

# RA-UPAX-001 COMPANY REGULATIONS FOR PASSENGER TRANSPORT AND VEHICLES AS A RESULT

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### INTRODUCTION

### **Preliminary considerations**

GRIMALDI LINES ensures constant and timely adaptation of its General Conditions regarding the carriage of passengers, services and organization with national and international legislation concerning the carriage of passengers by sea and particularly with EU Regulation 1177/2010 dated 24/11/2010 entered into force on 18/12/2012.

### **GRIMALDI LINES (our brand) presentation**

The GRIMALDI GROUP'S carriage of passengers and accompanied vehicles is marketed as GRIMALDI LINES.

### **Purpose of the Regulations**

These Regulations for the carriage of passengers and accompanied vehicles supplements the general provisions of the GRIMALDI GROUP'S Quality Manual specifically regarding the organisational and operational aspects of the carriage of passengers, and any accompanied vehicles, on board the Ro/Pax vessels managed by the Short Sea line.

The regulation aims to provide all Company personnel, vessel Masters, and Agents a comprehensive framework of the actions and measures adopted to ensure the quality of service. It integrates what is described in the Group's Quality Manual for the activities aimed specifically at passenger service.

# **Scope of the Regulation**

The Regulation applies only to the activities covering the carriage of passengers and accompanied vehicles. It is also applied to the carriage of commercial vehicles.

# 1. MANAGEMENT RESPONSIBILITIES

# Quality policy and objectives

GRIMALDI LINES wants to make customised customer service one of its strengths.

The Client is the Company's only source of income.

The Client is given the utmost attention at all times. It is mandatory to use courtesy and professionalism when dealing with clients. A satisfied Client must be the Company's standard. A Customised and Quality Service are complementary and require a daily effort by all employees. Continuous improvement of service and compliance with procedures should be the prime objective of all employees whether they perform ground and on board activities: Grimaldi Lines employees, remote offices, and agents, maritime employees, outsourced employees, etc.

# 2. ORGANISATION

Ground organisation

See the Grimaldi Group's Quality/Environment Manual

On board organisation

The on board organisation of the vessels includes all Grimaldi Group's merchant ship figures as well as the following:

- Purser, Superior Officer responsible for all hospitality aspects, including embarking and disembarking of passengers. He/she is responsible for ensuring that the procedures, quality standards, and staff conduct are maintained and implemented in agreement with the directives established by the Company. He/she responds to the Master for general discipline, safety and environmental policy of the hospitality sector.
- Quality Committee, which has the same set up (plus the Purser) and functions provided for on other Grimaldi Group merchant vessels.
- Recruitment and training of hospitality and passenger assistance staff, which takes place with the same criteria as defined for the ground organisation in the Grimaldi Group's Quality/Environment Manual, bearing in mind the particularities of the service assigned. In particular, diplomas obtained in specialist schools, experience on other ferry or cruise liner vessels or in hotels, as well as the knowledge of foreign languages are top priorities.

3.	BRANDING
3.1.	Master Brand
0.3.	Our brand is Grimaldi Lines
3.2.	Brand Vision
	Grimaldi Lines wants to be the "leading" ro/pax brand. This entails offering a mixed
	cargo/passenger type vessel service with high-quality standards.
3.2.1.	All on board, port, and ground personnel involved must share our brand vision and will act
	according to the image we want to convey at all times.
	The manager will be responsible for ensuring that all employees are aware and adopt the Grimaldi
	Lines vision.
4.	PASSAGE CONTRACT
4.1.	Passage Planning
	The Short Sea Line manager plans the passage.
4.2.	Fares for Passengers and accompanied vehicles
	The Passenger Sector Managers process the fares, and then Management approves them.
4.3.	Advertising, sales promotion, offer
	The Sector Management provides for advertising through specialised agencies.
	The Passenger Service Management promotes the sales and operates:
	- In Italy, through corporate sales promotion departments and travel agencies;
	- Abroad, through Grimaldi offices or general sales agents (GSA).
	The offer is formulated in detail with the aid of brochures or the website including: routes and
	departure dates, fares and prices, terms and conditions of service and services offered on board.
	The fares applied to some sea lines are mobile, meaning they may vary depending on the
	occupation of the vessel capacity.
4.4.	Contract review
	Contract review means the Company's checking of availability of the spot requested concerning a
	specific departure date. This check corresponds to the "booking" managed by the Booking Office.
	The booking request may come:
	Directly from the Client
	From the Travel Agency  Travel agency
	From the Tour Operator (Travel organiser)  From the Position Agent (G.S.A.)
	• From the Peripheral or Foreign branch or General Sales Agent (G.S.A.)
	<ul> <li>At the Corporate sales points</li> <li>From a telephone call, fax, correspondence, E-mail or the Internet (Business</li> </ul>
	to Consumer and Business to Business).
	Since the Booking Office, the branch office and travel agency partners have direct access to the
	reservation system, they check and confirm the price and availability together with the Client. By
	way of acceptance, the client must pay the full ticket price based on the published General
	Conditions. If the offer is accepted, the next step is the contract phase.
	Travel contract
4.5.	The issuing of the passage ticket represents the travel contract. The travel contract is governed by
	the Navigation Code, by Decree Law 206/2005 dated 06/09/2005, EU Regulation 1177/2010 dated
	24/11/2010 and the General Conditions, the full text of which is available at all Grimaldi Lines
	offices and on www.grimaldi-lines.com. With Decree Law 206/2005, Italy transposed European
	Directive 314/90 on travel, holidays and "all inclusive" circuits. The client is given a carriage pass
	(ticket) representing the carriage contract in agreement with the Navigation Act.
	By buying the ticket, the passenger enters into a contract highlighting and confirming the services
	booked and the price details.
	For each departure, the Booking Office sends a Passenger List to the vessel, the Agent or office in
	charge of embarking operations. At scheduled times, the automated embarkation system will
	automatically send the embarkation list to the vessel, the Agent or the Office in charge of
	embarking operations.
5	PROCUREMENT
3	The general provisions provided in the Grimaldi Group's Quality/Environment Manual apply for the
	supply of products, consumer goods, contracted services, etc. as well as for the assessment of
	suppliers.
5.1.	Consumer goods (meals, bar, etc.)
5.1.	This procurement is entrusted to a leading company operating in the sector, selected by tender
	based on strict reliability and guarantee of service and product quality criteria as well as economic
	criteria.
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	IDENTIFYING THE REQUIREMENTS OF THE SERVICES PROVIDED
6	The Company has adopted a series of measures serving to identify the Clients who make use of
	the various services offered. In fact, a Passenger List with a plan showing the occupancy of cabins
	and seats is drawn up; this helps control access on board only to authorised people.
7.	WORK INSTRUCTIONS FOR SALES OFFICES
7.1.	Definition
, . <u> </u>	Commercial Offices means the structures (corporate offices, ticket offices, general agents and
	partner agencies) undertaking activities connected with serving passengers.
7.2.	Sales Promotion - Marketing
,	As described in section 4.3.
7.3.	Booking and sale of tickets
	The offices referred to in section 7.1 have direct access to the Grimaldi Lines' electronic booking
	system and the booking systems for the Ancona and Venice to Igoumenitsa and Patras lines.
7.4.	Claims
	Claims are first managed by the Customer Satisfaction Office and then by the Claim Office if the
	claim comes from a Legal Firm.
	All claims received are entered into a specific register.
	All claims received in writing will be responded to in writing in the shortest time possible.
7.5.	Documents
	Passengers have to be in possession of valid documents. Passengers are responsible for checking
	the validity of these documents.
8	SPECIAL TERMS AND REDUCTIONS
8.1.	Definition
	Our principle is that every passenger must occupy the cabin (or spot) that was paid.
	General rule
8.2	Fare reductions and upgrading can be applied to:
	✓ Shipping company concession
	✓ Snipping company concession ✓ Grimaldi group commercial reasons
	✓ Grimaldi group employees
8.2.1.	Shipping company concession
0.2.1.	The provisions of the shipping company are applied.
	For the application, the operator must have the certainty that the authorisation has been granted.
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### 9.5. Passenger embarkation with bikes

