

**COMPLIANCE PRINCIPLES SUMMARY  
TO IFIA CODE  
RINA S.p.A.  
Rev. 2.0**

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## 1 Scope

This document provides an evidence of application of the IFIA Compliance Code and Principles, followed by the RINA Group and required for IFIA membership.

The IFIA Compliance Code and Principles are published on the website <http://www.ifia-federation.org/content/publications/standards/>.

This document refers to corporate governance documents adopted by the RINA Group, published on the RINA Portal, <http://portal.rina.org/>, Policies & Procedures section.

The text extracted from these reference documents shows a summary of the compliance principles followed by the RINA Group.

This document has been updated, following a revision of the above-mentioned corporate governance documents, including the Ethical Code, the Organisation, Management and Control Model and relevant Anti-Bribery and Safeguard Impartiality Guidelines.

## 2 Integrity

### 2.1 IFIA Principles

*The Member shall operate in a professional, independent and impartial manner in all its activities.*

*The Member shall carry out its work honestly and shall not tolerate any deviation from its approved methods and procedures. Where approved test methods make provision for tolerances in results, the Member shall ensure that such tolerances are not abused to alter the actual test findings.*

*The Member shall report data, test results and other material facts in good faith and shall not improperly change them, and shall only issue reports and certificates that correctly present the actual findings, professional opinions or results obtained.*

### 2.2 Ethical Code [ 1 ]

The purpose of the Ethical Code and Code of Conduct (hereinafter the “Ethical Code”) [1] adopted by RINA S.p.A. has been to make the fundamental values and principles, which guide all RINA Group companies’ activities, fully known within the organisation and to all external parties.

*We consider **integrity** an essential element of our professionalism, aware of the contribution that each one of us must make to the development of the qualitative level of the market.*

*Being impartial and being perceived to be impartial is in the DNA of the RINA Group.*

*Our **impartiality** and **independency** is an added value to the services provided to clients.*

*The assessment, certification and inspection activities should be conducted in such a way as to ensure objectivity and **impartiality**, being aware of the activities carried out by other entities and/or organizations of the Group. The observance of this principle must be guaranteed even in the promotion of these services.*

*We want to guide the development of the **qualitative level** of the market, by promoting an awareness that the adoption of measures to protect health, safety and the environment and, in general, attention to quality are attitudes which result in advantages and increase the value of those organizations which pursue them.*

*We undertake to give our people productive work and a prospect of stability and security.*

*We invest in their development and **professional growth**, enhancing their technical skills, their ability to solve problems and to understand clients’ needs, their autonomy, in line with the company’s values. Moreover, we undertake to provide a safe and friendly working environment to our staff, paying particular attention to environmental issues and health and safety related to their activities.*

*We operate through the creation of and compliance with **professional methods** and common rules, we standardize the processes and industrialize our services in order to ensure they can be reproduced and guarantee a homogeneous qualitative level at a competitive cost. We use instruments which enable us to*

*evaluate objectives and the progress made, monitor the trend of our activities and keep costs and profitability under constant control.*

*We are an autonomous and **independent** Group, which operates freely in the market either alone or through relationships, agreements or partnerships and synergies with other organizations to develop and innovate our range of services.*

*Relations with organizations providing interests, policies and Trade Unions must be characterized by principles of equidistance, **independence** and clarity, without discrimination or inequality of treatment.*

*All the people involved, at various levels and with various responsibilities, in such activities, must base their own conduct and course of action on the criteria of correctness and the ethical principles which inspire the Ethical Code and Code of Conduct.*

*In particular, always aware that each violation of the Principles of the Ethical Code is to be reported as mentioned subsequently in the section relating to the standards of application and the control system, all people are required to:*

- *verify that all partners as well as associated or allied bodies have a good reputation, are not involved in illicit activities and operate with respect for the generally recognized principles of correctness and ethics*
- *exercise the utmost care so that no risks of impoverishment to the activities and to RINA property result from the above-mentioned operations*
- *operate in compliance with the law and in complete transparency, without pursuing the intention of making agreements at any cost for personal interest or image or unjustly promoting the interests of one or more of the interested parties*
- *foster the ethical principle of reciprocity and cooperation among the partners in all ways possible.*

*All people working for the RINA Group of companies are to refuse any preferential treatment or other benefits, gifts or forms of hospitality of an entity which go beyond a simple gesture of kindness or act of courtesy; in all situations where this limit is exceeded, or there is a doubt, the person concerned is to inform his/her immediate superior so that a proper decision can be taken.*

### **2.3 Organisation, Management and Control Model [ 2 ]**

The purpose of the Organisation, Management and Control Model (hereinafter the “Organisational Model”) adopted by RINA S.p.A. has been to set up a structured and systematic internal management and control system, suitable for any Group company, including its directors, employees, staff representatives and business partners.

Within the framework of RINA Group’s activities and fields of interest, all individuals - to which the Model applies - are required to follow the Ethical Code and Code of Conduct [1], intended to prevent committing any offences in any sensitive activity, considered by the company as potential risk to damage its reputation, image

and prestige, which have always been key assets for our success. As a matter of facts, integrity and correctness are shared values, considered by all individuals as essential elements for the conduct of their business.

