

Labor and human rights in our supply chain standard

The Carnival labor and human rights in our supply chain Standard (“Standard”) sets out our requirements for our Suppliers to ensure their workers’ human rights are respected and promoted.

This Standard outlines the requirements and practices expected from Carnival’s Suppliers and specifies how to implement our [Responsible Sourcing Policy](#) (“Policy”). The Standard specifies both our labor and human rights management requirements and labor and human rights protection requirements and outlines how we verify that Suppliers meet our expectations.

As we navigate this journey with our suppliers to ensure that we have effective responses to prevent and address negative impact on labor and human rights, we are committed to evaluate options, work with various stakeholders, and adjust our path as needed. As a result, the Standard may be updated from time to time.

The Carnival Responsible Sourcing Policy

As part of our commitment to responsible business practices, we require our Suppliers to abide by the Carnival [Responsible Sourcing Policy](#), which requires compliance with all applicable laws and regulations, the Carnival [Business Partner Code of Conduct](#) (BPC), the Carnival [Human Rights Policy](#), the Carnival [Health, Environmental, Safety, Security and Sustainability Corporate Policy](#).

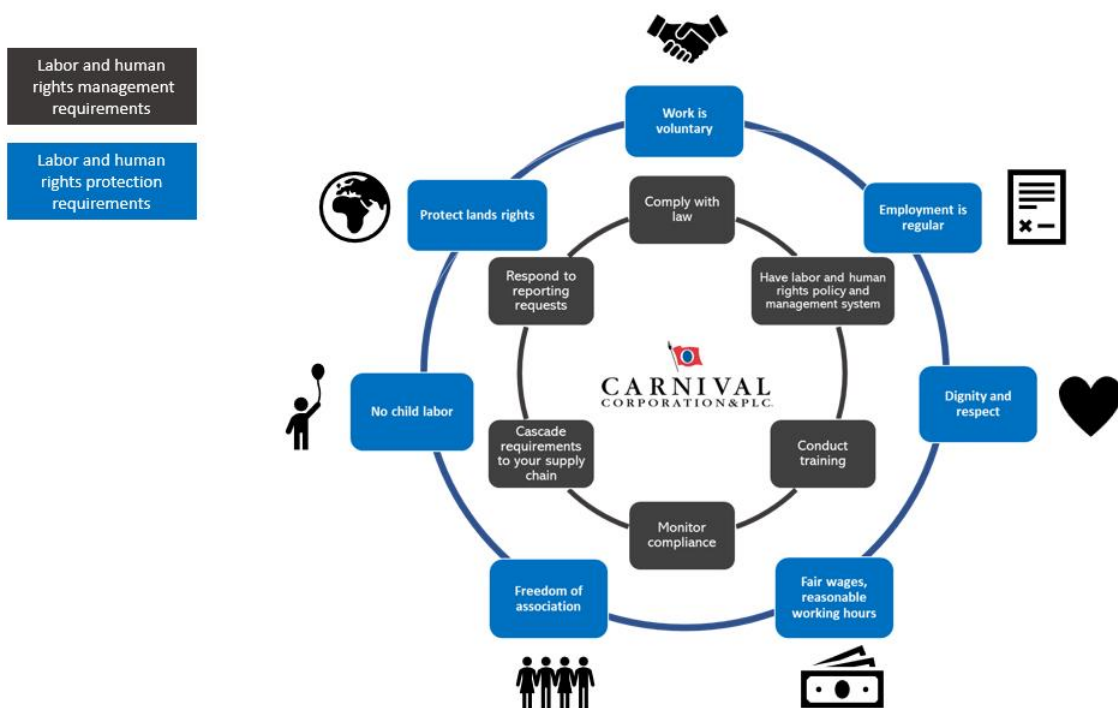
Requirements

The following listed requirements are a comprehensive, but not exhaustive list of Carnival’s supply chain requirements on labor and human rights. They are complementary to and are not intended to replace or supersede legal requirements. As a minimum requirement, all Suppliers their affiliates, and their workers, must:

- **comply with all applicable laws and regulations**
- **implement their own labor and human rights practices and training in alignment with relevant laws, guidelines and industry codes related to international labor and human rights standards.**

In situations where laws applicable to our Suppliers are more stringent than our policies and standards, our suppliers must follow the applicable laws. Where local laws or their enforcement fall below the Carnival’s Standard requirements, the expectation is for these requirements to be met. Carnival expects our Suppliers to uphold the rights expressed in the International Bill of Human Rights, and the International Labor Organization (ILO) core and other applicable conventions in their own operations and business relationships across their supply chain. This means Suppliers are expected to implement policies and due diligence procedures to detect, prevent, mitigate, and remediate any adverse impacts of their operations and supply chain on human rights.