Passengers traveling withouth a vehicle but with a bike should get the terminal through the lanes reserved to passengers withouth vehicles.

Within the terminal passengers may move their bikes only manually and not be sitted on them. Once next to the ramp, bike passengers will be redirected by ship crew to park their bikes in the dedicated area which is the parking area of motos.

During the whole sea passage the bikes must remain in the garage and in no case can be moved inside cabins or in passenger areas.

# 10 PASSENGERS WITH REDUCED MOBILITY

Disabled person' or 'person with reduced mobility' (here indicated as PRMs) means any person whose mobility when using transport is reduced as a result of any physical disability (sensory or locomotor, permanent or temporary), intellectual disability or impairment, or any other cause of disability, or as a result of age, and whose situation needs appropriate attention and adaptation to his particular needs of the service made available to all passengers. The same conditions applied for all the other passengers, when it comes to bookings and tickets, are valid for them too. The carrier and terminal operators will make every reasonable effort to ensure that assistance is provided in such a way that the PRM can embark, disembark and travel on the ship. However, if it is absolutely impossible to board for justified safety reasons and/or where the design of the passenger ship or the port infrastructure and equipment, including the port terminals, makes it impossible to embark, disembark or transport the person in question in safe or concretely feasible conditions, the PRM may be refused booking, the issuance of a ticket and/or denied boarding.In case their embarkation is denied, they can choose between refund and an alternative transport solution. When PRMs book or buy a ticket or at least 48 hours before the departure, they should report in writing their specific needs for the accommodation, the seat, the services required or the need to bring medical equipment. The request for assistance must be sent to the Company by email to info@grimaldi.napoli.it or by fax at +39 081 5517716. For any other assistance, they have to inform the company at least 48h before departure. Once arrived at the port, the PMR can go to the dedicated Grimaldi Lines PRM ASSISTANCE desk or reach directly the boarding yard by car with the hazard lights turned on, waiting for an attendant to provide the type of assistance he needs and indicate where to park the car on the garage deck, to reach more comfortably the elevators, providing the onboard wheelchair, if necessary. Where strictly necessary, in accordance with article 8 of the Regulation (EU) No. 1177/2010 of 24 November 2010, carriers, travel agents and tour operators may require that a disabled person or person with reduced mobility be accompanied by another person who is capable of providing the assistance required by the disabled person or person with reduced mobility. As regards passenger services, such an accompanying person shall be carried free of charge. In compliance with the applicable legislation and in particular pursuant to European Regulation no. 1177/2010 and of the European Regulation no. 392/2009, the Company ensures compensation for damage deriving from the loss or damage of mobility equipment or other specific equipment, used by people with disabilities or Persons with Reduced Mobility (PRM), if the harmful event is attributable to fault or negligence of the Carrier. In order to be able to request compensation for damages, passengers can send a written request to the Company via email at customer@grimaldi.napoli.it or by registered mail, fax and certified email, possibly using the "specific complaint form on the Company's institutional website. In case of need, the Company will make every effort to quickly provide adequate temporary replacement of the equipment. The Hotel Manager or any other appointed person ensures the assistance to PRMs. Once the Hotel Manager has been informed that a PRM is expected on board, an adequate assistance will be arranged: from the embarkation to the disembarkation. The Hotel Manager will highlight the cabins reserved to the PRMs on the ship layout diagram and will give a copy of it to the Captain. The crew personnel in charge of PRMs assistance must wear a white/blue band on the arm with ASSISTANCE written on it, in order to be easily recognized. The ticket office ashore must provide the PRMs vehicle with a sticker, which can guarantee parking priority in the dedicated areas. When boarding, such vehicles must be addressed as a priority towards the parking areas on board intended for them. The above areas allow full mobility of the PRMs and the easy access to passengers' areas. Before the arrival, the Hotel Manager must inform the destination port agent about all the PRMs needs for disembarkation and assistance ashore. In case of emergency, the person indicated for the purpose will help the PRMs to reach the meeting place and the embarkation areas. Ship decks can be easily reached by elevators provided with luminous keyboard, appropriate audio and keys for blind or partially-sighted passengers. On board there are equipped cabins available for RMPs, in accordance with the current law. In the public areas, tactile guides highlight the paths that lead to the main on-board services. There are also restrooms dedicated and equipped for PRMs. Aboard the ships there are parking spaces reserved for PRMs, highlighted by identification plates and equipped with facilities for fixing wheelchairs.

To make the document containing a Summary of the provisions concerning the Rights of

To make the document containing a Summary of the provisions concerning the Rights of Passengers travelling by sea and inland waterway easily accessible to the PRM, a paper copy of the same is left in the cabin for them; if the PRM is blind or visually impaired, an audio recording containing the same content and a device on which this is recorded will be available at the reception of the ship. The methods for sending complaints are also clarified in the Summary document mentioned above. The preceding is easily accessible through the direct link of the home page of the website www.grimaldi-lines.com.

### 11. UNDER AGED PASSENGERS

- **11.1.** Under aged passengers must have a valid individual identification document according to the provisions of EC Regulation 2252/2004.
- Passengers under the age of 14 with Italian nationality, travelling on international routes with a companion other than one of the parents, must have with them the statement of accompaniment, issued by the police.

For details on the procedure you can contact the reference quest, or see the following link https://www.poliziadistato.it/articolo/191.

