acquisition integration process.



9. Training and information

Group Personnel should be duly trained and informed, when employed and by means of updating courses, about risks and liabilities that individual persons and Group Companies can face during their activities.

In particular, all Group Personnel are to follow an e-learning training program, on anti-bribery policy, providing the required know-how about applicable anti-bribery laws and regulations and instructions to deal with the most sensitive activities.

The new employees are given an information pack containing, the Ethical Code, the anti-bribery policy, the Organization, Management and Control Model applicable to the individual companies and the current Guidelines. Lastly, they are required to follow a basic e-learning course within three months of employment which also contains these principles.

Moreover, the RINA Code of Ethics, the anti-bribery policy and these Guidelines are to be brought to the attention of those who have a contractual relationship with the RINA Group.

10. Control functions

The following bodies are responsible for verifying the implementation of the current Guidelines within the RINA Group:

10.1 Control body

L'Organismo di Vigilanza vigila sull'applicazione del Codice Etico e delle presenti Linee Guida, grazie anche ai dati e alle informazioni raccolte dalla funzione Internal Audit.

L'Organismo di Vigilanza di RINA S.p.A. è l'organo di riferimento di tutte le Società del Gruppo in materia di normativa anticorruzione. A tal fine, sono organizzati degli incontri dedicati tra l'Organismo di Vigilanza di RINA S.p.A. e gli Organismi di Vigilanza delle Società controllate.

10.2 Corporate Compliance Board

The Corporate Compliance Board provides guidelines to ensure that the activities of the sub-holdings are carried out in compliance with the requirements of integrity, protection of company information, personal data and intellectual property, fight against bribery, fairness in commercial conduct, protection of the health and safety of workers and the environment, human rights and fair labour.



Moreover, defines, continuously updates and disseminates policies, methodologies, procedures, instructions and guidelines on the management of impartiality risks and provides its advice on potential and specific cases of conflict of interest, reported by the Chief Risk Officer or by other functions and / or committees of the Holding and Sub-holdings.

10.3 Direction & Coordination Committee

Committee composed of the Chief Executive Officer and of the Managing Director of the Holding Company, of the Heads of the Departments of RINA S.p.A., and of the Chief Executive Officers of the Sub-Holding RINA Services S.p.A. and RINA Consulting S.p.A. The Committee has the objective of developing the policy and the regulation ruling the direction and coordination activities executed by the Holding Company in finance, administration, strategy, organization, compliance and business continuity and to submit them for approval to the Board of Directors.

Moreover, it supports the CEO of the Holding Company in the definition of policies, strategy, governance, organization and budget of the Group, while ensuring a continuous exchange of information flows between the Holding and the Sub-Holdings.

10.4 Risk management and audit committee

The Committee supports the Board of Directors and the Managing Director of RINA S.p.A. in identifying, assessing, managing and controlling the risks connected with RINA's activities. The Committee may request from the Corporate Internal Audit department focus on risks, areas or specific activities carried out within the RINA Group.

Finally, the Committee assesses the independence, adequacy, effectiveness and efficiency of the Corporate Internal Audit function.

11. Reporting system

Any known or alleged violation of anti-bribery laws, including any direct or indirect request of improper payments, liberalities or other benefits by a Public Officer or private person, are to be immediately reported by each employee to their superior and competent Control Body, through the whistleblowing platform.

Any consultant, service provider or Business Partner should directly inform the competent Control Body for any activity carried out on behalf of a Group Company or through the whistleblowing services accessible at whistleblowing.rina.org.



RINA S.p.A. and all Group companies promote such reporting system, ensuring a prompt evaluation of the gathered information, as well as the concealed identity, safeguarding the reporting person against any threats, discrimination or other conduct that may compromise his/her working activities, while preserving the rights of the reported person. RINA S.p.A. Control Body, promptly involving the Bribery Prevention Function under ISO 37001, will report annually to the Board of Directors and, where existing, the Board of Statutory Auditors on the implementation of the current Guidelines and any violations by Group Personnel or Business Partners.

In the event of significant criticalities shown by periodic verification, RINA S.p.A. Control Body will adopt the necessary corrective or sanctioning measures and possible amendments to the current Guidelines.

Without prejudice to the possibility of transmitting reports by any means, RINA handles reports through:

- A telephone channel, where facts can be reported in any language, professionally guided by expert staff. If a report has to be made in a language other than English, an interpreter will be available to faithfully and rigorously mediate communication between the reporter and the recipient. The voice channel is active every day 24/7
- A web platform, where it is possible to register a report by filling in structured forms, also with multilingual interface, which can be reached at the link www.whistleblowing.rina.org

Both methods allow the possibility of reporting in complete anonymity. The access page to the Whistleblowing tool contains some practical indications about the correct use of the tool and the relevant privacy policy.



12. Measures

The RINA Group makes every effort to prevent violations of RINA Code of Ethics, the Organizational Models, the Anti-bribery policy, the principles contained therein, the anti-bribery laws and these Guidelines, by the Group Personnel and those who work for or on behalf of a Group Company.

In the event of any significant violation by the Group Personnel, RINA Group will adopt the internal disciplinary measures, detailed in the Organization, Management and Control Model of RINA S.p.A. and of the other Group Companies and in the applicable Labour Contract and according to the applicable national laws.

RINA Group will adopt suitable sanctioning measures, including, if necessary, dissolution of the contract and claims for compensatory damages from suppliers and Business Partners found violating anti-bribery laws, the Ethical Code, Organizational Models, the Anti-bribery Policy, the principles contained therein, the anti-bribery laws, and the current Guidelines, where applicable.