Labor and human rights requirements chart overview



Labor and human rights management detailed requirements

Respecting our Policy and commitments requires Suppliers to meet the following general requirements:

Develop and implement a clear and publicly available policy and due diligence management system	This is to support the detection, prevention, mitigation and remediation of adverse impacts of their operations and supply chain on human rights. Policies and procedures must be updated periodically. This should be proportionate and commensurate” to the Supplier’s specific circumstances, including its size, capacity, resources, and leverage. Suppliers should assign a responsible person (or department) with documented roles, responsibilities, and authority to make sure their policy commitments are achieved, that regulatory compliance is maintained and that labor and human rights standards are met. The labor and human rights policy and associated management system must be endorsed by senior management. The scope of the policy should include, at a minimum, all the labor and human rights principles of the Ethical Trade Initiative (ETI) Base Code . The formal due diligence system should account for the human rights of all their workers whether they are directly and indirectly employed, including those that work remotely.
Conduct regular training to ensure effective implementation, improvement and compliance with their labor and human rights policies and procedures.	Suppliers must ensure that workers receive regular and recorded training on their labor policies and procedures, and that such training shall be repeated for new or reassigned workers. Relevant policies and procedures must be widely communicated throughout the Suppliers’ organization.
Monitor compliance to the required minimum requirements and established procedures and systems to manage, track and monitor impacts	Proactive action for continuous improvement in labor and human rights practice must be taken, including setting improvement targets, and tracking and monitoring how they progress against these targets.
Cascade labor and human rights	Suppliers must communicate proactively these requirements to their own

requirements through their supply chain	Suppliers and monitor their compliance.
Respond to labor and human rights related reporting and information requests	Such request may include as third-party verification, transparency of the impacts identified, and the actions taken or proposed. Carnival may also periodically assess and audit Suppliers in relation to their labor and human rights practice. Suppliers must disclose to Carnival what due diligence they performed to determine whether their supply chain is free of minerals or materials from conflict regions and provide relevant documentation upon request. Data may be used by Carnival to comply with the reporting and disclosure requirements of all relevant supply chain due diligence laws.

Labor and human rights protection detailed requirements

Respecting our Policy and commitments requires Suppliers to meet the following labor and human rights protection requirements:

Work is conducted voluntarily, on the basis of freely agreed and documented terms of employment	<p>Employment must be chosen freely and conducted voluntarily. Suppliers must evaluate and mitigate risks of human trafficking and modern slavery in their operations and must not produce goods or services for Carnival using or benefiting from any form of slavery or human trafficking such as forced, bonded, indentured, or involuntary prison labor in their own operations or their supply chain.</p> <ul style="list-style-type: none"> Workers must not be charged recruitment or employment fees of any kind, including lodge any part of their salary, benefits, property, or documentation as a condition of employment. Workers must not be required to lodge "deposits" or their identity papers with their employer. Workers must have the right to leave their employer after reasonable notice and this includes migrant workers who must be free to leave or change employment. Workers must have freedom of movement in both their workplace and living quarters.
Regular employment is provided	<p>To every extent possible work performed must be based on recognized employment relationship established through national law and practice.</p> <ul style="list-style-type: none"> Workers, both permanent and temporary, must be provided with employment documents that are freely agreed and which respect their legal and contractual rights. Workers must be provided with a contract in a language understood by them prior to entering employment outlining their conditions of employment including information about the payment of wages, such as pay periods and frequency, overtime standards and calculation, and any conditional or discretionary payments.
Workers are treated equally, with dignity and respect	<p>Suppliers must comply with all applicable laws, treat their workers with dignity and respect, and must endeavor to provide equal opportunities and fair treatment to all workers.</p> <ul style="list-style-type: none"> Suppliers must have clear policies and procedures to ensure no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Particular attention must be paid to the rights of workers most vulnerable to discrimination. Suppliers should not permit any harsh or inhumane treatment of workers. No worker must be subject to any physical abuse or discipline,