- Passengers between the ages of 14 and 17 may be admitted on board as long as they hand over to the Ship Commander/Commissioner a release letter signed by both parents, with attached documents, in which they claim to take full responsibility for any harm to the person and/or procured to third parties. Under no circumstances will the Ship Commander and/or other crew member take custody, nor the consequent responsibility, of the child on board the ship. It is understood that the passenger will have the burden of carrying all the necessary documentation required by the destination country; The carrier will not be liable if such documentation is deemed insufficient by the authorities in the destination port.
- **11.4.** For minors who do not have Italian citizenship, it is appropriate to refer to what is established by the competent authority of the country of origin.

### 12. PREGNANT PASSENGERS

- 12.1. Women 6-months pregnant or more can only travel with a medical certificate authorising the trip, and that has been issued no more than 7 days before the date of departure. However, in case of a pregnancy with complications, the pregnant passenger will be provided with a medical certificate authorising the trip regardless of the number of months of pregnancy. In any case, embarkation will not be permitted to women who are expected to give birth 7 days after the departure or who have given birth 7 days prior to the departure.
- The Master of the Vessel has the right to refuse passage of a pregnant woman who has, at his/her sole discretion, a medical condition that does not enable her to make the journey. If the Master refuses to board the passenger for a justified reason, the Carrier will be liable exclusively to reimburse the cost of the passenger ticket.

# 13. CARRIAGE OF PASSENGERS AND ACCOMPANIED PETS

# 13.1. General rule

Pets are considered all animals that can be regularly held according to the legislation in force in the country of origin. The transport of animals other than Pets is to be excluded as "accompanying" and must be treated as an "ad-hoc" agreement.

# Fare

**13.2.** The fare is that shown online at the website www.grimaldi-lines.com.

# 13.3. Dedicated accommodations and permanence on board rules

Rooms are dedicated for the stay of dogs and cats; other animals (rabbits, birds, hamsters, etc.) must travel in the carriers owned by the passenger. Animals are not allowed in the cabins, seat room, and public areas; they are allowed on the outside decks of the vessel, where they can walk with their owners.

# 13.4. Meals and cleaning

The passenger must provide meals for the animal. On board employees are not required to give food to the animals, except for water. Access to the kennel is only authorised during the times established by the ship's Command. The passenger must personally take care of the animal and is obliged to remove droppings, or other, created by the animal.

### 13.5. Responsibilities

The passenger is responsible for accompanied pets. Damage to the vessel, people or property must be compensated on the spot.

The passenger is responsible for vaccinations and other procedures required for travelling or to

# disembarking at the port of destination. 13.6. **Booking** Pets must be booked, either online on the Company's website, through the Call Centre or the branch offices with direct access to the Computerised Booking System, subject to the ship's availability. Ticket 13.7. The animal is to be included in the ticket. 13.8. **Embarking and control** The following is mandatory when travelling with pets (dogs): - European Passport (PET) and a muzzle for international and non-Schengen routes - Enrolment in the canine registry (registered microchip), a bill of health issued by a veterinarian and a muzzle for domestic routes The port agent must proceed as follows if a passenger presents itself at the ticket check with an accompanying animal not printed on the ticket: ✓ Check the availability of the kennel with the Crew ✓ Collect the fee and issue a ticket 13.9. On board The Master must enforce the rules for the transport of animals. The presence of animals in a cabin (only in pet cabin) and passenger areas will not be tolerated in any case, without any exception. If a passenger is found with an animal aboard and if this animal is not printed on the ticket, the vessel must proceed as indicated in section 13.1 In no case can animals travel inside passenger vehicles. 13.10 **Guide dogs** Blind passengers can travel accompanied by their guide dog at no extra charge according to the provisions of law 376 dated 25 August 1988. The animal can travel in the cabin together with the passenger. The presence of the guide dog must be signalled when embarking. 13.11. **Final remarks** The limitations and restrictions for the transport of animals are required for the benefit of all passengers.

#### 14. **PASSENGER REGISTRATION**

Checking passengers during embarkation / Counting passengers during intermediate stops

In accordance to the Decree 38 of 11 May 2020 (transposition of Directive 98/41 / EC 2017/2109 / EU) which from the entry into force and, until the issuance of a specific provision by the flag Administration, defines that the Companies may continue to communicate information relating to the persons on board to the Company's passenger registration officer or to the Company's ground system having the same function, without the obligation of prior approval of the registration system by the competent transport ministry through the General command of the Port Authority Corps provided that the Company implements a passenger registration procedure in order to:

- Ensure that the number of persons on board does not exceed the maximum allowed by the safety certificate for each unit;
- Collect information on all persons on board to facilitate search and rescue operations and cope with SAR events;
- Always be aware of the number of people (passengers, crew, guests, technicians, etc.) present on board.

The booking, e-booking and ForthCRS booking system (for lines from Ancona and Venice) are set so that more tickets than the set limit are not issued. This limit is set to ensure the number of people on board does not exceed the maximum allowed by the security certificate of each unit (infants up to 1 year of age are not counted). The maximum number of crew with a full workforce is always established for the purpose of booking.

In compliance with the decree, when requested by the passenger, the E-booking System collects a contact number during the booking to be used in case of emergency.

Also, to have knowledge of the number of people (passengers, crew, guests, technicians, etc.) on board at any time, the Master is responsible for counting people embarking at each point of call, through shipboard personnel, coordinated by the Purser. With the use of a bar code reader, the shipboard personnel read the pax embarkation pass after checking correspondence of the ticket with an identification document. The data loaded into the "person counter" is downloaded to the system by the Purser to enable the automatic processing of the final embarkation list to be sent to the competent authorities in the time and manner established.

# Passenger checks during embarkation

Access on board is only permitted to passengers with a regular travel ticket/embarkation pass and only through the embarkation/disembarkation points indicated on board.

Tickets are checked during the embarkation of passengers as follows:

- a. The Purser or one or more of its delegates will check the tickets during embarkation of passengers on foot and with accompanied vehicles;
- b. Embarkation of all passengers on foot will take place through a single correctly identified pedestrian access (PASSENGERS EMBARKATION POINT);
- c. Before allowing access on board, the personnel referred to in point a) will provide for the following for each passenger:
  - i. Checking of possession of a valid ticket;
  - ii. Checking of possession of an identification document;
  - iii. Checking of correspondence between the passenger's name on the document and on the ticket;
  - iv. Registration of the passenger's embarkation (using optical scanners or by manual check for vessels not equipped with optical scanners).

Please note that, in agreement with the provisions of regulations in force and as already provided for by procedure 4 attached to the SMS, the Purser sends the complete list of passengers to the PASSENGER REGISTRATION SYSTEM MANAGER within 15 minutes before departure.

