

Rebis

Società di revisione
e organizzazione
contabile di aziende



2018 TRANSPARENCY REPORT

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Sede di Pordenone

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Re.Bi.S srl

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1. Legal structure and governance

Legal structure

Re.Bi.S. (below the “Company”) is a limited liability company, based in Pordenone, Galleria asquini 1, tax code - VAT number and registration in the Register of Companies of Pordenone n. 01252700933.

The Company has as its object exclusively the activities of audit and assurance and accounting organization according to the law and is enrolled to the Registry of the statutory auditors with the n. 70446.

Ownership structure

The share capital is Euro 100,000.00 (100,000/00) and is divided into shares. The shares in which the share capital is divided are held by three owners, natural persons, in possession of the personal and professional requirements required by the law in force and by the Social Statute. All partners are registered in the Register of Auditors kept by the Ministry of Economy and Finance; reference partner is Dr. Carlo Brunetta Ph.D.

Governance structure

The Company is currently administered by a Sole Administrator in the person of its partner Carlo Brunetta.

The statutes provide that the Company may be administered, depending on what is decided by the Partners' Meeting on the occasion of its appointment, by a Sole Administrator or by a Board of Directors, composed of a minimum of three members.

The members of the Administrative Body must be partners, they hold office for the period provided for by the partners' Meeting at the time of appointment, even for an indefinite period, except for revocation due to cause or resignation.

The administrative body has the widest powers for the attainment of the social object without any limitation or distinction between acts of ordinary and extraordinary administration, unless by law or by statute it is reserved to the exclusive competence of the Assembly.



Within the corporate organizational structure, the other two members have been assigned the functions of Quality Control Manager and Head of the money laundering function.

Territorial organization

The Company carries out its activities through the offices of Pordenone, Padova and Trieste.

The Company's staff, including its members, is composed of twelve persons with different levels of professional seniority, six of which are registered in the Professional Orders of the Doctors of Accounting and Accounting Experts and in the List of Legal Auditors. In particular, in addition to the members there are six employees and three professional statutory auditors who work with the Company under a contract of continuous professional performance.

2. Network arrangements

Re.bi.S. doesn't belong to any national or international professional network, either directly or indirectly through its members or administrators.

3. Quality

The quality control system adopted for the management and conduct of audit tasks reflects the requirements of the ISA Italia 220 "quality control of the financial statement's audit" and the ISQC Italy 1 "quality control for qualified entities carrying out complete and limited financial statements reviews, as well as other tasks aimed at providing a level of reliability to related information and services".

The quality control system is formalized in a manual, approved by the members with a special resolution, which is divided into the following sections:

- A) The apical responsibility for quality
- B) The applicable ethical principles
- C) The acceptance and maintenance of the relationship with the customer and of the single assignments
- D) Human resources
- E) The execution of the assignment
- F) The monitoring



The procedural system is brought to the attention of all the professionals and collaborators of RE.BI.S. through specific training courses and through the publication of the Quality Manual on the company server.

On October 23, 2018 the assembly of Assirevi (Italian Association of Auditors) decided the admission of Re.bi.S. to member of the association, so a first step towards further improvement of its manual on general quality control procedures is therefore completed. Assirevi promotes the scientific analysis supporting the adoption of the revision principles as well as the study of the evolution of legislation and to date brings together 16 auditing companies, or the majority of the companies that carry out the audit of Public Interest Entities.

A) APICAL RESPONSIBILITY FOR QUALITY

The Sole Administrator appoints the Quality Control Officer, who is responsible for updating the quality control manual in the light of new regulations and monitoring the application of these regulations. At the moment Partner Cristina Lonciari holds this position.

The person in charge also has the task of resolving, with the help of other partners or external consultations, any issues on integrity objectivity, confidentiality and professionalism.

B) THE APPLICABLE ETHICAL PRINCIPLES

Independence, integrity, objectivity, confidentiality and professionalism are the fundamental principles behind the audit activity, all the professional staff of Re.bi.S. must comply with these principles.