By means of adopting, updating and effectively implementing the Model, RINA S.p.A. has intended to:

- enhance the corporate governance;
- reduce the risk of committing any offence envisaged by Italian Legislative Decree (D.Lgs. No. 231/2001) and other applicable laws associated to corporate responsibilities [ 2 ];
- inform all employees and business partners about the need for strictly observing the same principles, since any violation to these principles might lead to severe implications, including fines and criminal sanctions, envisaged by the above-mentioned laws;
- make all those, who operate for and on behalf of the company, fully aware about any conduct which violates the Model, which might lead to the termination of the contract;
- highlight the consequences which might arise from incorrect behaviour to the Company and/or its stakeholders;
- control the corporate activities in order to intervene promptly, should any risk arise, possibly applying the disciplinary measures envisaged by the Model.

All parties, who act in the name and on behalf of RINA S.p.A., in particular dealings with Public Administrations and Agencies, must possess a specific power of attorney and/or proxy.

## 2.4 Impartiality Threat Assessment [ 3 ]

NA

## 2.5 Disciplinary Code [ 4 ]

In addition to the requirements imposed by law, all personnel must *inter alia*:

*e. abstain from receiving payments or sharing in benefits, under any form whatsoever, for the carrying out of their duties or for relationships in any case dependent on their duties within the organization and abstain from contracting debts with people who have an interest in or relations with the organization;*

*i. comply with any other requirement and/or prohibition contained in the contractual rules and/or internal rules implemented by the organization.*

## 2.6 Anti-bribery guidelines [ 4 ]

NA

## 2.7 Guidelines to safeguard impartiality [ 4 ]

NA

# 3 Conflict of Interest

## 3.1 IFIA Principles

*The Member shall avoid conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services.*

*The Member shall avoid conflicts of interest between the Member's companies and/or divisions engaged in different activities but which may be providing services to either the same client or each other.*

*The Member shall ensure that its employees avoid conflicts of interest with the activities of the Member.*

As described in the Ethical Code and in the Organisational Model, each Group company draws up specific procedures and instructions or management systems for mitigating any risks relating to the threat to impartiality.

## 3.2 Ethical Code [ 1 ]

*In business relations and conduct of company activities, the Group has undertaken to act in a **clear and correct way**, with conduct characterized by loyalty, sense of responsibility and good faith.*

*Directors, employees and collaborators pursue the Group's objectives and general interests. They promptly inform, considering the circumstances, their senior managers or direct superiors about situations or activities in which their personal interests may conflict with those of the Group (or in the case in which next of kin hold such interests) and in any other case in which there are relevant advantages to be had. Directors, employees and collaborators comply with the decisions that the Group makes in this respect.*

*The non-exclusive personnel consist principally in a considerable (through size and importance) number of people who, although not bound by an exclusive working relationship, perform activities of company interest, in the various operative sectors.*

*The non-exclusive personnel are obliged to respect the principles of the Ethical Code and Code of Conduct; the same obligation applies also to exclusive personnel during the selection and appointment of non-exclusive personnel.*

*Prior to taking on work for a client organization, the non-exclusive personnel are to inform their contact person in RINA of any existing relationship or which has existed in the last 3 years with that organization.*

*If the non-exclusive personnel, involved in third party activities, offer separately and autonomously, consultancy services on the basis of the same standards or rules which are the subject of certification by RINA, they must make it clear that their certification activities are entirely unrelated to the certification activities undertaken by RINA and that their consultancy services are not to be understood in any way as a means to make it easier to obtain RINA certification.*

*RINA personnel, in the course of their activities, must maintain conduct which is compulsorily compliant with the laws and with all other provisions in force in the countries in which they operate, in addition to conduct in line with the company's policies.*

*RINA personnel are bound to offer the company work services in line with the expectations of the role and the tasks carried out, with the commitment to their continuous improvement; in relations with the people involved, with colleagues and with superiors they shall show correctness and a spirit of collaboration.*

*RINA personnel must respect the company's assets; their use must be functional and exclusive to the performance of the company's activities, thus avoiding improper or fraudulent use or at any rate in contrast with the company's interests.*

*All people working for the RINA Group of companies are to refuse any preferential treatment or other benefits, gifts or forms of hospitality of an entity which go beyond a simple gesture of kindness or act of courtesy; in all situations where this limit is exceeded, or there is a doubt, the person concerned is to inform his/her immediate superior so that a proper decision can be taken.*

### 3.3 Organizational Model [ 2 ]

The Organizational Model requires to observe the matters referred to in the "Introduction - General Principles", in addition to matters referred to in Quality Management System Manuals and operating instructions, including the following general procedures:

- GP-ALE-231-06 Proxy management
- GP-AMM-231-20 Contractual relationship with the Public Administration
- GP-AMM-231-08 Management of state aid
- GP-AMM-231-11 Reporting exclusive and non-exclusive staff working hours and expenses
- GP-RSO-231-14 Staff training

#### Introduction to the Special Parts

The Organisational Model **requires** to:

- meet the Ethical Code's principles as regards any decision or action relating to company management;

- comply with the laws and regulations in force in all the countries where the company operates;
- observe the Internal Audit System and all General Procedures, Quality Management System Manuals and Operating Instructions governing the company's activities (these procedures are available to all Group companies via the RINA Portal).

The Organisational Unit Managers, at all levels within the company, must ensure that all staff are aware of the Model and the protocols/procedures – within their respective roles and responsibilities – for ensuring an adequate awareness about the importance of complying with the Model and the potential consequences for any breaches thereof.

#### Special Part A

The Organisational Model **requires** to:

- follow a correct and accountable behaviour, observing the legal provisions and internal company procedures/instructions, in all activities involving Public Administration Agencies;
- assure the traceability of information flows to Public Administration Agencies;
- provide their staff directives concerning the behaviour to adopt in formal and informal contact with the various public bodies, transferring knowledge of the regulations and awareness of situations at the risk of offence.