	<p>the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation such as punishment, bullying, or other harmful treatment.</p> <ul style="list-style-type: none"> Suppliers must have an anti-harassment and non-discrimination policies that are provided to all workers.
<p>Workers are paid fair and competitive wages and working hours are reasonable.</p>	<p>Suppliers must comply with internationally recognized applicable wage and hour and benefits standards and laws, including standards and laws governing minimum wages, maximum hours, days of service, rest periods, overtime pay and restrictions, worker benefits, and leaves of absence.</p> <p><u>Wages</u></p> <p>Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <ul style="list-style-type: none"> Workers must be paid a compensation package on time and in full without discrimination based on gender or any other factors. For remuneration based on production, quotas, or piecework, calculations are transparent, equitable and objective. The rate of pay must enable workers to earn at least the minimum wage, or the wage outlined in a collective bargaining agreement, whichever is higher, during normal working hours. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded. All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Wage slips are provided in a language understood by workers, clearly outlining the wage, overtime, benefits, deductions, leave, social security, and other details as per local law. Appropriate provisions should be implemented to account for relevant languages or low literacy levels. <p><u>Working hours</u></p> <p>Suppliers must have in place clear policies and procedures defining normal working hours and overtime, including a process by which workers can volunteer for overtime. Working hours must be defined by contract and must the limit allowed by the law of the country where the workers are employed, collective agreements and the provisions below based on international labor standards., whichever affords the greater protection for workers.</p> <ul style="list-style-type: none"> Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. All overtime work by workers is on a voluntary basis, must not exceed 12 hours per week and always be compensated in accordance with local laws and at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by the clause below.

	<ul style="list-style-type: none"> Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14 day-period. <p>For seafarers workers, the applicable requirements are defined in the Maritime Labour Convention (MLC) and other relevant maritime conventions.</p>
Suppliers respect the Freedom of Association and recognize the right of collective bargaining	<p>Suppliers must respect the rights of workers to join or form trade unions of their own choosing and to bargain collectively in accordance with applicable laws and the customs of the countries in which they are employed.</p> <ul style="list-style-type: none"> Suppliers must adopt an open attitude towards the activities of trade unions and their organizational activities. Workers must not be intimidated or harassed in the exercise of their right to join or refrained from joining any organization. Suppliers must ensure that workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, suppliers must facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.
Workers are of an appropriate age	<p>Suppliers must comply with all applicable child labor laws, including laws governing minimum age requirements and hazardous or night work. These policies and procedures shall conform to the provisions of the relevant ILO standards. As a fundamental principle, there must be no new recruitment of child labor.</p> <ul style="list-style-type: none"> Suppliers must have in place an employment policy which prohibits the use of child labor, outlines a procedure for age verification, a remediation process for child labor and outlines the conditions by which young persons can be employed. In accordance with international labor standards, suppliers must not employ individuals under the age of 15 or under the age of finishing compulsory education, whichever is higher (subject to exceptions permitted by local laws or applicable portions of the ILO Declaration on Fundamental Principles and Rights at Work). Children and young persons under 18 shall not be employed at night or in hazardous conditions. When young workers between the ages of 15 and 18 are employed, they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school. Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education until no longer a child. Upon identification of child labor, immediate action must be taken to remove the child from all work and ensure the child is in a safe place. Effective and timely remediation must put the best interests of the child first and include adequate social support for the child and its family.
Suppliers protect and promote land rights of	<p>Suppliers must demonstrate legal right to use the land.</p> <ul style="list-style-type: none"> The rights and title to property and land of the individual, indigenous people and local communities must be respected. All negotiations

communities, including indigenous people	<p>about purchasing, leasing, extracting from or otherwise using property, natural resources or land, including the use of and transfers of it, must adhere to the principles of free, prior and informed consent, contract transparency and disclosure. Carnival has zero tolerance for land grabbing.</p> <ul style="list-style-type: none"> Suppliers must undertake risk assessments with respect to impacts on nearby communities and land rights.
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Scope

This standard applies to all suppliers managed by our global sourcing function during the launch phase of our global responsible sourcing program. The scope will be progressively extended to all suppliers as we advance the implementation of our program. It is our suppliers' collective responsibility to ensure compliance with the RSP and this standard in their operations and throughout their supply chains through communication, education, and verification.

Verification of Compliance

Suppliers are expected to designate one or more members of management staff to be responsible for assessing and monitoring compliance with the Responsible Sourcing Policy and this standard. Suppliers' commitment to comply with the requirements of our BPC which includes our Policy and standard as well as all applicable laws is a material condition of being qualified as a Supplier and to continue business with Carnival. Suppliers will be required to provide evidence of their compliance with our minimum requirements before onboarding. Carnival will regularly verify compliance with our expectations during the course of our business relationship. Our due diligence practice may include remote assessments or on-site visits.