Embarkation and disembarkation of vehicles are allowed only with the driver on board unless the competent authorities establish specific exceptions.

The total number of people on board must be reported:

- To the Master before departure of the vessels
- To the Person in charge (or Officer) recording the information
- To the designated authorities during departure and through the Master

The Person in charge of recording the passengers is Francesca Marino.

The registration of passengers for all lines is done with the automated E-booking system, except for the Ancona-Venice-Igoumenitsa-Patras lines, for which the ForthCRS is used.

The data collection system can either be automated (A) or manual (B) depending on the installations on board and in the ticket offices.

A) Vessels with automated data registration system

During booking, the E-booking and ForthCRS systems collect the necessary data envisaged by the Decree: name, surname, gender, nationality, date of birth and information about any special treatments or assistance required by the passenger during emergency situations, when volunteered by the passenger, a contact number in case of an emergency. Moreover, the request for "special assistance in case of emergencies" is transcribed on the booking file and automatically reported on the passenger list when passengers explicitly request this assistance.

The passenger list is sent to our port agents and the Purser:

E-booking system: The e-booking system interfaces with the computerized DMGPAX system, available in the port ticket offices and on board vessels. This system is used to issue boarding passes and to check the lists and any on-board services (for example, meal packages) associated with passengers.

ForthCRS system (Ancona - Venice - Igoumenitsa - Patras route): the ForthCRS system, connected with its check-in module, issues a ticket on thermal paper to be converted possibly on board into a cabin key if the ticket includes the booking of this accommodation.

During embarkation, the Purser checks and corrects any incorrect information and completes the passenger list.

Upon departure, the vessel must have a passenger list complete with all the information required

by Decree.

Having received the passenger list and when embarkation is closed, the Purser, or a delegated person, downloads the "person counter" data into the DMGPAX system or in the check-in module of the ForthCRS system to obtain a final list of the actual passengers on board, highlighting the no-shows. This list must be sent to the Authorities 15 minutes before the vessel's scheduled departure time. The 15-minute limit also applies for night departures and departures on bank holidays.

The Purser sends the final passenger list, and the list of crew boarded (also complete with the necessary data) by e-mail to:

- The registration officer
- Passenger Office in Naples that will update the passenger data as quickly as possible and as a priority.
- Competent authorities (upon request)

In the case of malfunction of the e-booking, ForthCRS system or DMGPAX system, there is a back up of the information, which is then recorded and stored anyway.

The method for using the ticket issuance computer system is shared with all people responsible for its use.

The e-booking and ForthCRS registration systems (software) meet all the functional criteria provided of Decree: readability, availability, functionality, and security. The same requisites are satisfied when the manual system is used.

The application of Decree is mentioned in the General Conditions attached to the ticket and are published on the website www.grimaldi-lines.com, these also include compliance required by GDPR 2016/679.

B) Vessels with manual data registration system

The vessel receives the advance embarkation list from the port's ticket office. The crew updates this list.

Within 15 minutes from the departure of the vessel, the Purser must send the complete and updated list of passengers on board to the Passenger Office in Naples via e-mail or fax. The 15-minute limit also applies for night departures and departures on bank holidays. The booking office will update the passenger data as quickly as possible and as a priority.

# Counting passengers during intermediate stops

The on board Purser under the supervision of the Vessel Master will implement the following procedure during the disembarkation of passengers at intermediate stops:

- a. Before arriving at the port, the Purser will designate two crew members, one to count their passengers disembarking on foot and one to count those disembarking with an accompanied vehicle;
- b. During disembarkation of the passengers, the two designated crewmembers will count the disembarking passengers with the supplied people counter. Moreover, they will collect the boarding passes. Passengers without boarding passes will be conducted to reception to be identified.
- c. When disembarkation is completed, these crew members will record the numbers detected on the FM/USQA/VR/VR/118 form (annexed to the above-mentioned ministerial memorandum) and will sign the bottom of the form;
- d. The Purser will then verify the numbers detected during disembarkation for congruity with those on the passenger lists and will tick off the names of passengers who disembarked using the boarding passes. According to the privacy law, the boarding passes must be destroyed.
- e. This form will be stored in the BOX SMS 063 (Attached label) in the Purser Office, which is proof that this procedure has been implemented.

If the Purser is not on board the vessel, the Vessel Master will be responsible for applying this process.

### 15. DRIVERS

Driver means any driver of a commercial vehicle loaded onto the vessel. There may be more than one driver for each vehicle. The price of passage is fixed by the UCOM and must be included in the bill of lading, along with the name and surname of the driver.

The latter must have the identity documents required for the journey and to disembark in the destination country.

The drivers are treated as passengers for the purposes of SOLAS and Decree 13/10/1999.

15.1.	Embarkation card
	Each driver will receive a regular embarkation card during check in.
15.2.	On board arrangement
	Drivers will be assigned a cabin, vessel's availability permitting.
15.3.	On board meals
	Drivers have the right to free meals. See section 17.12.
L	
16.	WORK INSTRUCTIONS FOR PORT AGENTS
16.1.	General
	The port agent deals with embarkation and disembarkation, passenger and vehicle pre-
	embarkation assistance and checks (check in), the sale of tickets at the port, and contact with
	port, customs, and immigration authorities.

# 16.2. Welcoming - Embarkation

The port agent is responsible for welcoming passengers ashore. The port agent must:

- Make sure there are adequate signs within the port to direct the client to our terminal/embarkation area/check-in point;
- Install the display board indicating the embarkation time, if available, and always keep this updated;
- Provide passengers with all the information required.

The port agent is responsible for ensuring adequate welcoming based on the structures available. Passengers waiting for embarkation must have toilettes and refreshment options available near or at a reasonable distance from the waiting area. Passengers without a vehicle must have a covered area with the possibility to sit made available.

The embarkation of passengers starts when the Purser gives approval. This authorisation cannot be granted before the vessel is ready to welcome the passengers.

The embarkation time must be agreed to between the port agent, Purser, and boarding office, which must also take into account that:

- · Keeping passengers waiting too long on the ground must be avoided;
- Passengers must be embarked so that meals can be served at regular hours.

The passenger-driver must embark the vehicles based on instructions received from the deck officer.

During the embarkation of passengers without vehicles, any movement of vehicles to and from the vessel must be stopped.

Passengers cannot embark without a valid ticket for the departure in question.

The port ticket offices all have computers connected to the central system.

# 16.2.1 Passengers already with tickets

### Fast check-in procedure

In the ports where the fast check-in procedure is available, the passenger must not go to the ticket office and the terminal personnel will direct this passenger to an area near the vessel's mooring quav.

