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## RA-UPAX-001

## REGOLAMENTO AZIENDALE PER IL TRASPORTO PASSEGGERI & VEICOLI A SEGUITO

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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.
	<b>Purpose of the Regulations</b> 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.
	<b>Scope of the Regulation</b> 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.	<ul> <li>MANAGEMENT RESPONSIBILITIES</li> <li>Quality policy and objectives</li> <li>GRIMALDI LINES wants to make customised customer service one of its strengths.</li> <li>The Client is the Company's only source of income.</li> <li>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.</li> <li>A Customised and Quality Service are complementary and require a daily effort by all employees.</li> <li>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.</li> </ul>
2.	ORGANISATION
2.	OKGANUSATION         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
2.2	Our brand is Grimaldi Lines Brand Vision
3.2.	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
5.2.1	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.
	<ul><li>The booking request may come:</li><li>Directly from the Client</li></ul>
	<ul> <li>From the Travel Agency</li> </ul>
	<ul> <li>From the Tour Operator (Travel organiser)</li> </ul>
	<ul> <li>From the Peripheral or Foreign branch or General Sales Agent (G.S.A.)</li> </ul>
	At the Corporate sales points
	• From a telephone call, fax, correspondence, E-mail or the Internet (Business
	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.
4.5.	Travel contract
	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
	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.)
	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.

6	IDENTIFYING THE REQUIREMENTS OF THE SERVICES PROVIDED
	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
	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.
7 5	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
0.1.	Our principle is that every passenger must occupy the cabin (or spot) that was paid.
	our principle is that every passenger must occupy the cabin (or spot) that was paid.
8.2	General rule
0	Fare reductions and upgrading can be applied to:
	✓ Shipping company concession
	✓ Grimaldi group commercial reasons
	✓ Grimaldi group employees
8.2.1.	Shipping company concession
	The provisions of the shipping company are applied.
	For the application, the operator must have the certainty that the authorisation has been granted.
8.2.2	Grimaldi Group commercial reasons
	The sector executive manager's written permission is needed, and the company name or
	organisation to which the beneficiary belongs must be indicated.
	The amount of the discount must also be shown in writing.
8.2.3	Grimaldi Group Employees
	The shipping company must determine these discounts each year.
9.	CARRIAGE OF PASSENGERS AND ACCOMPANIED VEHICLES
9.1.	Definition
	An accompanied vehicle is any means used to transport people on the road, only if accompanied
	by a driver.
	Vehicles transporting goods and articles intended for marketing is excluded. The carrying of only one accompanied vehicle is allowed.
9.2.	Vehicles are loaded and unloaded at the risk of the driver passenger.
5.2.	If the driver passenger asks the port agent or crew for assistance during the loading/unloading of
	the vehicle, the related expenses and the risk remain with him/her.
9.3.	Vehicles with natural gas or LPG supply systems must comply with all applicable regulations on the
	matter, and this compliance must be duly certified in the vehicle registration documents. The client
	must notify the Company in writing if a vehicle with natural gas or LPG is being transported.
	During the time in which the vehicles are stored on board, the tank shut-off valves must be closed.
9.4.	Motor vehicles may be placed on any deck of the vessel, excluding those reserved for special
	provisions issued by the vessel master concerning the nature of the vehicles, type of fuel system,
	nature of the load in the vehicles, etc.
9.5.	Garage decks are not accessible to passengers during the crossing.

10.	PASSENGERS WITH REDUCED MOBILITY
10.1.	A passenger with reduced mobility (hereinafter referred to as PRM) is a person who cannot easily or freely move or requires assistance. Bookings and tickets are offered to PRMs under the same conditions as all other passengers. If PRMs are denied embarkation for safety reasons or inability
	due to the design of the vessel or infrastructure, they can choose between the entitlement to reimbursement and alternative transport.
10.2.	The PRM must inform of their specific needs for accommodation, seating place, services required or the need to transport medical devices during the booking or advanced purchase of the ticket. For any other type of assistance, PRMs must notify the carrier or terminal operator at least forty- eight hours in advance and present themselves at a designated place at the appointed hour, before the published embarkation time.
10.3.	If, due to his/her fault or negligence, a carrier or terminal operator losses or damages mobility equipment or other equipment used by disabled persons or persons with reduced mobility, he/she must offer compensation corresponding to the replacement value of the equipment in question or, where appropriate, repair costs.
10.4.	The Purser or another person in charge provides PRM assistance. If the vessel has been given prior notice of the arrival of a PRM, the Purser shall prepare the assistance needed for the regular course of the journey, from embarkation to disembarkation. The Purser indicates the cabins reserved to the PRM on the vessel plan and returns a copy to the Master.
10.5.	The staff on board selected to assist the PRMs must always and visibly wear white/blue armband showing the wording ASSISTANCE so that passengers can easily identify these staff members.
10.6.	The ticket office on land responsible for check-in must give the embarking PRMs with their vehicle a window sticker to be attached to the vehicle. When these vehicles arrive on board, they must be given priority and directed to the on board parking area reserved for them.
10.7.	Before arriving at the destination, the Purser sends the port agent indication of any ground transportation needs.
10.8.	In the case of emergency, the person entered into the Master List helps the PRM to reach the meeting point and embarkation points.
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.
11.2.	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.
11.3.	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
10	the competent authority of the country of origin.
12.	the competent authority of the country of origin. PREGNANT PASSENGERS
<u>    12.    </u> 12.1.	<b>PREGNANT PASSENGERS</b> 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
	<b>PREGNANT PASSENGERS</b> 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