The Organisational Model **forbids** to:

- make incorrect declarations to Public Bodies for the purpose of unduly obtaining public funds;
- present false documents to Public Bodies for the purpose of obtaining undue profit;
- present false declarations to Public Bodies for the purpose of obtaining public funds, grants or soft loans;
- allocate any sum received from Public Bodies for other purposes than those that were intended for;
- exhibit documents containing misleading or false information;
- adopt deceitful conduct which may mislead Public Administration Agencies;
- omit due facts, data or information.

#### Special Part B

The Organisational Model **forbids** to:

- alter IT documents, by using other people's electronic signatures or in any other way, for instance on electronic certificates.

### Special Part C

The Organisational Model **requires** to:

- ascertain the identity of potential candidates before employing them;
- check the ethicality, equity and financial soundness of contractual counterparts, on the basis of a number of relevant indicators/documents (e.g.: anti-mafia certificates, chamber of commerce searches, interbank investigations, prejudicial public information protests, bankruptcy proceedings or acquisition of commercial information on the company and its shareholders and directors, also via specialised companies);
- ascertain the identity of commercial counterparts, whether they are individuals or legal entities, and the parties on whose behalf they may act;
- diligently accomplish all checks on customers/suppliers.

The Organisational Model **forbids** to:

- establish relationship, e.g. negotiating, entering into, or executing contracts or agreements with individuals indicated or belonging to organisations shown in reference lists;
- employ individuals or belonging to organisations shown in reference lists;
- establish relationship with individuals or bodies who do not intend to comply with the company's ethical principles;
- make payments to coded accounts, or accounts, which do not show the holder's details.

### Special Part D

The Organisational Model **forbids** to:

- take any action or attempt any conduct, which might be interpreted as corruptive practices, unlawful favours, or which may lead to privileges for oneself and/or others;
- grant any kind of favour to parties appointed to perform a public service, also via third parties, capable of influencing the unrestricted performance of their activities;
- incur arbitrary entertaining expenses irrespective of company's objectives;
- grant fees, which are not related to the type of activity foreseen on a contractual basis;
- make cash donations to Public Officials;
- offer gifts or free services beyond those envisaged by company practices. In detail, no gifts, presents or free services must be offered to representatives of Public Administration Agencies or

their family members which may appear to be linked to the employment relationship with RINA S.p.A. or which are aimed at influencing independence of judgement or acting as an inducement to assure advantage for RINA S.p.A. Any permitted gifts must always be of a modest value or must be qualified as sponsorships and must be handled according to the procedure. In all cases, the gifts offered must be adequately documented so as to allow checks to be made by the Supervisory Body. Charitable or cultural donations must remain within the limits permitted by legal provisions and all must be documented so as to allow the Supervisory Body to carry out the related checks;

- agree benefits of any kind, such as promises to employ individuals, in favour of representatives of the Public Administration Agencies or any relatives;
- perform services and acknowledge compensation in favour of parties which is not adequately justified within the context of the contractual relationship established with the same.

### 3.4 Impartiality Threat Assessment [ 3 ]

#### 3.4.1 Self-assessment threat

Specific impartiality threat assessment are carried out to single out possible self-assessment threats and possible interrelations among Group companies [ 3 ]. These threats come from a person or body reviewing the work actually done by themselves. Activities carried out by Group companies, revealing a self-assessment or conflict of interest among themselves or between them, are for instance:

- any kind of consultancy to clients, who have received or will receive third party conformity assessment;
- auditing the management system of a client, to whom the certification body provided management system consultancy;
- internal audit services, surveillance services, or health and safety prevention services, provided through certification body employees.

The following activities are not considered a self-assessment threat:

- second or third party audits, according to other rules, not included in the accreditation scope;
- second party audits for the certified organisation' suppliers.

The threat to impartiality is not considered substantial if the third party conformity certificate expired at least 2 years before.

#### 3.4.2 Self-interest threat

Self-interest threat is a threat that can arise from a person or body acting in their own interest. Within the RINA Group, sensitive activities that can lead to this threat can be grouped in the following categories:

##### *Property, governance, management*

- the certification body owns shares in consultancy companies;

- the certification body owns shares in certified companies;
- the shareholders (persons) of the certification body have shares or tasks in consultant companies or certified companies;
- the shareholders (juridical persons) of the certification body have shares in consultancy companies or certified companies;
- the shareholders (juridical persons) of the certification body are consultancy companies or companies certified by the certification body itself;
- the shareholders of the certification body are category associations.

#### *Personnel*

- the personnel of the certification body that perform third party audit activities and decide on the certificate issue owns shares in the certified and/or to be certified companies or have company's task;
- the personnel of the certification body that do third party conformity assessment and decide on certificate issue have other kinds of tasks (project contract, employment, occasional services) in certified companies (or to be certified) by the same certification body;
- the personnel of the certification body that do third party conformity assessment and decide on certificate issue, if they are free-lance consultants, have been given work by companies certified (and/or to be certified) by the same certification body;
- the Organisational Unit Manager assigns the task of a third party conformity audit of a client organization to a relative;
- the certification body assigns the task of a third party conformity audit and / or certificate decision to a consultancy company;

#### *Contracts, marketing, commission on sales, incentive*

- fee compensation to consultants / consultant companies to highlight the certified / to be certified organisation;
- discounts (or charges) agreed with certain organizations;
- promotional activities (ex. free training courses, reduced prices) agreed with some organizations;
- consultant activities advertised together with the third party conformity assessment (or vice versa);
- providing standard or customized training courses at the certification body or at the client's organization;
- The certification body sponsors consultancy activities (ex. Training course, workshop, meeting) or vice versa where the consultancy company sponsors the Body's initiatives.