When check-in procedures start, the ticket office personnel, together with the on-board personnel (purser staff), will check in the passengers by checking the barcode or QR code found on the travel document (ticket, voucher or boarding pass) using a handheld device, equipped with a scanner. The personnel responsible for check in will control the following:

- i. Possession of a valid travel document;
- ii. Possession of a valid identity document;
- iii. Correspondence of the passenger's name on the identity document and travel document;
- iv. Correspondence of the accompanied vehicle on the document and travel document. In the case of doubts on the rate/category applied to the vehicle, the vehicle will be measured if necessary and the passenger will be asked to pay the fare difference.

The software of the held hand device checks if the passengers are regularly added to the vessel's passenger list and, if this check is positive, two stickers will be printed and handed over to the passengers; one sticker will contain personal details of the passenger and the other will contain the vehicle information.

If the printer connected to the hand held device does not work, passengers will be given the company's pre-printed stickers attesting to the completion of check-in procedures. If the passenger also booked a cabin, once embarked, he/she must go to the automatic kiosks found on board to print the cabin keys. These kiosks scan the bar code present on the travel document and automatically print the cabin key. The kiosks are only activated while the vessel is berthing; they are deactivated and moved once the vessel has departed.

# Traditional check-in procedure

For lines using the traditional procedure, the passenger must go to the Grimaldi Lines desk at the port to check in and receive the boarding card.

In any case, the following procedure must be followed:

During the embarkation of passengers, the travel tickets will be checked as follows:

- The Purser or a delegate will check the travel tickets during embarkation of passengers on foot and with an accompanied car; in the case of doubts on the rate/category applied to the vehicle, the vehicle will be measured if necessary and the passenger will be asked to pay the fare difference. For accompanied vehicles, the personnel will give the passenger the "embarkation" sticker to be placed on the windshield.
  - a. All passengers on foot will be embarked through a single properly identified pedestrian access (PASSENGERS EMBARKATION POINT);
  - b. Before authorising access on board, the personnel mentioned above will check the following for each passenger:
    - v. Possession of a valid travel document;
    - vi. Possession of a valid identity document;
  - vii. Correspondence of the passenger's name on the identity document and travel document;
  - viii. Recording of the passenger's embarkation (using optical scanners or manual checking off for vessels not equipped with optical scanners).

### Travel documents:

All passengers, including children and infants, must be in possession of the identity document valid at the time of check-in at the port (identity card, passport). In this regard, boarding with the mere self-certification pursuant to Presidential Decree 445/2000 will in no case be allowed. Otherwise, boarding will be refused, without the right to a ticket refund.

The travel documents are:

In the case of travel on the national territory, an identity card or one of the identification documents deemed equivalent by article 35, paragraph 2, of the Decree of the President of the Republic no. 445 of December 28, 2000.

In the case of travel to Schengen States, passengers must always be in possession of a recognized document valid for crossing borders:

- an identity card valid for expatriation
- the passport

In the case of travel to non-Schengen foreign countries, valid documents are considered:

- the passport

refer travel documentation, please details regarding to https://www.poliziadistato.it/icle/24725 or, in the case of passengers without Italian citizenship, it is appropriate to consult the competent Authority of the country of origin. Before embarking, passengers must ensure that he has all the necessary documentation to

disembark in the port of destination; in no case the Carrier will be liable for any refusal to disembark by the local authorities, in the event of insufficient documentation necessary for entry into the country of destination.

#### 16.2.2 Passengers arriving at port without tickets

Tickets are purchased from the port agent.

Proceed as described in section 16.4.

#### 16.2.3 Passenger list

The passenger list is drafted with the DMGPAX or ForthCRS computer system. The on-board crew and port agents are equipped with an explanatory manual to use the system. Moreover, ground staff is responsible for providing employees with customised training.

Some operational details are given below:

The port agent prints the list directly from his/her computer.

Passenger list for the Border Patrol

For the lines to and from countries outside of the Schengen Area

• The Purser provides the Border Patrol with the list. There may be local arrangements requiring that the Port Agent directly send the list.

For lines between Schengen Area countries:

A correct application of the Schengen Agreement does not require any lists since border controls are abolished.

# 16.2.4 SAR data Departure Message

Within 15 minutes from the departure from the port, the Vessel Master will send a message to the DPA, COMMERCIAL DEPARTMENT (Line Manager) and the PERSON RESPONSIBLE FOR THE PASSENGER REGISTRATION SYSTEM containing the following information:

- a. Vessel Name
- b. The total number of passengers on board, divided as follows:
  - i. Number of crew members/staff;
  - ii. Number of passengers older than 12 years of age (adults);
  - iii. Number of passengers aged between 3 and 12 years of age (Children);
  - iv. Number of passengers aged less than 3 years (Babies).
- c. Total cargo on board, divided as follows:
  - i. Number of heavy vehicles (Trailers / Guided) and relative total weight for each deck;
  - ii. Number of cars and relative total weight for each deck;
- d. Hazardous cargo on board, weight, and position (Bridge, ordinate)

# 16.3 Delay of the vessel

In case of delay of more than 90 minutes on the scheduled departure time, the Carrier applies the procedure of the European Rule n 1177/2010. In case of delay of 60 minutes on the scheduled departure time the Carrier, even if not obliged, will inform passengers through sms and e-mail

### 16.4. Ticket sales

The port agent must sell tickets to passengers who do not have tickets.

The agent with direct access to the electronic booking system proceeds as prescribed in the relevant operating instruction.

The port agent issues the Grimaldi Lines ticket by applying the company's official fares.

Refer to UTUR 05 to proceed with the emergency check-in of passengers at the ticket office.

16.5. Ticket sales to non-EU immigrant passengers

All the necessary precautions must be taken before selling a ticket to a non-EU immigrant, in particular, verify that the identity documents are in compliance with the requirements for the crossing. See section 16.2.1 for details.

These precautions are necessary since the shipper is responsible for the embarkation of passengers without documents valid for the crossing.

The Company must refuse passage to passengers who do not have valid documents (even if they have a ticket).

# 16.6. Drivers - Technicians - Family members

The port agent/ticket office provides drivers with a regular boarding pass. See section 15.1. The port agent is responsible for the checking the drivers' identity documents. An identity card valid for foreign travel is also required for Schengen area countries.

### Technicians:

Regular service tickets are issued to technicians or Company personnel who must be boarded so that they are considered passengers in all respects.

The port agent/ticket office provides drivers with a regular boarding pass. See section 15.1.

# Family members:

A regular passenger ticket with any discounts, if provided for by the Company, is issued for family members.

The port agent/ticket office provides drivers with a regular boarding pass. See section 15.1.

# 16.7. Safety

For safety reasons, access on board must be strictly limited to travellers (or staff, suppliers, service providers).