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
13.4.	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
15.5.	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.	
13.0.	<b>Booking</b> 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
40.7	availability.
13.7.	Ticket
12.0	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:
	<ul> <li>✓ Check the availability of the kennel with the Crew</li> <li>✓ Callect the fee and issue a tight</li> </ul>
12.0	<ul> <li>✓ Collect the fee and issue a ticket</li> </ul>
13.9.	On board
	The Master must enforce the rules for the transport of animals. The presence of animals in a 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
12.10	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
13.11.	The limitations and restrictions for the transport of animals are required for the benefit of all
	passengers.
14.	PASSENGER REGISTRATION
14.	Checking passengers during embarkation / Counting passengers during intermediate stops
	According to the Ministerial decree dated 13 October 1999 (implementation of European Directive
	98/41), the Company implements a passenger registration procedure to:
	by Try, the company implements a passenger registration procedure 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 competent ministry of transportation through the General Command of the Port Authorities approves the registration systems.

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 in section 12.4.1.8 of the SMS Manual, the Purser sends the complete list of passengers to the PASSENGER REGISTRATION SYSTEM MANAGER within 30 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 dated 13/10/1999.

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 30 minutes before the vessel's scheduled departure time. The 30-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 for by Article 7 of Decree 13/10/1999, namely: readability, availability, functionality, and security. The same requisites are satisfied when the manual system is used.

The application of Decree 13/10/1999 is mentioned in the General Conditions attached to the ticket and are published on the website <u>www.grimaldi-lines.com</u>, these also include compliance required by Legislative Decree 196 dated 30 June 2003 "PERSONAL DATA PROTECTION CODE".

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 30 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 30-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
15.2	Each driver will receive a regular embarkation card during check in.
15.2.	On board arrangement
15.2	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.
16.	WORK INSTRUCTIONS FOR PORT AGENTS
16.1.	General
10.1.	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
10.2.	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:
	<ul> <li>Keeping passengers waiting too long on the ground must be avoided;</li> </ul>
	<ul> <li>Passengers must be embarked so that meals can be served at regular hours.</li> </ul>
	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
quay.
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:
Lines between Schengen area countries
- EU citizens must have a valid Identity Document valid for foreign travel
- Non-EU citizens without the obligation of a visa must have a valid passport
- "Non-EU immigrant citizens must have a valid passport and valid residence permit for a
Schengen area country or have a valid visa.
Lines to and from ports outside of the Schengen area
<ul> <li>From Italy to Countries not belonging to the Schengen area</li> <li>EU citizens require a passport, except for tourists with a documented hotel booking.</li> </ul>
- EO citizens require a passport, except for tourists with a documented noter booking. - Non-EU citizens need a passport (and visa, if necessary)