In document [ 3 ] an evaluation of the risk related to these threats is shown.

### 3.4.3 Familiarity threat

Threats from a person or a body that tolerates non-conformities or overlooks evidence of findings due to excessive familiarity or trust. In the sphere of the activities performed by Group companies, sensitive activities that can lead to this threat are:

- the Body always appoints the same auditing team to audit third-party conformity;
- the Body shares headquarters or branches with management system consulting firms;
- the Body shares headquarters or branches with other kinds of consulting firms (e.g.: accountants, lawyers' firms, SOA companies);
- the Body delivers services together with consulting firms (e.g.: training courses, conferences and meetings jointly promoted by the Certification Body and the consulting firm);
- the Body participates (as a guest or speaker) in services delivered by consulting firms (e.g.: training courses, conferences, meetings promoted by consulting firms).

In document [ 3 ] an evaluation of the risk related to these threats is shown.

### 3.4.4 Intimidation threat

Threats from a person or a body that can be perceived as being openly or secretly coercive, such as the threat of being replaced or reported to a superior.

In the sphere of the activities performed by the companies in the RINA Group, situations that could generate this threat can belong to one of the following two types:

#### *Active intimidation*

- employees who, misusing their position, force anyone to procure, for themselves or others, money/benefits not due to them.
- people belonging to the Body who, in order to achieve their objectives (economic and quantitative), request an employee to behave in an unethical way.

The risk of an impartiality threat increases depending on the extent to which the same people cover management functions within a group company with the possibility of applying commercial pressure and economic conditioning. To this end, the following roles are highlighted:

- TYPE A: people with operative management functions, in third-party conformity assessment cycles (that can affect the audit process) or in the parent company, and also operative management functions in associated organisations. This condition is strictly forbidden within the Group.
- TYPE B: people with operative management functions, in third-party conformity assessment cycles (that can affect the audit process) and also non-operative (decision-making) management offices or functions in other companies in the RINA Group. If the above figures exist in the companies taken into consideration, a high probability (weight 8) is considered when calculating the inherent risk – see section 12.2 of [ 3 ]

- TYPE C: people with non-operative (decision-making) management functions in third-party conformity assessment cycles (that can affect the audit process) and also non-operative (decision-making) management offices or functions in other companies in the RINA Group. If the above figures exist in the companies taken into consideration, a low probability (weight 1) is considered when calculating the inherent risk – see section 12.2. [ 3 ]

#### *Passive intimidation*

- the economic-asset influence of the customer threatens a person or body that fears it can lose the customer or fail to secure a job. The customer can be favoured by granting discounts or issuing a certificate that does not comply with standards;
- the possibility of a "soft" classification of non-conformities by an employee who does not have the courage required to address conflictual situations and fears of intimidation (disagreement concerning the application of standards, the classification of non-conformities, the outcome of audits);
- the possibility that an employee is forced to work under pressure due to the late scheduling of activities and that he/she may therefore be obliged to decide whether to issue a non-conformity that would cause the certificate to expire without the customer having enough time to take corrective action;
- A significant amount of the Body's turnover derives from organisations linked to the same consulting firm.

### **3.5 Disciplinary Code [ 4 ]**

NA

### **3.6 Anti-bribery guidelines [ 4 ]**

NA

### **3.7 Guidelines to safeguard impartiality [ 4 ]**

The scope of these Guidelines is to disseminate within the RINA Group (particularly referring to those companies not directly involved in third-party activities) the knowledge of **impartiality and independence principles** which represent essential requirements for conformity assessment activities. At the same time, while ensuring compliance with the independence of individual Group Companies, these Guidelines define behavioural principles that companies must adopt when carrying out activities that, if associated with each other, may cause a threat to Impartiality.

These Guidelines are mainly inspired and its contents are taken from the analysis carried out by a Working Group, based on the contributions provided by the main companies and units of the Group involved in activities which require **compliance with the principles of impartiality**. This document is subject to continuous review and development, to take changes in legislation and Group evolution (e.g. new acquisitions) into account. It is open to contributions from those working within the RINA Group who wish to provide comments, suggestions or highlight possible errors or shortcomings.

These Guidelines are approved and constantly updated by the Corporate Compliance Board which consists of the following permanent Members:

- Chief Executive Officer of RINA Services S.p.A.;
- Chief Executive Officer of D'Appolonia S.p.A.;
- Chief Technical Officer of RINA Services S.p.A.
- Chief Risk Officer
- Director Legal Affairs;

The Guidelines take into account the impartiality requirements contained in the accreditation/authorisation regulations and, for each regulation specifies the activities carried out as well as the RINA Group company involved.

The impartiality threat risk control system, for the RINA Group, is mainly based on the following:

▪ **Risk Assessment Document**; the aim of which is to identify the **threats to Impartiality** for the various companies of the Group and as regards their mutual relations.

This is periodically updated in order to take into account any modifications made to the organisational structure as well as any indications provided by the Accreditation Bodies and the controlling authorities.

▪ **Committee for Safeguarding Impartiality** : has the aim of guaranteeing the Impartiality of the activities carried out from biased interests and, therefore, to allow the participation of all the entities significantly involved in such activities.

In particular, the CSI carries out the functions foreseen by the regulations relating to the certification bodies:

- To provide support for the development of **impartiality policies** relating to the company's own certification activities;
- To contrast all tendencies that permit commercial aspects or those of any other nature preventing a coherent and objective performance of certification activities;
- To provide support as regards aspects that may influence trust relating to certification activities, including transparency and public perception;
- To conduct a reassessment relating to the **Impartiality of auditing procedures, certifications and decisional processes** at least once a year.