Accompanying persons are not allowed and must say goodbye to travellers before the latter board a vessel. Visitors are not allowed on board unless authorized by the Company (which must inform the Master).

The port agent and the deck officer must enforce these rules without exceptions.

# 16.8. Embarkation/Disembarkation

The port agent liaises with immigration and customs authorities to embark/disembark passengers and vehicles as quickly as possible.

According to the Schengen treaty, border controls for traffic among Schengen area countries have been abolished.

### 16.9. Claims

Any passenger who wishes to issue a claim against the Company accordingly to UE Regulation 1177/2010, may transmit it within 2 months from the date when the service has been, or should have been, provided. Within 1 month from receiving the claim, the Carrier must notify the passenger if the claim was accepted, refused or still under evaluation. The time required to definitively reply the claim may not exceed 2 months from the date when the claim was received. Claims may be sent in italian and/or english language:

via e-mail address: customer@grimaldi.napoli.it

via certified e-mail: grimaldieuromed@legalmail.it

via ordinary mail/registered mail: Grimaldi Euromed Spa, via Marchese Campidisola 13, 80133 Napoli.

The claimant may use the form available at the claim page of the website www.grimaldi-lines.com or sending a communication containing at least:

- a) Details of the user (name, surname, address) attaching copy of the identity card as well as , if any, details of a representative attaching relevant delegation;
- b) Details of the journey (date, time and place of departure, destination) and of the reservation number or ticket number;
- c) Description of the discrepancy between the service and the requirements described in the european or national law and with the general transport conditions.

In case of missed reply to the claim within the required time, if the claim has been submitted in a complete form and accordingly to above conditions, or if the reply has been considered unsatisfactory, the passenger can:

- 1. apply the out-of-court dispute resolution procedure by initiating a conciliation procedure in the Chamber of Commerce of the place of passenger residence;
- 2. submit a second instance complaint to the competent national Authority, in accordance with its own regulations (Autorità di Regolazione dei Trasporti https://www.autoritatrasporti.it/passengers-rights-trasporto-via-mare-e-per-vie-navigabili-interne/?lang=en).

In case of delay by the Carrier in replying the claim, the passanger will be entitled to get an automatic refund as established by the measure n.5 of the Resolution of the Transport Regulation Authority n. 83/2019 available at following link: https://www.autorita-trasporti.it/wp-content/uploads/2019/07/All.-A-delibera-n.-83\_2019.pdf

# 16.10. Extraordinary or unplanned events

These are regularly managed in compliance with the Safety Management System (SMS).

### 17. WORK INSTRUCTIONS FOR THE VESSELS

### 17.1. General conduct

Passenger Service personnel must wear the company uniform when on duty or in the passenger area.

Employees must always pay special attention to personal care, and hygiene and their uniform must be in good conditions.

Relations with clients must be based on the utmost courtesy and helpfulness.

Employees are not allowed to drink alcohol or smoke on duty or in the passenger areas and use or possess drugs.

The entire crew must wear a badge with their name and picture.

### 17.1.1. Uniforms

Concerning uniforms for:

- OFFICIALS
- NON-COMMISSIONED AND COMMON DECK AND ENGINE OFFICERS
- NON-COMMISSIONED AND COMMON KITCHEN OFFICERS
- ROOM STAFF

See the provisions issued by the Maritime Office.

# 17.2. Welcoming - Embarkation

The Purser is responsible for welcoming passengers aboard the vessel.

Embarkation time is agreed to with the port agent (see section §16.2.)

The sending of an "embarkation coupon" accompanies the boarding pass issuing procedure with the introduction of the fast check-in system.

#### FAST CHECK-IN

- The passenger goes directly to the embarkation area.
- Assigned staff checks the correspondence between the passenger's ticket and document
- The passenger goes on board where he/she will be given the cabin access key if provided.

### TRADITIONAL CHECK-IN

- The passenger goes to the Ticket Office desk to check in.
- The ticket office checks the correspondence between the passenger's document and ticket and issues a boarding pass.
- The passenger goes on board after a second check in at the vessel entrance, carried out by the Purser or a delegate

Passengers wishing to upgrade their cabins must proceed as per section 17.3.

# 17.3. Upgrading cabins on board

It must be ruled out that we can upgrade on board cabins free of charge. This Regulation is used to clarify and define our policy on this matter.

All cabin types offered are described in detail in our brochures and on our website through the use of photographs.

# 17.3.1. Upgrading against payment

Upgrading is allowed subject to availability and payment of the fare difference.

The on-board crew collects the fare using the same procedures as the ticket sales.

### **17.3.2.** Upgrading without paying the difference

Only the Purser can decide if this upgrading is possible, and only in the following cases:

- ✓ The actual and objective need to accommodate the client in a different cabin that that booked, and inability to provide a cabin of the same category.
- ✓ Authorisation from the shipping companies
- ✓ Authorisation from the Passenger Office

The Passenger Office in Naples must send the "upgrading" requests in writing to the vessel.

### 17.4. Disembarkation operations

The disembarkation of passengers, with or without a vehicle, must be prioritised.

When the disembarkation operations are completed, the Purser is responsible for checking that no passengers (except for in-transit passengers) have remained on board.

When the disembarkation operations are completed, the deck officer is responsible for checking that no passengers (except for in-transit passengers) have remained on board.

### 17.5. Passengers in transit

- Passengers in transit must remain on board during vessel stops at intermediate ports. Only in exceptional cases, the Purser, who will assess the actual need/urgency/emergency, must be asked for special authorisation to disembark. The accompanied vehicles of the passengers cannot be disembarked at transit ports.
- Authorised passengers must have regular identification papers and must bring them together with the boarding card. The names of these passengers must be previously notified to the Master and the police to enable controls when returning on board.
- The disembarkation and embarkation time of in-transit passengers exceptionally authorised to go ashore will be determined by the Purser, taking into account vessel operations.
- The port agent, border police office, and the passenger office must be promptly informed if a passenger does not come on board before the vessel's departure; in this case, the cabin, if provided, and/or accompanied vehicle must be checked before departure and the possible disembarkation of the accompanied vehicle must be decided on, if feasible, together with the agents/authorities.
- The Purser will provide the Master with a list of in-transit passengers for passengers on round trips/mini cruises/hotel on board. This list will be provided before each stop, and a copy will be available at the ramp. The guard crew at the ramp is responsible for ticking off all entrances/exits of those passengers and carry out the security checks at each re-boarding.
- To board the vessel, each passenger must have a valid document and boarding pass.

### 17.6. On board access check

The on board access check is a crucial prevention measure for the safety of the vessel and passengers.

