



## CARNIVAL CORPORATION & PLC “HUMAN RIGHTS POLICY”

### Our Company

Carnival Corporation & plc operate a portfolio of leading global, regional, and national cruise brands that sell tailored cruise products, services, and vacation experiences. The two companies operate under a single senior executive management team and identical Boards of Directors. Carnival Corporation & plc are referred to collectively throughout this policy as the “Company,” “our”, “we”, and “us”.

### Our Commitment to Human Rights

As one of the world’s largest leisure travel companies, we have the privilege to interact with many thousands of people every day, including our guests, employees, business partners, and local partners in the varied destinations that we operate in and visit. We recognise the role we play in society and the responsibility and opportunity that we have to positively impact human rights globally. In support of this we maintain an active focus on both global factors and internal operations to ensure that we are able to identify any potential human rights risks or opportunities and align our efforts accordingly.

At Carnival Corporation & plc, our mission & purpose is to deliver unforgettable happiness to our guests by providing extraordinary cruise vacations, while honouring the integrity of every ocean we sail, place we visit and life we touch. This policy is issued in support of the detailed principles contained in the Carnival Corporation & plc Code of Business Conduct and Ethics [\(link\)](#) and other related policies.

This policy is also an expression of our commitment to promote and foster human rights in line with the principles set out in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the ILO’s Core Labour Standards as codified in the eight core conventions.

Where national law and international human rights standards differ, our policy is to follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

The Board of Directors has overall responsibility for overseeing compliance with this policy. The leadership team at each of our operating companies is responsible for implementing this policy at their respective operating company and ensuring compliance, while the Global Ethics & Compliance Team monitors these efforts. Our corporate governance model provides the structures and processes for the direction and control of our Company. Good corporate governance, effective ethics and compliance, and risk management processes help us operate more efficiently.

We educate all of our employees on our expectations and commitments in relation to human rights via our Code of Business Conduct and Ethics, which is available to our employees on our intranet sites and publicly on our external websites, and the corresponding computer-based training course. All employees are introduced to the Code of Conduct during the on-boarding process, and it is regularly promoted in emails and news articles posted on our intranet sites.

## Our Culture

We are committed to living up to the highest standards of ethical behaviour and integrity and recognise that it takes commitment from every one of our people to create a stronger, more inclusive culture. We have therefore created our Culture Essentials which are the non-negotiable beliefs and behaviours that define who we are, what we stand for, and how we operate. They connect us to each other and the organization and serve as guiding principles that all of our employees, at all levels, shipboard and shoreside, must embrace and model to help us deliver our mission & purpose.

We celebrate diversity and promote inclusion, appreciating the value of our rich cultural tapestry of employees. We take decisive action to foster a welcoming and purposefully inclusive environment where people from different backgrounds, experiences, and walks of life can succeed, while feeling safe, respected, valued, and cared for, and where they are given an opportunity to form meaningful connections with each other.

We listen actively and seek to understand, because we believe each and every person has unique talents and strengths and that the more perspectives we have, the better the decisions we make. We value the diversity of humanity, which includes differences in gender, age, race, ethnicity, and national origin, range of abilities, sexual orientation, gender identity, financial means, education, and political perspective. Discrimination, harassment and abuse are never tolerated. Every one of us, regardless of level or role, speaks up when we see something wrong or that doesn't seem right, trusting our voices will be heard. We work with a number of partner organisations, including Catalyst, The Executive Leadership Council Inc. and The International LGBTQ+ Travel Association and have earned a perfect score of 100 from the Human Rights Campaign, the leading LGBTQ+ civil rights organisation in the United States, for six consecutive years.

## Our People

Our shipboard and shoreside employees are the heart of our business, and we are driven by the passion and dedication of our teams. Providing a safe and healthy environment and working conditions for our employees, and all others, including third parties working for us or on our behalf, is at the core of what we do every day. We are continually working to expand our well-being programs to support their physical and mental health, encourage social connectivity with family and friends, and promote a balanced lifestyle.

We comply with the requirements of various employment protection laws that apply to our business across our varied jurisdictions. In particular, we adhere to the Maritime Labour Convention (“MLC”) from the International Labour Organisation (“ILO”) which sets minimum international standards for working and living conditions of seafarers. As such, we understand the importance of ensuring that working hours comply with legal limits and that our employees receive fair compensation and benefits, relative to relevant market rates. We also maintain good relationships with unions and work in partnership to ensure that we comply with relevant national employment law requirements, as well as respect and understand employees’ rights in terms of freedom of association and collective bargaining.

## Diversity, Equity, and Inclusion

Over and above our legal responsibilities, we strive to be an employer of choice by providing our employees with an inclusive and supportive company culture and work environment with equal opportunities for professional growth throughout their career path.

We celebrate diversity and promote inclusion, appreciating the value of our rich cultural tapestry of employees. We believe each and every person has unique talents and strengths that they bring to our business, and welcome and celebrate the diversity of gender, age, race, ethnicity, and national origin, range of abilities, sexual orientation, gender identity, financial means, education, and political perspective. Discrimination, harassment, and abuse are regularly monitored and are not tolerated. We work with a number of partner organisations, including Catalyst and The Executive Leadership Council Inc., and have earned a perfect score of 100 from the Human Rights Campaign, the leading LGBTQ+ civil rights organisation in the United States, for six consecutive years.

We also work to ensure that our workplace is free from harassment, which would include any form of unwelcome conduct by one person toward another that has the purpose or effect of creating an intimidating, hostile, or offensive work environment. Retaliation of any kind is not tolerated, and employees are actively encouraged to speak up if they feel they have been retaliated against.