▪ **Corporate Compliance Board**: has the following duties and responsibilities:

To ensure that the activities carried out by the Companies belonging to the RINA Group are performed in compliance with the requirements of:

- a) **impartiality** indicated in the applicable standards and regulations; and
- b) **integrity, confidentiality, fair marketing issues**.

These aims are achieved by:

- defining and continuously updating the methodologies, procedures and instruments to safeguard impartiality within the RINA Group;

- Identifying, on an on-going basis, any risk of impartiality arising from activities and particular cases brought to the attention of the Corporate Compliance Board or by the Internal Audit function;
- monitoring regulatory developments and disseminating information to interested Group companies;
- relating with the **Committee for Safeguarding of Impartiality** and Internal Audit function;
- disseminating within the RINA Group information on impartiality and conflict of interest, e.g. through training, instructions and guidelines;
- supporting the CEO in monitoring the Internal Audit function independence, efficiency, adequacy of its resources for the assigned tasks;
- monitoring and periodically reviewing the implementation of the IFIA compliance principles and relevant compliance programme adopted by the RINA Group;
- any other matter.

## 4 Confidentiality

### 4.1 IFIA Principles

*The Member shall treat all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.*

### 4.2 Ethical Code [ 1 ]

*The Group is aware of the importance of intellectual property and for this reason it respects and defends the content of every type of own intellectual property or belonging to others, such as copyrights, patents, trademarks, trade secrets or other intangible assets.*

*RINA personnel must respect the company's assets; their use must be functional and exclusive to the performance of the company's activities, thus avoiding improper or fraudulent use or at any rate in contrast with the company's interests.*

*The information systems and their relative applications must be used in compliance with the internal security systems; the use of these for purposes other than work is not allowed; with particular reference to Internet sites, already regulated by internal rules, access to sites with vulgar or undignified content is forbidden, as is the use of computers assigned to other people, without the authorization of the owner.*

*The information acquired during the course of work activities must remain classified, used exclusively to perform one's own work and managed in such a way as to guarantee its integrity and security.*

*RINA Group is committed to protecting the information relating to its staff and to third parties, generated or acquired within the Group and in business relations, and to avoid any improper use of this information.*

*RINA Group intends to ensure that the processing of personal data within its structures respects the rights and fundamental freedoms and the dignity of the interested parties, as required by current legislation.*

*The handling of personal data must be done in a lawful and correct manner.*

*Moreover, RINA Group is committed to adopting suitable preventative security measures for all databases in which personal data are collected and stored in order to avoid the risk of destruction or loss of or unauthorized access to, or treatment not allowed.*

*RINA Group personnel have to:*

- *acquire and process only the data necessary and appropriate for the purposes directly related to their functions and responsibilities*
- *acquire and process such data only in specific procedures and store the data in such a way as to prevent its unauthorized access to others.*

*Relationships with media organizations are characterized by correctness, spirit of collaboration and respect for the right of information. These relations are the exclusive responsibility of the departments to which this is expressly delegated.*

*RINA Group personnel may not release to journalists or other means of communication, even if contacted, any statements or communication regarding the company to which they belong or other companies of the Group, unless previously authorized.*

### 4.3 Organisational Model [ 2 ]

The Organisational Model **requires** to:

- report any security incidents to the Information Technology & Communication (ITC) Manager;
- correctly use the IT resources assigned.

The Organisational Model **forbids** to:

- alter IT documents by any means, e.g. electronic signatures or in any other way, such as on electronic certificates;
- abusively access protected IT system or databases without having the right to do so;
- access the IT system or databases not being in possession of the required credentials or by using other colleague passwords;
- disclose access codes to IT and screen-based systems;
- damage IT data and systems benefiting the public or otherwise.

The Organisational Model **requires** to observe the following general procedures:

- GP-CEO-231-17 Rule concerning the security of company data - “privacy code”
- GP-INF-231-25 Policies for access to networks, servers and external databases
- The Company’s Data Security Planning Programme (DPS)

### 4.4 Impartiality Threat Assessment [ 3 ]

NA

#### 4.5 Disciplinary Code [ 4 ]

In addition to the compliance with the requirements imposed by law, the staff must:

*d. maintain professional secrecy and refrain from passing on information to unauthorized people which could be detrimental to the interests of the organisation;*

*i. comply with any other requirement and/or prohibition contained in the contractual rules and/or internal rules implemented by the organisation.*

#### 4.6 Anti-bribery guidelines [ 4 ]

NA

#### 4.7 Guidelines to safeguard impartiality [ 4 ]

NA

### 5 Anti-Bribery

#### 5.1 IFIA Principles

*The Member shall prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment.*

*The Member shall prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers, or employees of any such party, or government officials.*

#### 5.2 Ethical Code [ 1 ]

*The Group respects national and international law applicable in every country in which the Group does business. To ensure respect of this principle, the Companies of the Group adopt Organization, Management and Control Models, whose purpose is the prevention of offenses in general and corporate administrative liability, as foreseen by par.6 of Legislative Decree 231/2001.*

*The group carries out all financial operations and transactions observing the principles of integrity and transparency and, in any case, it does not carry out any fraudulent operations or transactions. Therefore, every financial operation has to be correctly authorized, verifiable, legitimate, coherent and adequate.*