	<ul> <li>Unless they are nationals of the Destination country, Non-EU immigrant citizens must have a passport, valid residence permit or a visa for a Schengen area country.</li> <li>Those who are nationals of the Destination country must have a valid passport</li> <li>From Countries not belonging to the Schengen area to Italy:</li> <li>Those who are citizens of the Destination country and Non-EU immigrant citizens must have a valid passport and resident permit or visa for a Schengen area country</li> </ul>
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	<ul> <li>Passenger list</li> <li>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:</li> <li>The port agent prints the list directly from his/her computer.</li> <li>Passenger list for the Border Patrol</li> <li>For the lines to and from countries outside of the Schengen Area <ul> <li>The Purser provides the Border Patrol with the list. There may be local arrangements requiring that the Port Agent directly send the list.</li> </ul> </li> <li>For lines between Schengen Area countries: <ul> <li>A correct application of the Schengen Agreement does not require any lists since border controls are abolished.</li> </ul> </li> </ul>
16.2.4	SAR data Departure Message
	<ul> <li>Within 30 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: <ul> <li>a. Vessel Name</li> <li>b. The total number of passengers on board, divided as follows: <ul> <li>i. Number of crew members/staff;</li> <li>ii. Number of passengers older than 12 years of age (adults);</li> <li>iii. Number of passengers aged between 3 and 12 years of age (Children);</li> <li>iv. Number of passengers aged less than 3 years (Babies).</li> </ul> </li> <li>c. Total cargo on board, divided as follows: <ul> <li>i. Number of heavy vehicles (Trailers / Guided) and relative total weight for each deck;</li> <li>ii. Number of cars and relative total weight for each deck;</li> <li>d. Hazardous cargo on board, weight, and position (Bridge, ordinate)</li> </ul> </li> </ul></li></ul>
16.3	<b>Delay of the vessel</b> The passenger must receive information from the Company, its representative or through the person providing passenger assistance regarding the delay and its causes before the expected embarkation time. This information must also be sent to the authorities in charge. Subsequently, the Purser or a delegate will provide passengers on board with announcements containing the information every 30 minutes, according to instructions received from the Master.
16.4.	<b>Ticket sales</b> 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.	<b>Ticket sales to non-EU immigrant passengers</b> 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.	
10.0.	Drivers - Technicians - Family members
	Drivers:
	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
	Complaints regarding the ship or the on board service must be sent in writing to the Customer
	Satisfaction Manager, c/o Grimaldi Lines, Via M. Campodisola, 13 - 80133 Naples or to the e-mail
	address customer@grimaldi.napoli.it
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. 17.1.	General conduct
	<b>General conduct</b> Passenger Service personnel must wear the company uniform when on duty or in the passenger area.
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	The process as to the Ticket Office deals to sheels 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.
	$\checkmark$ 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
17.0.	
	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
4	or delegates, who climb aboard for official reasons.
17.7.	Smoking on board
	Italian laws on this matter are applied.

	The entire crew must work together to enforce the legal provisions on the subject.
17.8.	Cabin / Cabin Service/Services and Common Areas
	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.
17.10.	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.
17.12.	Meals for drivers
	Meals are included in the passage of drivers.
17.13.	Pre-paid meals
	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.
17.14.	Collection checking
	The catering contractor administers the restaurant, bars, and shops, and collections are within its
	jurisdiction.
	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.
17.15.	On-board sales of the passenger ticket or fare difference
	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.
17.16.	Currency exchange
	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
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	Navigation Code or any applicable International Agreement, and always within the 20 kg limit per
	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.	<b>Payment of collections to the Grimaldi Group</b> The Purser regularly pays the collections to the Grimaldi Group, by delivering them to the port agent of the principal Italian port.
17.19.	<b>Credit card payments</b> 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.	<b>Food Hygiene</b> 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.	<b>Bars</b> 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	<b>Bars - Crew services and prices</b> '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.	<b>Casino and Slot machines</b> 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.	<ul> <li>Front Desk</li> <li>Has the function of Information Office and Help Desk;</li> <li>This desk is under the responsibility of the Purser</li> <li>This desk is always opened during the crossing and embarkation/disembarkation</li> </ul>
17.25.	operations. <b>Store</b> 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 "duty-
	free" 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.
17.26.	Consumption on board during crossings entirely within the European Union
	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.
17.27.	Ecology, Cleaning, and Washing
	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.
17.29.	Passenger service suggestion forms
	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
17.29.1.	Suggestion form
	A questionnaire to uniformly and concisely gather the opinion of passengers has been created
17.29.2.	
17.00.0	A "Suggestion Form" must be placed in each cabin booked before the embarkation
17.29.3.	Collecting Suggestion Forms
	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
17.00.4	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
17.50.	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.
17.31.	Damage suffered or caused from/to passenger vehicles
	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
47.00	(information posted on board)
17.33.	Passenger Safety

<ul> <li>17.34. Medical Service See the ILCD 151 work instructions for the handling of passenger injuries on all vessels of the fleet.</li> <li>17.35. Drivers See section 15.</li> <li>17.36. Legislative Decree 13/10/1999 (European Directive 98/41 Title III SOLAS) See section 14.</li> <li>17.37. Pets See section 13.</li> <li>17.38. Delay of the vessel See IL UTUR04 (PROCEDURE FOR HANDLING DELAYS) for the handling of vessel delays.</li> <li>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.</li> <li>18. INSPECTIONS AND CHECKS See the SMS and H.A.C.C.P. manuals for inspections and checks of the services regarding passengers.</li> <li>19. CONTROL OF THE SERVICE AND NON-CONFORMING PRODUCTS</li> <li>19. 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:</li> <li>19. 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.</li> <li>19.3. Suggestion forms Suggestion Forms are processed as soon as possible to take action promptly in areas considered inadequate.</li> <li>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.</li> </ul>
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19.5 Complaints and disputes
Any complaint made by a passenger is assessed with due attention, as it attests to the Client's dissatisfaction.
<u>Complaints received from the</u> 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:
- Requests received before departure date are handled by the Passenger Office
<ul> <li>- Requests received after the departure date are handled by the Customer Satisfaction Office</li> <li><b>19.6.</b> Nonconformity of service providers and contractors</li> </ul>
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).