## Health, Environment, Safety, and Security

We operate robust management systems to ensure compliance with all relevant health, environment, safety, and security laws, including applicable maritime legislation. The principles of our policies and procedures focus on prevention, detection, response, and correction. All incidents are monitored, tracked, and investigated to prevent future occurrences, and we have a number of reporting channels, which employees are encouraged to use, not only to report incidents or wrongdoing, but also to give suggestions on how things can be done better.

## Our Business Partners

As a global business, we work with thousands of suppliers, vendors, distributors, consultants, agents and any other third parties who do business with us or on our behalf (collectively "Business Partners") from countries all over the world. Recognizing that standards and practices vary from country to country, we enforce a Business Partner Code of Conduct that all of our Business Partners and their supply chain partners are contractually required to comply with. The Carnival Corporation & plc Business Partner Code of Conduct ([link](#)) sets out our expectations on Business Partners to follow all applicable laws and regulations and to promote ethical decisions in all aspects of their business. It also outlines our stance on human rights and communicates our no-tolerance policy on bribery and corruption. We also expect our Business Partners to be aware of our sustainability agenda and to work with us as partners for change in helping to achieve our goals and targets through their service provision.

We have established a global Responsible and Sustainable Sourcing Policy ("RSSP") which provides guidelines and recommendations to help Business Partners meet our mandatory minimum requirements for compliance and progress towards industry best practice. Under the RSSP all Business Partners are expected to respect human rights through their business activities.

Each principle covered in the RSSP is supported by a separate detailed Supplier Standard ("Standard") outlining our approach to supply chain due diligence and describing how Business Partners are expected to put our minimum requirements into practice. The Standard on Labor and Human Rights outlines the principles we expect our Business Partners to meet, including: prohibiting human trafficking, forced and child labor; reinforcing the right to freedom of association; ensuring non-discrimination, lawful working hours and wages; ensuring safety and security of the working environment; and adopting appropriate grievance mechanisms.

The RSSP is also complemented by a Health and Safety Standard and an Environmental Protection Standard which further reinforce our commitments to Human Rights and our expectations of Business Partners.

We take a risk-based approach to carrying out due diligence with new and existing Business Partners. If we detect any potential risks or noncompliance through the process, we may require the Business Partner to implement a remediation plan, or, in certain circumstances, we may suspend or terminate the business relationship and any related contracts.

## Modern Slavery and Human Trafficking

We condemn all forms of exploitation and forced labor and are actively working to prevent any Modern Slavery in our supply chains. Our Modern Slavery Statement ([link](#)) lays out our commitment and approach to preventing Modern Slavery and Human Trafficking and to complying with all relevant laws.

## Global Talent Partners

Our teams onboard are comprised of many nationalities, so we engage Global Talent Partners (“GTPs”) who help us to find and recruit the best people. Our Company has worked with the same primary employment agencies in a number of countries, including Indonesia, India, Vanuatu, and the Philippines, for several decades. We routinely conduct audits of these agencies and require them to be certified in line with the MLC, to ensure that fundamental human rights are respected and upheld at all times.

## Our Environment and Communities

As we are welcomed by communities around the world, it is our responsibility to support those communities to maintain their cultural heritage, local traditions, history, and natural environments. Our reputation and success depend on supporting sustainable tourism practices and working with local communities. We regularly participate in local initiatives such as beach clean-ups and conservation efforts to preserve and improve the natural environment in the destinations we visit.

Having access to a healthy environment has recently been formally recognized by the United Nations Human Rights Council as a fundamental human right. Protecting the environment is central to our mission & purpose, and we continuously seek to innovate and improve our vessels, processes, and operations, ensuring our guests can continue to cruise in even cleaner, and more efficient and sustainable ways.

Further information on our environmental efforts can be found in our current Sustainability Report (<https://carnivalsustainability.com/>).

## Our Speak Up Policy

We recognize that our policies and programs may not prevent all adverse human rights impacts in our business operations or in our supply chain, and we are committed to enabling remedy where we have caused or contributed to those impacts and to using our leverage to encourage our Business Partners to provide remedy where we find impacts directly linked to our business operations, goods, or services.

Speaking up is an essential part of our culture. It is only by speaking up and being transparent that we can listen, learn, and improve. Therefore, we expect and encourage anyone, both internally and externally, to speak up if they see or suspect something that doesn't align with the law or with the expectations we have set out in this policy. All reports are taken seriously and handled sensitively, and we do not tolerate retaliation of any kind. Reports can be made through our dedicated hotline which is monitored by an independent third party and available 24 hours a day, seven days a week, or via the corresponding internet portal as set forth below.

**Hotline** (toll-free in North America): +1-888-290-5105  
**International:** +1-305-406-5863  
**Internet portal:** [www.carnivalcompliance.com](http://www.carnivalcompliance.com)

Should it become apparent at any point that our company has caused or contributed to a negative human rights impact, the Global Ethics & Compliance Department should be advised.

We expect our Business Partners to operate with the same high standards to which we hold ourselves. This expectation includes having an effective operational-level grievance management system in place, meaning a formalized means through which individuals may raise concern about the impact their operations may have on their human rights. We require our Business Partners to prohibit retaliation against individuals who raise concerns about their practices.

[Our Future Commitments](#)

In order to live up to the aspirations laid out in this Policy, we understand the importance of continually evaluating and assessing our approach and efforts in relation to protecting and promoting global human rights. Through our Sustainability Goals (<https://carnivalsustainability.com/>), we are placing a long-term focus on continuing to increase the positive impact that we deliver.

Approved by the Board of Directors Approval Date: 19 April 2023 Revision Number: 1
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