*The Group refuses corruption as an instrument to execute its business. Bribing is not allowed in any circumstance or even if just to attempt to bribe elected holders of national and international public office, public officials or public service providers, as private individuals. Nobody can promise or give money or other*

*advantages in order to obtain undue benefits for the Group or for himself. Moreover, nobody can ask for money or other advantages in order to carry out undue services.*

*To ensure transparency of the operativeness of the management, RINA Group defines, executes and sequentially updates an articulate and homogenous corporate governance system inherent to both its own organizational structure and the relationships with third parties, in compliance with national and international best practice standards, knowing that the corporate ability to give itself functional efficient and effective rules represents an essential instrument to strengthen its reputation in terms of reliability and transparency and the confidence of the Stakeholders.*

*The ideal moving force of the Ethical Code is concerned with the reciprocal advantage that all interested parties can receive, by conforming to reciprocal and cooperative ethical conduct.*

*Our activities contribute to the well-being of society as they help to improve the quality and safety of human life and to preserve the environment for future generations. This is why we offer those bodies and institutions, responsible for defining rules and standards, our competence and know-how.*

*We have an Italian identity. We have a worldwide reputation established by a tradition that goes back to 1861 and concerns technical and scientific skills and the ability to resolve problems through our availability, ingenuity, creativity and style, in compliance with the rules.*

*No abuse of authority shall ever be tolerated in any labor and collaboration relationship. As a result, senior managers are never permitted to act or behave towards subordinates in a manner sanctioned by law or by the applicable collective or individual labor contracts. The Group has also established a listening center to report on cases of abuse of authority.*

*As regards relations with clients, mandatorily characterized by compliance with the laws and provisions in force, in particular those regarding the protection of competition and the market, the companies of the Group, aware that the core business is principally drawn by clients and the consequent necessity to maintain relations of trust with them, and also reciprocal esteem and consideration, intend to meet their needs by supplying qualitatively high-level services, under competitive conditions, avoiding discriminatory or incorrect behaviour.*

*On this note, the utmost importance is given to conduct, towards clients, which is collaborative and efficient, to the adoption of a communication system which is simple, clear and complete and to respect for contractual commitments and obligations.*

*The principles to be followed by all RINA Group personnel in relations with the clientele are those of professionalism, efficiency, correctness, availability and courtesy.*

*In commercial relations with new or regular clients, the forging or management of relations with persons of a dubious reputation, poor reliability or those implicated in illegal activities are not permitted.*

*It is forbidden to offer or allocate to collaborators of clients (representatives, employees), presents, free gifts, or other benefits with the purpose of deriving undue advantages, either personal or for the company.*

*Relations with governmental bodies, must be characterized by a spirit of collaboration, honesty, correctness and clarity. Consequently, the companies of the Group show their commitment to initiating and maintaining forms of communication with these bodies at international, national and local level, in addition to representing their own interests in a thorough, coherent and honest way.*

*In relations with collaborators of governmental bodies (representatives, company boards, employees or consultants) no conduct aimed at obtaining favorable treatment, offering or allocating to them or their relatives or other persons affiliated through interest with them, even non-economic, benefits, money or gifts or other favors, is permitted.*

*Representative expenses and other gifts are permitted only within the limits of moderate value, and providing that these do not compromise the integrity and image of either party. Elusive actions, through contributions in the form of sponsorship, consulting, awarding of a contract etc., in relation to the above-mentioned prohibition, are expressly forbidden.*

*Specific company functions are in charge of the choice of suppliers and the acquisition of goods and services (including consultants, agents, etc.), who are required to act on the basis of objective evaluations of quality, price, innovation, reliability, competition and method of service supply. In particular, the RINA Group personnel are obliged to:*

- observe the corporate procedures to manage the relationships with suppliers and external collaborators*
- adopt during the selection, only objective evaluation criteria based on declared and transparent ways with particular attention to technical and moral suitability*
- observe and require compliance with the conditions established in the contract*
- keep an open dialogue with suppliers and external collaborator in line with good commercial practice; report promptly to one's superior, and the Guarantor, any possible violations of the Ethical Code and Code of Conduct.*

*The Control Body, in charge of the Organization, Management and Control Model, ensures the application of the Code thanks to the data and information collected by the internal audit function, gives binding opinions on its interpretation, periodically reviews it and proposes any changes to the Managers and finally proposes decisions on its violations.*

*The Internal Audit function verifies compliance with the Code, receives observations and reports the results of this activity to the Control Body.*

*The Group takes reasonable steps to spread awareness of the Code among all its employees, contractors, suppliers and stakeholders, also through appropriate training initiatives.*

*The Group ensures adequate communication channels with all its stakeholders in order to receive reports of possible violations and comments on the Code.*

*Respect for the principles contained in this Code is a requirement for all managers, employees and consultants of the RINA Group and all individuals who maintain a business relationship with the RINA Group. As a result, their violation constitutes a breach of contractual obligations, with all the consequences prescribed by law, including, where appropriate, termination of the contract and compensation for damages.*

*Any conduct not in line with the Ethical Code or the Organisation, Management and Control Model are to be reported by e-mail or by letter to the Control Body. Those making the reports are protected from any form of reprisal, discrimination or penalization and in any event confidentiality will be ensured with regard to the identity of those making reports, without prejudice to the legal obligations and the protection of the rights of the company or the individuals accused wrongly or in bad faith.*

### 5.3 Organizational Model [ 2 ]

The Organisational Model **requires** to:

- adopt correct and accountable conduct, observing the legal provisions and internal company procedures/instructions, in all activities which involve Public Administration Agencies;
- envisage the traceability of the information flows to Public Administration Agencies;
- provide their staff with directives regarding the manner of conduct to be adopted in formal and informal contact with the various public bodies, transferring knowledge of the norms and awareness of the situation at the risk of offence.

