

	<b>COMPLIANCE PROGRAMME – IFIA DECEMBER 2012</b>	<b>CO-PRO-IFIA</b>
		<b>Rev. 1.0</b>
		Pag. 1/5

## 1. PRINCIPLES

RINA reputation as an independent service provider relies upon the truthful relationship with its customers and stakeholders. To preserve that, RINA always committed itself to the highest standards of professional behavior.

Because of the membership to several international independent organizations and associations, and because of the nature of its core business, RINA adheres to ethical codes and ethical principles of high standing in certification and marine business. RINA cultural model nowadays comprises fundamental values that are transmitted to all employees and stakeholder. Integrity, Absence of Conflict of Interest, Confidentiality, Anti-Bribery, Fair Marketing: IFIA basic values had already been encompassed in RINA policies, by nature, and they were further enforced in the organization because of the new membership.

The document “RINA Compliance Principles Summary to IFIA Code” lists how IFIA principles are implemented within RINA Governance Documents and Policies.

## 2. MANGEMENT COMMITMENT

### 2.2 COMPLIANCE PRINCIPLES AND PROGRAMME

RINA Group has confirmed its commitment to implementing IFIA Compliance Code by adopting and publishing the “RINA Compliance Principles summary to IFIA Code document”, the present “Compliance Programme” and applying the following key elements of implementation.

### 2.3 RINA BOARDS’ APPROVAL

RINA Group Board has approved the RINA COMPLIANCE PRINCIPLES SUMMARY TO IFIA CODE and the RINA COMPLIANCE PROGRAMME TO IFIA CODE.

The original version of the above documents was sent to IFIA. Any update will then be submitted again to IFIA.

### 2.4 COMPLIANCE OFFICERS’ AND COMPLIANCE COMMITTEE APPOINTMENT

RINA Group Board appointed a COMPLIANCE OFFICER which, regardless of his other responsibilities, also has full responsibility and authority for the co-ordination and implementation of RINA COMPLIANCE PROGRAMME throughout the Organization of RINA Group Member Companies.

RINA Group Board has appointed an independent committee which acts as COMPLIANCE COMMITTEE for the whole RINA group to carry out periodic reviews of the progress of the Compliance Programme and provide policy guidance.

## 3. HUMAN RESOURCES

### 3.1 RECRUITMENT

All detailed documents are provided immediately upon hiring – they are available on the RINA Corporate intranet and informative tools. The newly hired person is required to undergo a training about those documents.

	<b>COMPLIANCE PROGRAMME – IFIA DECEMBER 2012</b>	<b>CO-PRO-IFIA</b>
		<b>Rev. 1.0</b>
		Pag. 2/5

### **3.2 EMPLOYEE COMMITMENT**

Each RINA employee is provided with a copy of the Compliance Programme during internal training programme. A record is kept in the employee's training file by Human Resource department.

### **3.3 TRAINING**

All employees, including Managers, of the RINA Group undergo a COMPLIANCE TRAINING COURSE. Among the training material, all IFIA documents, policies and procedures are given to the trainee, and RINA policy documents as well.

After the completion this course with a positive final comprehension test, record of the successful completion of the course is kept the employee's training file.

### **3.4 EMPLOYEE PERFORMANCE APPRAISAL**

Each employee maintains an on-going understanding of the IFIA Compliance Programme. In case of violations the prescriptions of the disciplinary code are applied, as a part of the performance evaluation process.

### **3.5 HELP LINES**

RINA makes provision for "help lines" where its employees may obtain guidance on any question or matter of concern relating to the implementation or interpretation of the Compliance Programme. Help Lines indications are shown in the RINA portal.

Along with a dedicated mail box, a telephone number is available for this purpose, with compliance expert answering in Italian, English about Compliance issues (members of Internal Auditing office).

Help lines can be used by employees also to send suggestions and hints for improvements about IFIA Compliance Programme.

## **4. MANAGEMENT SYSTEM**

### **4.1 INTERNAL PROCEDURE**

An internal General Procedure has been prepared for the whole RINA Group about:

- "questions, answers and suggestions" channel;
- Information flows for reporting through ODV's mail boxes, Internal Audit evaluation, notification to Compliance Officer
- Investigation process and roles of Compliance Officer and Compliance Committee;
- Management of complaints issuing towards IFA members;
- External Communication Channel management for IFIA Purposes (ODV reports, Complaints, IFIA reports)
- Management Declaration management;
- Training Management;
- Internal Audit with reference to general procedures;
- Recruitment and Employee commitment with reference to general procedures;
- External auditing planning and report management

 <b>RINA</b> GROUP	<b>COMPLIANCE PROGRAMME – IFIA</b> <b>DECEMBER 2012</b>	<b>CO-PRO-IFIA</b>
		<b>Rev. 1.0</b>
		Pag. 3/5

## 4.2 SECURITY MEASURES

Internal operational procedures and technical controls ensure that documents/data/applications are stored in designated secure areas with restricted access and kept confidential in a secure manner according to Data Protection laws.

## 5. COMMUNICATION

### 5.1 EXTERNAL COMMUNICATION

RINA makes its Compliance Programme and Compliance Principle Summary available in RINA web site [www.rinagroup.org](http://www.rinagroup.org).

RINA Compliance Principles to IFIA Code are an Annex of the MOG (Governance Model), which is public. In order to make it effectively public, MOG is published on RINA Web Site along with IFIA Annex. The same help line mailbox is referenced along with IFIA policy documents in web site.

