Friday 11 June, 2021

We make reference to your messages and to the letter received by the Claimant of the OECD procedure dated March 3rd, 2021.

Pursuant with the recommendation of the Italian OECD NCP final statement, published on December 8th, 2020, we would like to reassure you on our commitment to proactively act in order to implement as far as possible the proposed measures.

In particular as far as the recommendations under letter B are concerned, we confirm that we are proceeding – according to what we proposed during the OECD procedure – with the necessary authorizations and will arrange scholarships for children attending Pakistani schools as soon as possible.

Coming to the letter C, as already pointed out during the procedure, although RINA feels deep sympathy for the victims of the tragedy, RINA rejects any liability for the accident and for this reason does not deem it appropriate to apologize to the victims and their families.

With regards to the recommendation recalled in letter D, we would like to confirm that RINA has adopted a corporate enterprise risk management approach in line with RINA Code of Ethics, RINA Organizational and control model, RINA risk management policy and guidelines, ISO 31000 Risk Management Principle and guidelines and OECD Guidelines on multinational enterprises.

Within this framework RINA implemented a third party due diligence process, defining the procedures relating to the compliance control measures to be implemented to ensure that checks are carried out on selected counterparties considering both the Territorial and Legal context.

In addition, specifically for social accountability activities, RINA performs:

* Initial Country based risk analysis before starting any Social Accountability activity in any new country.
* An annual Country Based Risk Assessment for all the countries in which RINA operates

Both analyses are based on the consultation of local stakeholders, and take into consideration different factors as, for example, Child Labor, Forced Labor, Health and Safety, Freedom of association, Discrimination, Disciplinary practices and Wages.

With regards to letter E, RINA confirms its proactive commitment to improve SA8000 scheme.

Specifically RINA contributed in the consultation process for the revision of SAAS accreditation procedure dated March 2020.

Additionally we have confirmed our full support on the adoption, starting from April 1st, of a specific web platform developed by SAI International for the management of all SA8000 audit reports.

This platform will provide a common tool for all accredited Certification Bodies to perform SA8000 audit activities. Certification data will be recorded in a consistent format, maintained in a centralized location, and updated in real-time, improving data harmonization and giving future opportunities to disclosure of key information to interested parties. SAI plan is in fact to introduce processes for brands and other stakeholders to register and access the platform. This will allow SA8000-certified organizations to connect with stakeholders directly and share certification and audit data at their own discretion.

Finally, despite the fact that RINA is sticking to its commitments, we cannot but remark that the complainants do not miss any opportunity to continue their negative and defamatory media campaign against our company.

Best regards

Michele Morseletto

General Counsel

RINA Services S.p.A.