The Organisational Model **forbids** to:

- make inaccurate declarations to public bodies so as to unduly obtain public funds;
- assign sums obtained by means of public funds for purposes other than those envisaged at the time of application;

The meaning of Public Official (P.O.) is clearly explained in the Introduction to the Special Sections, clarifying that this capacity should be acknowledged to all those, public or private employees, who are able within the sphere of powers regulated by public law to form and manifest the wishes of the P.A.A. or exercise authoritative, decision-making or certifying powers, separately and non-cumulatively.

It is therefore possible to recognize the status of P.O. in relation to private parties, whose activities supplement a public function, without the existence of an employment relationship with the Public Administration Agencies being necessary, since «it is sufficient that the agent takes part in the authorization and certification activities regulated by public law provisions» (Supreme Criminal Court, Section V, 31 January 2000).

With reference to the offence of corruption, it can therefore be stated that this offence may emerge in the “active” sense or rather when the director or the employee corrupts a P.O. or a public service provider so as to allow the body to obtain something and in the “passive” sense when the representative of the body, adopting the capacity of Public Official, receives cash to carry out an act contrary to the duties of his office.

The Organisational Model **requires** to:

- adopt correct and accountable conduct, observing the legal provisions and internal company procedures/instructions, in all activities which involve Public Administration Agencies;
- envisage the traceability of the information flows to Public Administration Agencies;
- provide their staff with directives regarding the manner of conduct to be adopted in formal and informal contact with the various public bodies, transferring knowledge of the norms and awareness of the situation at the risk of offence.

The Organisational Model **forbids** to:

- take any action or attempting conduct which may, even alone, be interpreted as corruptive

practices, unlawful favours, or which may lead to privileges for oneself and/or others, for example during:

- handling of offers and contracts where the counterpart is a Public Administration Agency, at the time of private negotiations with the Public Administration Agencies or in the event of participation in tenders of any kind called by Public Administration Agencies;
  - attainment of authorization and acknowledgements by government authorities;
  - allocation of a soft loan in favour of the Company;
- accept promises, cash or other benefits which are not due for carrying out or omitting an act relating to the exercise of their powers for example during:
    - performance of certification activities in regulatory or obligatory spheres, or carried out via proxy or authorization of the government authority;
  - take action or attempting conduct which may, even alone, be interpreted as abuse of one's position for the purpose of forcing the procurement for oneself and/or others of money, favours or other benefits, for example during:
    - performance of one's technical activities when checking designs or projects;
    - performance of surveying activities during inspections on ships and craft in general;
    - performance of auditing activities for certification purposes;
    - performance of one's activities which in any event involves an opinion which may influence the Public Administration Agencies;
  - ensure favours of any kind for parties appointed to perform a public service also via third parties, capable of influencing the unrestricted performance of their activities;
  - incur arbitrary entertaining expenses irrespective of the Company's objectives;
  - grant fees which are not related to the type of appointment they perform on a contractual basis;
  - make donations of cash to public officials;
  - offer gifts or free services beyond those envisaged by company practices. In detail, no gifts, presents or free services must be offered to representatives of Public Administration Agencies or their family members which may appear linked to the employment relationship with RINA S.p.A. or which are aimed at influencing independence of judgement or acting as inducement to ensure any advantage for RINA S.p.A. Any permitted gifts must always be of a modest value or must be qualified as sponsorships and must be handled according to the procedure. In all cases, the gifts offered must be documented adequately so as to permit checks to be made by the Control Body. Charitable or cultural donations must remain within the limits permitted by legal provisions and all must be documented so as to allow the Control Body to carry out the related checks;
  - agree benefits of any kind, such as promises to employ individuals, in favour of representatives of the Public Administration Agencies or any relatives which may lead to the same consequences as the previous point;
  - perform services and acknowledging compensation in favour of parties which is not adequately justified within the context of the contractual relationship established with the same.

Specifically the Organisational Model **requires** to observe the following general procedures:

- GP-ALE-231-06 Proxy management
- GP-COM-DOC-00 Corporate communication of the Group
- GP-DIG-231-22 Free gifts, presents, benefits
- GP-AMM-CLI-02 Management of receivables and solicits in the foreign offices
- GP-AMM-231-13 Procurement - Purchase management
- GP-AMM-231-07 Management of non-contractual relations with the public administration
- GP-AMM-231-11 Reporting exclusive and non-exclusive staff working hours and expenses
- GP-RSO-231-09 Selection and hiring of exclusive staff
- GP-RSO-STAFF-01 Definition of profiles, titles and role assignments for staff personnel operating in RINA offices abroad
- GP-AMM-231-16 Customer archive coding and management

#### 5.4 Impartiality Threat Assessment [ 3 ]

NA

#### 5.5 Disciplinary Code [ 4 ]

NA

#### 5.6 Anti-bribery guidelines [ 4 ]

The Anti-Bribery Guidelines take into account the principles established in the Ethical Code. Their purpose is to disseminate within the RINA Group and to inform all personnel who work for or on behalf of a Group company the basic rules and the fundamental principles that guide Group companies to counteract any kind of corruption, in full compliance with the Ethical Code and with applicable anti-bribery regulations.

The Guidelines apply to RINA Group personnel and all people who operate in favor of or on behalf of a Group company, within their duties and responsibilities, including the members of the Control Body and the Board of Statutory Auditors. Those who operate in favor of or on behalf of a Group company must undertake to comply with the anti-bribery laws and reference principles included in the guidelines, as foreseen in suitable contractual clauses to be formally accepted by them.