On the RINA website, there is also a link to a dedicated mailbox to receive feedback from interested parties.

### 5.2 INTERNAL COMMUNICATION

RINA makes its Compliance Programme and Compliance Principle Summary, together with IFIA documents, available in RINA Management System Database.

### 5.3 REPORTING VIOLATIONS

As highlighted during the the COMPLIANCE TRAINING COURSE, all RINA employees are encouraged to report details of violations or suspected violations either directly to the Compliance Officer, to the employee's superior, an internal auditor or among the ODV mail box also accessible from RINA intranet portal, for each RINA Company.

It is requested, through the Compliance Training Course, that employees report any request or offer of illicit payments or any other advantages, of which they may become aware.

The employees who make such reports are totally protected against any form of retaliation, unless they have acted maliciously and/or with bad faith. If this is requested, the anonymity of the employee shall be maintained as much as possible.

### 5.4 BUSINESS RELATIONSHIPS

RINA ensures that its Compliance Programme is applied to their business relationships (e.g. service suppliers, intermediates, agents, joint venture partners) to the extent that is appropriate.

RINA external technicians (NES) are provided with written information about RINA Compliance policy that the partner has to undersign and a “commitment declaration” will be attached to any agreement.

	<b>COMPLIANCE PROGRAMME – IFIA DECEMBER 2012</b>	<b>CO-PRO-IFIA</b>
		<b>Rev. 1.0</b>
		Pag. 4/5

## **6. ANALYSIS, CORRECTIVE AND DISCIPLINARY MEASURES**

### **6.1 INVESTIGATION AND SANCTIONS**

The Compliance Officer initiates, where appropriate, an investigation into any violation of the Programme reported to him or her, or coming to his or her knowledge.

Investigations and sanctions related to violations of the Programme are managed according RINA internal procedures, which include details for the following:

- Any reported violation shall be investigated
- Maintenance of records of all reported violations, outcomes of the relevant investigation and subsequent measures taken,
- The author of such alleged violation shall have the right to be heard,
- The independent internal audit function is responsible to manage the investigation taking into account alternative information and interviews with interested parties.
- The Compliance Officer together with internal audit function shall analyze the outcome of the investigation and decide about any corrective and or disciplinary measures, as appropriate, to be implemented.

### **6.2 COMPLAINT AND DISCIPLINARY PROCEDURES**

Complaints concerning any alleged non-compliance with IFIA Compliance Code by other Members shall be presented to IFIA in accordance with the IFIA Complaints and Disciplinary Procedures.

RINA refrains from submitting complaints to other Parties, unless it is necessary to do so to protect its reputation.

### **6.3 ACCOUNTING AND BOOK KEEPING**

Official books and records are kept compliant to Italian fiscal and civil laws, documenting in a correct and honest manner all the financial transactions that have occurred.

## **7. PROGRAMME MONITORING**

### **7.1 MANAGEMENT DECLARATION**

RINA requires Group Company's CEOs to sign, on an annual basis, a Compliance Declaration which is based on the template contained in Annex A of the IFIA Compliance Code Guidelines.

These Compliance Declarations are sent to the Compliance Officer who submits an annual summary report to the Compliance Committee.

### **7.2 INTERNAL AUDIT**

RINA carries out internal (quality) and administrative audits at regular intervals for each RINA Group's Company and location, according to a defined programme.

These are carried out by qualified auditor and verify also the implementation of the Compliance Programme within the whole RINA organization.

In particular, if Management Declarations have been completed in conformance with Annex A of the IFIA Compliance Code Guidelines and the Compliance.

IFIA Guidance Check list for Members' Internal Compliance Audits shall be used as reference guide.

	<b>COMPLIANCE PROGRAMME – IFIA DECEMBER 2012</b>	<b>CO-PRO-IFIA</b>
		<b>Rev. 1.0</b>
		Pag. 5/5

Not compliance findings shall be reported to Compliance Officer who shall in turn send a summary report to the Compliance Committee.

### 7.3 EXTERNAL AUDIT

Every year, an examination is conducted to see the efficiency and the effectiveness of the implementation of Compliance Programme by an external independent auditing company as appointed by the Compliance Officer.

Every year an independent external auditing company selected according to IFIA requirements is appointed to examine the financial statements of the Companies of the RINA Group, as appointed by the Compliance Officer.

The external independent external auditing company carry out a guarantee audit, adapted for the IFIA Compliance Code Guidelines which includes:

- Check if RINA has been established of a Compliance Programme which include the requirements of the Compliance Code
- Check if the current Compliance Programme (as implemented) is different for the latest as communicated to and approved by IFIA
- Check if the current Compliance Programme (as implemented) complies the current Compliance Code
- Check the existence of a management systems, processes and controls in relation to:
  - alleged violations of the Compliance Code,
  - records of RINA Compliance Committee,
  - Compliance training carried out by RINA
- Check the content of the consolidated Management Declarations
- Check if all Management Declarations have been received
- Test on the monitoring system used by RINA to make sure that all the issues of interest, and also all reports, have been addressed by the Compliance Officer

The external audit programme shall take into account the RINA Companies and Locations, RINA management systems and the documentation applicable to such places and it shall be agreed between RINA and external audit company, based on an assessment of conformity risk and complexity and peculiarities of the RINA Group.

Copies of independent assurance reports shall be sent to General Manager of IFIA for the confirmation of RINA's compliance with IFIA requirements.