The embarking passengers must be checked as provided for in sections 16.2 and 17.2. Once embarked, the passenger cannot go back down to the ground. In-transit passengers must be checked as provided for in section 17.5. Visitors are not allowed on board without the Master's explicit authorisation. The Company's ground crew, agents, and suppliers can climb aboard only after due identification and will be recorded in a specific register and be provided with a numbered 'visitor' badge. All visitors, including Grimaldi Group employees, must present an identification document. The port agents and terminal operators shall inform the Master on how to identify their employees or delegates, who climb aboard for official reasons. Smoking on board 17.7. Italian laws on this matter are applied. The entire crew must work together to enforce the legal provisions on the subject. Cabin / Cabin Service/Services and Common Areas 17.8. Refer to specific HTL Work Instructions for Cain checks and equipment, for the operation of the Cabin, Toilets and Common areas. 17.9. Television The Purser (or a delegate) manages the television(s) of the public areas. Passengers cannot change channels During the embarkation of passengers televisions in public areas must be used exclusively for the transmission of security video information. Self-Service and Restaurant Service 17.10. Accurate management of meal times must ensure a timely and efficient food service, even in conditions of full vessel occupancy. Catering services are provided with a "self-service" or 'à la carte' restaurant service. Mealtimes must be posted in a visible manner. Moreover, the start of each mealtime must be announced with the loud speaker. Meal times must take into account the arrival and departure time of the vessel and the number of passengers on board. 17.11. Meals The fundamental principle is to serve our passengers good quality food. The following meals are served: Breakfast, Lunch, and Dinner. Some bars provide snack and fast food service. The Purser shall carry out frequent and thorough inspections of the food supplied aboard. **Meals for drivers** 17.12. Meals are included in the passage of drivers. Pre-paid meals 17.13. Individuals and groups with pre-paid meals will receive their ticket with meals specifications. These specifications are also shown on the boarding pass. The passenger will not be reimbursed if the meals are not consumed or are partially consumed. **Collection checking** 17.14. The catering contractor administers the restaurant, bars, and shops, and collections are within its The Purser is responsible for Grimaldi Lines collections and also has the responsibility to monitor the collections of the contractor from the registers of the Self Service, restaurant, bars and shops. All of the contractor and Grimaldi Lines' transactions with collection must pass through the DMSQL system installed on board, the Minoan Lines SA sales agent operates the system used for the lines from Venice and Ancona. Both touch-screen and standard registers are used in the bars, restaurant, self-service, store, and wellness centre, if present. The Tourism Accounting Office provides the instructions regarding the sending of data to the office in Naples. The Offices in Naples have a person dedicated to the monitoring of on-board sales. On-board sales of the passenger ticket or fare difference 17.15. The Purser carries this out. A Grimaldi Lines passenger ticket, exclusively in Euro, must be issued for each transaction. The sale and collection of the fare must be recorded in the DMSQL system or the on-board system managed by the Minoan Lines SA sales agent (only for lines from Ancona and Venice). Payment by credit card is accepted according to the procedures defined by the finance office and, if authorised, via POS (see section 17.19) Payment by cheque will not be accepted under any circumstances. **Currency exchange** 17.16. There is not a currency exchange service on board **17.17.** Luggage

Only packages containing personal items are allowed as free baggage. Baggage must not include goods destined for sale. Dangerous and hazardous goods are not allowed (the list of dangerous and hazardous goods include, but are not limited to: arms, explosives, and drugs).

The passenger must carry the luggage necessary for the crossing since garage decks are closed during the crossing. Each passenger with cabin accommodation has the right to bring only one suitcase in the cabin. Passengers with accommodation in a chair or crossing deck may only bring one modest-sized carry-on bag.

Baggage in excess of the limits set forth above, unless stored in or on your vehicle, must be deposited in the luggage compartment with the payment of the relevant price. Household goods and fittings must be recorded and placed in the garage for a fee. In any case, the responsibility of the luggage carrier may not exceed the limits imposed by the Navigation Code or any applicable International Agreement, and always within the 30 kg limit per person for unchecked baggage, including that carried inside or on the accompanied vehicle or deposited in the vessel's luggage compartment. The Carrier is not in any way responsible for any theft, loss or damage to jewellery, money, documents, manuscripts, valuables or valuable items (personal and otherwise), wherever they are kept on board.

# 17.18. Payment of collections to the Grimaldi Group

The Purser regularly pays the collections to the Grimaldi Group, by delivering them to the port agent of the principal Italian port.

# 17.19. Credit card payments

See the instructions provided by the Tourism Accounting department for the use of POS devices. Acceptance of credit cards in the restaurant and stores is the contractor's responsibility.

# 17.20. Food Hygiene

Food hygiene means the necessary measures to ensure the safety, quality and wholesomeness of food in all phases that are the responsibility of the board crew from the reception, storage, preservation and handling of food products up to consumption by passengers and crew.

The matter is regulated by national legislation in force.

To provide passengers and crew an unquestionable catering service quality, also from a health perspective, conduct and operational rules were established for the staff involved in the catering and handling of food, both regarding compliance with the best ways to preserve food and the knowledge of basic rules of the operators' personal hygiene. These provisions are defined in detail by the H.A.C.C.P. standards contained in the corresponding manual.

The Purser and Master have the task and responsibility of ensuring that these provisions are strictly respected. The monitoring of the HACCP system and its specialised activities has been entrusted to external consultants by entering into contracts.

# 17.21. Bars

The bars are opened at scheduled times.

The bar price list is in Euro, and only this currency will be accepted.

The bar price list must be shown and fully visible to everyone.

Alcoholic beverages must not be sold to people under the age of 18.

### 17.21.1 | Bars - Crew services and prices

'Crew= price list: applies only to board personnel authorised by the Master. This price list is also applied to Grimaldi personnel identified with the specific 'Grimaldi Group" badge. Food and drink must be paid in cash.

'Ship owner service' (this sale does not include collection): authorised people must sign the sales receipt. In addition to the signature, the sales receipt must include the (legible) name of the signatory, name of the guest or the justification.

Alcoholic beverages must not be sold to crewmembers.

### 17.22. Casino and Slot machines

The Casino and slot machine areas must be closed during stops at a port (officially from the time when the ship enters the territorial waters).

### 17.23. | Sun Deck

The passenger services must deal with the "light" daily cleaning and has to keep this area in order. The deck crew must deal with the "heavy" cleaning.

The sun deck bar primarily has a seasonal opening.