The following definitions apply to either active or passive corruption:

**Active corruption:** 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 private individual.

**Passive corruption:** any conduct aimed at requesting, agreeing or accepting any improper benefit, in cash or other forms, from a Public Official or private individual, including abuse of position whereby the passive subjects are considered victims and not accomplices.

Group personnel are required to:

- behave in a proper and transparent manner, in accordance with laws and internal procedures/provisions, in particular when carrying out activities that involve Public Officials or third parties
- 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 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 him/herself 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
- obtain authorization or recognition from an Authority; or
- assign a facilitated loan to the company
- carry out activities or behave in a way that can - or even might - be interpreted as an abuse of position to procure money, favors 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
- offer money or grant any advantages of any kind, such as promise of employment, to representatives of Public Administration, 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
- grant any favor to people in charge of a public service even through intermediaries to influence the independence in carrying out the activity
- authorize payments to third parties for tasks that are not clearly defined in the contract
- offer gifts or liberalities outside company practices or effect arbitrary public relation expenditure outside the company's objectives.

In particular, the guidelines make the following recommendations:

Gifts and hospitality: any liberality, such as gifts, hospitality or other expenses can be given or received when they are forms of commercial courtesy, they do not compromise the integrity and/or 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 one of low value
- it must not be motivated by a desire to exercise undue pressure (e.g. as any form of liberality to third public or private parties that can influence their independent judgment, or induce them to grant any improper benefit)
- it must not consist as a sum of money (e.g. cash, cheque, bank transfer, or any other form)
- 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 low value

- it must not be requested, demanded or accepted in order to carry out or omit a due activity (e.g. for activities carried out in regulatory environments, carried out on behalf of or authorized by a competent Authority).

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, by means of dedicated communication channels foreseen in the company's Organization, Management and Control Model.

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

Charitable contributions and donations: donations to charities, institutes or administrative bodies may run the risk of misappropriation of funds or valuable goods to Public Officials' or private persons' personal use or benefit, even if a Public Official or private person 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
- 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 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.

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
- sponsorship should not contain any sort of political or union propaganda messages
- 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 the Ethical Code and the company procedures and to use the agreed amounts exclusively for the scopes foreseen in the contract
- payments must be exclusively transferred by traceable payment system
- the outcome of each initiative is to be evaluated afterwards, to verify that payments exclusively correspond to what is indicated in the sponsorship contract.

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.

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 corruption and money laundering behavior
- 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
- make facilitation payments to Public Officials to facilitate or speed up a commercial transaction or activity.

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, in particular, the possible presence of the counterpart on international blacklists for money laundering and terrorism financing is to be checked.
- 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 authorised personnel only
- ensure that these contracts and purchase orders include safeguard clauses that require the counterpart to respect the Ethical Code and applicable anti-bribery laws, including these Guidelines, 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.

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
- respect of the laws of the country of employment must be maintained (e.g. about employment obligations, presence and validity of residence permits, etc.).

Business partners: the commitment to comply with laws and the reference principles of the Ethical Code 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 third contracting party, whether they be a natural person or corporation.

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. and/or the Group Company to terminate or suspend the execution of the contract, and receive damages for having violated a contractual obligation.

Mergers and acquisition: 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, to get a true and complete picture of the partner's status and commercial and professional integrity.

The Internal Audit function can 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 is to inform the competent Control Body of the existence of any new anti-corruption risk or any possible increase of the existing risk profile, in order to review relevant internal processes, procedures and models to safeguard the RINA Group against this new risk.

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

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, based on the current Guidelines, providing the required know-how about applicable anti-bribery laws and regulations and instructions to deal with the most sensitive activities.

The Control Body and the Compliance Board are responsible for verifying the implementation of the current Guidelines within the RINA Group.

## **5.7 Guidelines to safeguard impartiality [ 4 ]**

NA

## 6 Fair marketing

### 6.1 IFIA Principles

*The Member shall only present itself and conduct marketing, including any comparisons with or references to competitors or their services, in a manner that is truthful and not deceptive or misleading or likely to mislead.*

### 6.2 Ethical Code [ 1 ]

*The Group recognizes that fair competition is a fundamental element for the development of corporate business. Therefore, the Group respects the applicable antitrust rules and competition loyalty rules and in no case does the Group carry out acts or adopt behavior contrary to free and fair competition.*

*In business relations and conduct of company activities, the Group has undertaken to act in a clear and correct way, with conduct characterized by loyalty, sense of responsibility and good faith.*

The RINA Group considers market competition, where characterised by principles of loyalty, correctness and sound competition, as a factor of improvement of “products and services”, and it wishes to expand in the market through development both in terms of products and services, and in terms of “products of application” finalised, above all, in the research of value and profitability for the Client.

### 6.3 Organizational Model [ 2 ]

NA

### 6.4 Impartiality Threat Assessment [ 3 ]

NA

### 6.5 Disciplinary Code [ 4 ]

NA

### 6.6 Anti-bribery guidelines [ 4 ]

NA

### 6.7 Guidelines to safeguard impartiality [ 4 ]

NA

## 7 Reference Documents

- [ 1 ] Ethical Code
- [ 2 ] Organisational, Management and Control Model
- [ 3 ] Impartiality Threat Assessment
- [ 4 ] Disciplinary Code
- [ 5 ] Anti-Bribery Guidelines
- [ 6 ] Guidelines to Safeguard Impartiality