Independence: formal and substantive, both as a mental attitude and as a lack of incompatibility under law or regulations.

All staff of Re.bi.S. must take an independent mental attitude in carrying out the audit assignment. The assignment must be carried out with impartiality (objectivity), integrity and without any direct or indirect interest with the company that has conferred the assignment, with the company being reviewed (if different), its members, directors and management.

Therefore, the auditor will have to refuse to carry out an assignment in circumstances that may influence his judgement, or that may raise in third parties the legitimate doubt of lack of independence. The auditor's intellectual honesty is therefore not sufficient, but the objective condition that the auditor be recognised as independent from third parties is necessary.



In the context of the delegations approved by the Sole Administrator of Re.bi.S., the management of issues relating to independence is the responsibility of the person in charge of the quality control function, in the person of his manager, delegated by the Sole Director.

C) THE ACCEPTANCE AND MAINTENANCE OF THE RELATIONSHIP WITH THE CUSTOMER AND OF THE SINGLE ASSIGNMENTS

Re.bi.S. has established a procedure of attestation of independence from all the operating partners already towards a potential client before the preparation of a proposal.

Before providing its certificate on the existence of the requirement of independence, each operating partner assesses the aspects foreseen by Legislative Decree 39/2010.

The attestations of independence are provided following request mail sent through the management software in use at Re.Bi.S. It sends email requests to the operating members who, examined the documentation loaded on management software, supply attestation of independence through appropriate flag.

The presentation to the customer of the proposal and therefore the acceptance of the assignment is subordinated to the preliminary examination of the proposal from the operating associates, who will have to authorize the shipment to the customer.

The partners must first assess that there are the conditions for acceptance of the assignment with reference to:

- professional and independence requirements,
- the firm's ability to carry out the assignment,
- professional risks associated with the assignment.

In the decisions of acceptance and maintenance of the job the associates will have to estimate the professional risk inherent in the same assignment. In particular, the following should be assessed:

- general risks,
- financial risks,
- integrity of the client and its related parties.

Requests for proof of independence at the opening of the order: when you proceed with the opening of a new engagement, following acceptance of the offer by the customer, requests for attestation of independence are sent through the management to all staff. Once the documentation uploaded on the management software has been examined, the staff will provide the declaration of independence directly with a flag (or refuse in case of failure of the requirement).



Attestation of independence of team members: with the upload of the work team on the management software, it automatically sends e-mails requesting independence to team members. Once the documentation uploaded on the management software has been examined, the staff will provide the declaration of independence directly with a flag (or refuse in case of failure of the requirement).

The partner in charge of the work shall be responsible for informing the other partners of any problems arising in the course of the work and the issue of the report

Consequently they will have to evaluate the maintenance or not of the customer and to agree the eventual measures. In any case, the annual maintenance procedure is provided for those assignment which continue in the following financial year.

For the purpose of carrying out the annual maintenance procedure, a special form, also provided for in the audit manual, shall be completed, indicating the relevant information.

Each auditor, during the entire term of the contract, must report to his work team and to the administration any change in the social structure and other positions, of which it becomes aware, as provided for in the work programmes and audit manual in use, both for the sake of independence and for the anti-money laundering rules.

It is also established:

- the procedure for the regulation of “business relations” and the “holding of financial interests”,
- the procedure for regulating the recruitment of “conflicting activities” and for carrying out activities in favour of “subjects in conflict”,
- the procedure for the acceptance of non-audit assignments,
- the procedure of acceptance by any partner, manager or staff, of personal corporate offices and professional appointments,
- the procedure for resignation by audit staff and appointment to managerial positions with clients who are not public-interest entities

These procedures are illustrated in appropriate sections of the quality manual.

D) HUMAN RESOURCES

A careful and shared procedure of search, selection and recruitment of staff or use of collaborators is followed.

Staff shall be provided with a high level of training and competence. During the course of the year, the staff took internal and external courses, divided by professional level and inter-hierarchical courses.



