



RINA GROUP POLICY

RINA ANTI-BRIBERY POLICY

Revision	Date	Prepared	Controlled	Approved
0	13/10/2021	VALRE	PSL	USN
1	04/11/2024	ERA05	PSL	CL014

RINA is committed to fighting all forms of corruption, whether it is active or passive, direct or indirect, between private individuals, and towards the Public Administration, involving its personnel and each person who carries out activities on its behalf.

To this aim, RINA has implemented and monitors tools and prescriptions including the Code of Ethics, the Organization, Management and Control Model, the Anti-bribery Guidelines and the Anti-Fraud Policy.

To strengthen this commitment, RINA adopts an anti-bribery management system in compliance with the UNI ISO 37001: 2016 standard, of which this policy is an integral part, specifying the measures and controls aimed at controlling company activities, increasing the effectiveness of prevention of the phenomenon and concretely implement the corporate culture based on integrity and ethics.


RINA has established the Anti-Bribery Function, whose responsibilities are made known to the personnel, and whose independence is guaranteed by its non-involvement in the activities identified at risk of corruption.

While performing their activities, RINA personnel adhere to ethical principles of transparency, clarity, correctness, integrity and fairness. Collusive behaviors and practices are prohibited in business and other relationships; bribery and favoritism attempts, direct or indirect solicitations for personal and career advantages for oneself or for others and, more generally, acts contrary to applicable laws and regulations are also forbidden.

RINA undertakes to ensure an adequate internal control system and to guide the entire organization in achieving the expected performance for the prevention of bribery in accordance with the following prescriptions:

- to guarantee a consistent commitment to conduct its activities in full compliance with regulatory obligations, constantly verifying the correct and adequate application of the rules on the fight against corruption and the requirements of the anti-bribery management system
- to encourage employees to report phenomena considered to be corruptive through the whistleblowing platform available at whistleblowing.rina.org;
- to take appropriate action against persons who have behaved in contrast with the principles of either this policy or of the anti-bribery management system.

The above prescriptions are transposed into operational objectives communicated to the entire organization and kept constantly updated.

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Each person, whether employee or not, working in the name and on behalf of RINA is required to read and understand the contents of this Anti-Bribery Policy and to behave in compliance with what it herein established, aware of incurring, in the event of conduct of type of corruption and violation of the Law on corruption, in offenses that may be sanctioned on both the criminal and administrative level, and at the corporate disciplinary level.

Based on clauses which non-compliance with implies the termination of the contract, RINA requires its “Business Partners” to comply with the laws in force, RINA Code of Ethics, Organization, Management and Control Model, and this Policy.

RINA guarantees the maximum dissemination of this Anti-Bribery Policy, ensuring that it is acknowledged and implemented by all its employees; to this aim, the Policy is made available on the company website.

4 November 2024

Carlo Luzzatto

Chief Executive Officer and General Manager