17.24. Front Desk

Has the function of Information Office and Help Desk; This desk is under the responsibility of the Purser This desk is always opened during the crossing and embarkation/disembarkation operations. 17.25. **Store** The store is opened during scheduled times, which must be posted, and it must be closed during stops in ports. The store sells souvenirs and essential items for journeys within the European Union, and "dutyfree" products are also sold on routes that enter ports in countries not belonging to the European Union. Prices are in €uro and payment by cash or credit card is accepted. "Duty-free" products can only be carried and cannot be consumed on board. Consumption on board during crossings entirely within the European Union 17.26. According to ministerial memorandum 67/B dated 05/04/2000 of the Customs Department, goods boarded in Italy and intended for consumption on board by passengers and crew will continue to be exempt from national excise duty, both in the case in which they are offered free to travellers or if they are purchased from retailers located on the vessels. In this case, sales must be limited to the quantities and types of packaging listed below and cannot be made in areas intended for the distribution of the goods to be consumed on board (bar, restaurant, etc.). To take advantage of the exemption from excise duty, all products must be opened before being delivered to the traveller. **Ecology, Cleaning, and Washing** 17.27. Environmental awareness is becoming ever more widespread. Appreciative of this, Grimaldi Lines regulates its activities in respect of the environment and nature. Cleaning, which is under the responsibility of the Purser, must be done with the utmost care. Particular attention must be given to the cleaning of Public Toilets. Also refer to the HACCP provisions. 17.28. Hygiene Refer to the HACCP provisions. Passenger service suggestion forms 17.29. Our aim is to monitor the quality of our passenger service and, where necessary, to improve and adapt our offer to the needs of our customers Suggestion form 17.29.1. A questionnaire to uniformly and concisely gather the opinion of passengers has been created Distributing Suggestion Forms 17.29.2. A "Suggestion Form" must be placed in each cabin booked before the embarkation Collecting Suggestion Forms 17.29.3. Once compiled, passengers can place the Suggestion Forms in the "mail box" located at the front desk. It is a good idea to invite passengers to fill out the form, but it is forbidden to pressure them. Only spontaneously compiled modules have real value. It is evident that you should not influence the passenger in expressing opinions on the vessel and service in any way. 17.29.4. **Delivering Suggestion Forms** The collected Suggestion Forms are sent to the Customer Satisfaction Manager with sufficient regularity. Passengers also have the right to send the Suggestion Form by post. 17.30. **Complaints** Complaints are always carefully evaluated. Unjustified claims are also worthy of attention and investigation. The Customer Satisfaction Manager must keep a register where all claims presented in writing by the clients are transcribed. Ideally, the crew must promptly intervene to deal with and try to solve the complaint. If this is not possible, a neutral attitude must be taken. Do not blame and avoid agreeing with the client, especially if the claim could result in an application for reimbursement or compensation. If the client asks a board crew member to verbalise a fact, he/she must be limited to drafting a "state of facts" so as not to affect the management of any client complaints by the Company's competent offices. Damage suffered or caused from/to passenger vehicles 17.31.

Any damage resulting from a passenger vehicle to the ship and/or a third party must be compensated directly by the passenger responsible or through his/her insurance company. In any case, the Passenger is required to sign a declaration of liability before disembarking from the

	vessel and provide all the details of his/her insurance as well as a copy of the vehicle's ownership certificate and/or registration certificate and insurance certificate and/or insurance sticker. The damage suffered will be charged to those who caused them. The carrier is not liable for damage resulting from force majeure.
	In any case, the carrier (or its insurance company) is only responsible for occurrences that fall within its responsibility.
17.32.	Telephone and Telecommunication Service In principle, passengers cannot use the phone, fax, or e-mail on the crossing bridge. On some vessels, passengers can use their mobile phone through the vessel's satellite roaming (information posted on board)
17.33.	Passenger Safety See the ILCD 151 work instructions for the handling of passenger injuries on all vessels of the fleet.
17.34.	Medical Service See the ILCD 151 work instructions for the handling of passenger injuries on all vessels of the fleet.
17.35.	Drivers See section 15.
17.36.	Legislative Decree 13/10/1999 (European Directive 98/41 Title III SOLAS) See section 14.
17.37.	Pets See section 13.
17.38.	Delay of the vessel See IL UTUR04 (PROCEDURE FOR HANDLING DELAYS) for the handling of vessel delays.
17.39.	Navigation police All people on board are subject to the authority of the vessel's Master.  If a crime against navigational safety is committed, the Commander may arrest the perpetrators of this crime.  Based on the powers attributed to him/her by law, the Master also supervises the observance of the Civil Code on board and, in particular, the provisions relating to public peace.
18.	<b>INSPECTIONS AND CHECKS</b> See the SMS and H.A.C.C.P. manuals for inspections and checks of the services regarding passengers.
19.	CONTROL OF THE SERVICE AND NON-CONFORMING PRODUCTS
19.1.	General information  Nonconformity of the service and products means any failure or qualitative deficiency of a provision or service compared to what is offered to the Client in the Company's brochures or website.  The monitoring of nonconformities is carried out as follows:
19.2.	Planned and systematic inspections and checks They are carried out by the Purser and by the on-board Quality Committee according to criteria and procedures and are planned to ensure comprehensive monitoring of the quality of all on-board services.
19.3.	<b>Suggestion forms</b> Suggestion Forms are processed as soon as possible to take action promptly in areas considered inadequate.
19.4.	Comments and observations of travel agents  Many passengers prefer to express their opinion directly to their travel agency. Comments and observations received through this channel are treated as those received directly.
19.5.	Complaints and disputes  Any complaint made by a passenger is assessed with due attention, as it attests to the Client's dissatisfaction.  Complaints received from the Customer Satisfaction Manager  See section 7.4.  The Booking and Sales Italy Office Manager manage requests for refunds, damages, and compensation.  Claims compensation and compensation:
	Claims, compensation and compensation: - Requests received before departure date are handled by the Passenger Office

	- Requests received after the departure date are handled by the Customer Satisfaction Office	
19.6.	Nonconformity of service providers and contractors  The goods and services provided or purchased by third parties and subcontractors are subject to systematic and planned checks. Appropriate actions are taken in the event of non-conformity with specific provisions and/or the purchase or procurement contract. These actions may include the supplier/contractor's resolution of the problem, the Company's intervention or termination of the contract.	
20.	CORRECTIVE AND PREVENTIVE ACTIONS  Corrective actions on the quality system and/or procedures set out in this Regulation may result from the Master and/or on-board Quality Committee's assessments or the systematic analysis of non-conformities and complaints filed by passengers.  The research and analysis of the causes of non-conformity or complaints are essential to improving the service and product quality. As far as possible and when the reasons are obvious and relate exclusively to the on-board services, corrective actions are implemented immediately. When the causes of non-conformities are not readily detectable or are not attributable to the on-board services, the on-ground quality manager is notified of the situation so that he/she may carry out the appropriate or necessary investigations. Even in this case, the entire process is adequately recorded (poor condition, causes determining it, corrective action, checking the adequacy and effectiveness of the action).	