Both internal manuals and documents necessary to guarantee competence and professional updating are continuously updated and made available to all staff, including on specialist topics and/or sectors

The hours of training carried out are loaded into the management software in use by all employees, thus allowing monitoring and updating by partners and quality manager. In addition, the administrative office, keeps an updated file where the topics covered by the refresher courses are summarized, in which everyone participates also individually.

Evaluation of staff performance and progress shall take place annually.

The partners are responsible for planning and assigning tasks. On indication of the partners, from time to time, can be appointed a person in charge of planning. The timetable and staff assigned to the tasks shall be discussed and approved with those appointed by the responsible partner to direct the work.

Every year a global and a single office planning is prepared for the period 1 July to 30 June of the following year.

The assignment of tasks shall ensure that personnel with the level of training and technical preparation appropriate to the nature of the audit task are present on the individual work and reasonably allow the work carried out to comply with appropriate levels of quality. The assignment of jobs is realized on the basis of specializations.

The following factors shall be taken into consideration:

1. the size and complexity of each assignment, with consequent staffing and time requirements for each specific task,
2. availability of staff, including in terms of experience and preparation,
3. particular skills required,
4. supervision and participation of senior staff,
5. schedule of work to be carried out,
6. continuity and regular rotation of staff,
7. job training opportunities,
8. possible situations of independence and conflicts of interest.

In the planning of assignments, the minimum requirements set by the general criteria of the CONSOB communication n. 96003556 of 18 April 1996 are observed.

The hours planned on each job and divided between the work team are then uploaded to the management software as budget hours for each team member. The summary planning document is stored on the company server for staff.



Planning is periodically monitored with final data and updated in relation to new assignments.

E) THE EXECUTION OF THE ASSIGNMENT

Partner in charge assigns the job to a manager. That activity is realized during the general pianification of audit engagements.

. The person in charge of the management must plan the audit work.

The planning process shall take into consideration:

- financial statements areas with particular concerns; a
- specialist knowledge of staff;
- current economic conditions which may affect client activity and influence audit performance;
- level of risk attributed to the assignment;

The assignment shall be carried out using the audit manual documentation. The manual is available on the company server and is always accessible by the working team even with remote connection.

Other Re.Bi.S. srl quality targets:

- continuous implementation and improvement of audit manual. It is brought to the knowledge of all personell involved in audit activities;
- continuous comparisons between managers about problems encountered during audit activity and at the moment of acceptance and maintenance the assignment; meeting with the staff to discussing about principles accounting problems recognized during audit activities.

Consultation must be pursued and encouraged at all levels. Consultation may be internal or external in relation to the problems to deal with. In case of complex audit problems, is provided an external consultation

Each member of team is responsible for supervising and reviewing the work of less experienced members.

Supervisors have to verified that the timing and the audit program are respected and the adequacy of the resources employed.

In the course of carrying out the assignmemnt, the ordinary review shall provide for verification that the problems identified have all been resolved or adequately



highlighted, that the procedures have led to the objectives set and the budget judgment is adequately supported by the work carried out.

The review is realized during and at the end of the assignment. The audit report must be issued only after this stage.

If the subject of the audit is the financial statement of a PIE or of an entity that has been attributed HIGH risk, there shall be an activity of “Second Partner Review”, by another shareholder not involved in the particular assignment, prior to the issue of the Report.

The Second Partner Review is formalized by compiling the specific form provided by both quality control manual and audit manual.

F) THE MONITORING

From the objective point of view, relating to the entity that is controlled, there are two typologies:

1. HORIZONTAL monitoring: it covers all quality procedures and it is relating to quality controls about the GENERAL ORGANIZATION OF THE AUDITOR.
2. VERTICAL monitoring: it covers the single assignment and single procedures that interact with this; it is also relating to the quality control during AUDIT ACTIVITIES.

From the subjective point of view, relating to the monitoring entity, there are two other typologies:

1. 1st level of monitoring (INTERNAL)
2. 2nd level of monitoring (external)

Quality monitoring relies on examination and cross-checking between the teams of different assignments as well as performance of independent audits carried out between members, both carried out continuously.