New suppliers' authorization process

New suppliers must complete a declaration of compliance with **Carnival's Responsible Sourcing Policy** and **BPC** (or to their own policy at least consistent with the requirements of the Carnival Responsible Sourcing Policy, its associated Standards and Guidelines and our BPC) as part of our Supplier authorization process. In addition, we may require verification of compliance for certain suppliers. Failure to comply with these requirements may mean that Carnival is unable to complete the new supplier authorization process. As a result, the supplier would not be able to do business with Carnival until the issue has been resolved.

Existing suppliers' authorization process

Risk assessment

A risk assessment will be conducted to determine if a Supplier will be required to have an external audit or other forms of assessments conducted. Criteria include product category, inherent risks associated with suppliers' business activities or the nature of the contractual relationship.

Carnival is a member of [Sedex](#). We encourage our suppliers to also register with their online platform as it enables suppliers to share data and demonstrate their ethical business practices. When available, Carnival will use information provided by suppliers in [Sedex](#) to inform our risk assessment.

Verification of compliance by external audit

Selected suppliers will be required to undertake an independent external audit to verify compliance to our Responsible Sourcing Policy and this Standard. Audits are facility inspections that include employee interviews and a review of supplier records and business practices. Such audits will be conducted by Carnival's approved monitoring firm. Auditors will follow the Sedex Members Ethical Trade Audit (SMETA) protocol which includes all Carnival requirements, or a similar alternative protocol.

Suppliers are expected to cover the cost of the audit and to have a direct transactional and financial relationship with the audit company. Carnival must have access to the full audit report and supporting documentation from the audit, but Suppliers may use the output of the audit for the requirements of any of their other customers.

Audits have a validity of 1, 2 or 3 years based on the outcome of the audit. A new audit will be required prior to the expiry of the previous validity period.

Corrective action

Where an audit identifies non-compliance with our requirements, we will require the supplier to identify corrective actions and timeframes for completing those actions. The auditor will need confirmation that corrective actions have been completed for the supplier to achieve compliance. Depending upon the nature of the issue, the auditor may need to make a follow-up site visit.

Reducing auditing burden

Carnival may recognize audits carried out by internationally recognized auditing firms on Carnival approved protocols and which have been completed within the past 1-2 years (depending on risk and nature of past non-compliances).

Other assessment methodologies

Carnival is continuously reviewing the most effective approach to assess supplier compliance to our requirements. In addition to audits, we may introduce alternative verification approaches.

Consequences for violations of the Standard or applicable laws

We understand that labor and human rights issues may be a complex challenge in global supply chains and that many issues are systemic in nature and cannot be addressed alone. Consequently, we encourage Suppliers to proactively disclose to us where they are having challenges meeting this Standard, so we can work together to address issues, strengthen management systems and implement remediation solutions.

In the case of prolonged or excessive non-compliance, Carnival reserves the right to review our business with our supplier, up to and including termination of the business relationship and any related contracts.

Grievance mechanism and whistleblowing

We are committed to ensuring that workers who report violations or participate in investigations are treated fairly. Suppliers may not retaliate against their workers who report in good faith possible violations of the law, Policy and Standard to Carnival, law enforcement or government agencies or directly through the suppliers' grievance mechanism.

- Suppliers must have systems in place to enable anonymous grievance. Suppliers must respond accordingly to concerns raised, including agreeing remedies where appropriate.
- Grievance mechanisms must be continuously monitored, records maintained, and appropriate actions taken in a confidential manner. Workers must be informed of how to access grievance mechanisms.

In addition, anyone who becomes aware of any actual or potential violation by any Carnival supplier of our Policy, Standard, BPC or any applicable law, or other misconduct, should immediately report such conduct to Carnival. Suppliers, including their employees, may contact Carnival directly via either the Carnival employee with whom they have a working relationship or the Carnival Compliance Hotline "Speak up", which allows for confidential and secure reporting where permitted by law. The Carnival Compliance Hotline can be reached using the contact information detailed in our BPC.

Jon McKeown
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Carnival Corporation & plc

POLICY NAME: Responsible Sourcing Policy	LAST REVISED DATE: 05/19/2025
OWNER: Jon McKeown	VERSION: 2.0
EFFECTIVE DATE: 01/01/2025	POLICY NO: 001