The control quality manager is informed about the results of checks.

The internal quality manager realizes annual samples checks. The purpose is to ensure the respect of quality procedures and to supervise the audit activity.

The quality Manager considers both the necessity to adapt directives and procedures and the adoption of disciplinary measures.

Periodically the activity's results are discussed during the partners' meeting and external personell. During the meeting are analysed all opportunities of improvement of professional services offered.



The assignment of independent expert for external audit was recently conferred to an external auditor.

The administrative organ considers that the internal quality control system adopted and described in the previous section has ensured the respect of applicable rules and technical-professional principles during audit activities.

4. Inspecting our audits.

So far Re.Bi.S. srl has not been controlled by the Italian supervisory authority (Consob).

5. List of Public-Interest Entities whose financial statements have been audited during 2018.

During the financial year closed at 31st December of 2018 Re.Bi.S. srl has audited the financial statements of these Public-Interest Entities:

CENTROMARCA BANCA Credito Cooperativo di Treviso S.C. per Azioni
CASSA RURALE ED ARTIGIANA DI CORTINA D'AMPEZZO E DELLE DOLOMITI S.C.

6. Declaration by the administrative organ of Re.Bi.S.srl in accordance with the Article 13 paragraph 2 letter d) of European Regulation 537/2014, concerning the internal quality control system.

In accordance with the Legislative Decree n. 29 of 27th January of 2010, Re.Bi.S. srl declares that the internal control system adopted and described briefly in the previous section n.3 of the Transparency Report, has assured the respect of applicable rules and technical-professional principles during audit activities.

7. Declaration by the administrative organ of Re.Bi.S. srl in accordance with Article 13 paragraph 2 letter g) of the European Regulation 537/2014 relating to the adoption of appropriate measures to ensure the independence of the audit firm.

In accordance with Legislative Decree n.39 of 27th of January 2010, Re.Bi.S.srl has adopted during the year 2018 the independence directives and procedures described in the previous section n.3 of the Transparency Report. These directives and procedures are appropriate to ensure the respect of the dispositions contained in the articles 10, 10-bis, 10-ter, 10-quater, and 17 of the Legislative Decree n. 39 of 27th of January 2010.

These measures also include the internal checks about the conformity of the provisions of independence.

8. Declaration by the administrative organ of Re.Bi.S. srl in accordance with Article 13 paragraph 2 letter h) of the European Regulation 537/2014 relating to the adoption of appropriate measures to ensure continuous training programmes.



Re.Bi.S. considers continuous training and updating indispensable for all personnel. In accordance with Legislative Decree n.39 of 27th January 2010, Re.Bi.S. srl declares that the measures explained in the previous Section 3 of Transparency Report can ensure the respect of dispositions about continuing training included in Article 13 of Directive 2006/43/CE and in Article 5 of Legislative Decree n.39 of 27th January 2010.

9. Business performance and financial Informations.

Re.Bi.S. revenues for financial year 2018 are shown below. The results are classified in accordance with the Article 13 paragraph 2 letter k) of the European Regulation 537/2017.

At the issue's date of this disclosure, the financial statement isn't been approved yet by shareholders' meeting.

Activities	Revenues €
i) revenues from the audit of the financial statement and consolidate financial statement of public interest entities and institutions that belong to a group of companies whose parent company is a public interest entity.	99.659,98
ii) revenues from audit of financial statement and consolidate financial statement of other institutions.	199.601,91
iii) revenues from permitted non-audit services provided to audited entities by auditor or audit firm	0,00
iv) revenues from non-audit services provided to other institutions.	265.622,45
v) revenues from voluntary audit of the financial statement and consolidate financial statement of other institutions.	27.720,00
Totale	592.604,34

10. Partners' remuneration.

At the moment partners' remuneration includes a fee discussed among the members in the absence of deliberate and approve regulation by the partners' meeting.

Pordenone, 4th of April 2019

Carlo Brunetta
Sole Administrator