

Responsible Sourcing Policy

Overview

At Carnival, our top priority is to deliver unforgettable happiness to our guests by providing extraordinary cruise vacations, while honoring the integrity of every ocean we sail, place we visit and life we touch. As the global leader in the cruise industry, our vision is to lead the way in innovative and sustainable cruising to deliver memorable vacations and build borderless connections. To achieve our vision, we work with business partners who live up to the values and standards we apply to ourselves, outlined in the Carnival [Human Rights Policy](#), the Carnival [Business Partner Code of Conduct and Ethics](#), the Carnival [Health, Environmental, Safety, Security and Sustainability Corporate Policy](#) and in our [Sustainability Goals and Aspirations](#).

This Responsible Sourcing Policy (RSP) has been developed as part of Carnival's efforts towards embedding respect for our values and sustainability commitments throughout our supply chain, setting clear expectations for our Suppliers, establishing a framework that helps us monitor compliance with our standards and raising environmental and social performance across our entire supply chain. The RSP builds on the core policies applicable to our business partners and introduces sustainability criteria for Supplier selection and evaluation to support our sustainability commitments.

Our Business Partner Code of Conduct and Ethics

The [Business Partner Code of Conduct and Ethics](#) (BPC) helps our business partners within our supply chain more fully understand and comply with our expectations for legal compliance, ethical behavior and human rights. It addresses the practices of all our business partners, including our Suppliers of goods and services, and relevant facilities involved in the production or provision of goods and services on behalf of Carnival. It is based on international standards and best practices, including the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles. The BPC outlines our expectations that **our business partners share our commitments in the areas of labor and human rights, health and safety, the environment and business conduct and ethics.**

Our Sustainability commitments

Carnival is committed to sustainability and this commitment is embedded in our business - **from ship to shore**. To achieve our sustainability ambition, including our [2030 sustainability goals and 2050 sustainability aspirations](#), we need our Suppliers to ensure sustainability is at the core of their operations and support our key sustainability programs for **climate action, circular economy, good health & well-being, sustainable tourism & animal welfare, biodiversity & conservation, and diversity, equity and inclusion.**

Our RSP

This RSP translates our BPC and our sustainability commitments **into specific principles and requirements for our Suppliers**. It is instrumental in ensuring we deliver our business objectives while making a positive social impact on the lives of people in our supply chains and reducing our environmental impact. Each principle covered in the RSP is supported by separate detailed **supplier standards or guidelines** which describe how suppliers are expected to implement these **requirements** and outline our **supply chain due diligence**. The RSP is embedded into our contract terms and conditions and serves as a compliance guideline for all new supplier contracts. This policy may be updated from time to time to reflect how we progress our responsible and sustainable journey, in line with our BPC and Sustainability commitments.

Scope

The RSP and its associated standards and guidelines apply to all suppliers managed by our global sourcing function during the launch phase. 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 in their operations and throughout their supply chains through communication, education, and verification.

Responsible Sourcing Framework

This framework sets out how we are working to create a more responsible and sustainable supply chain. It includes 3 focused programs which reflect our priority areas: **Responsible Sourcing**, **Sustainable Sourcing** and **Sustainable Product**:

The following four pillars of responsible business practice comprise our **Responsible Sourcing program**:

- **Labor and human rights**
- **Health and safety**
- **Environment**
- **Business ethics.**

Our Responsible Sourcing Program is focused on upholding the fundamental rights of workers in our supply chain and achieving **compliance** with applicable environmental, social and governance laws and regulations. These principles are fundamental to building relationships with Suppliers who share our values within their own business and across their supply chain, and to realize our responsible business ambitions.

Our **Sustainable Sourcing program** reflects our efforts to support **biodiversity, conservation and promote sustainable tourism** in alignment with our global sustainability ambition. Our Sustainable Sourcing Program is focused on making positive social and environmental impacts by partnering with our suppliers on the sustainability agenda. We aim to collaborate to support maintaining and improving the ecosystems, biodiversity and natural resources of the communities with which we interact with.

Our Sustainable Sourcing areas of focus are those for which we have the greatest opportunity for positive impact and include:

- **Sourcing food responsibly** by supporting **animal welfare** improvements.
- **Sourcing shore excursions** which uphold our values and sustainable commitments.
- **Sourcing natural raw materials** which are produced responsibly.

Our **Sustainable Product program** reflects how we are shifting our work with our Suppliers to drive **climate action** and deliver our **circular economy** commitments, while strengthening our environmental protection efforts. We expect our Suppliers to promote sustainable product ingredients and packaging that reduce waste and support decarbonization. Our Sustainable Product areas of focus are those for which we have the greatest opportunity to maximize positive impact, and include:

- **Reduction of GHG emissions**
- **Single-use plastics**

We recognize that these principles are interconnected and interdependent, therefore Suppliers need to consider them together to meet our requirements.

Responsible Sourcing Principles

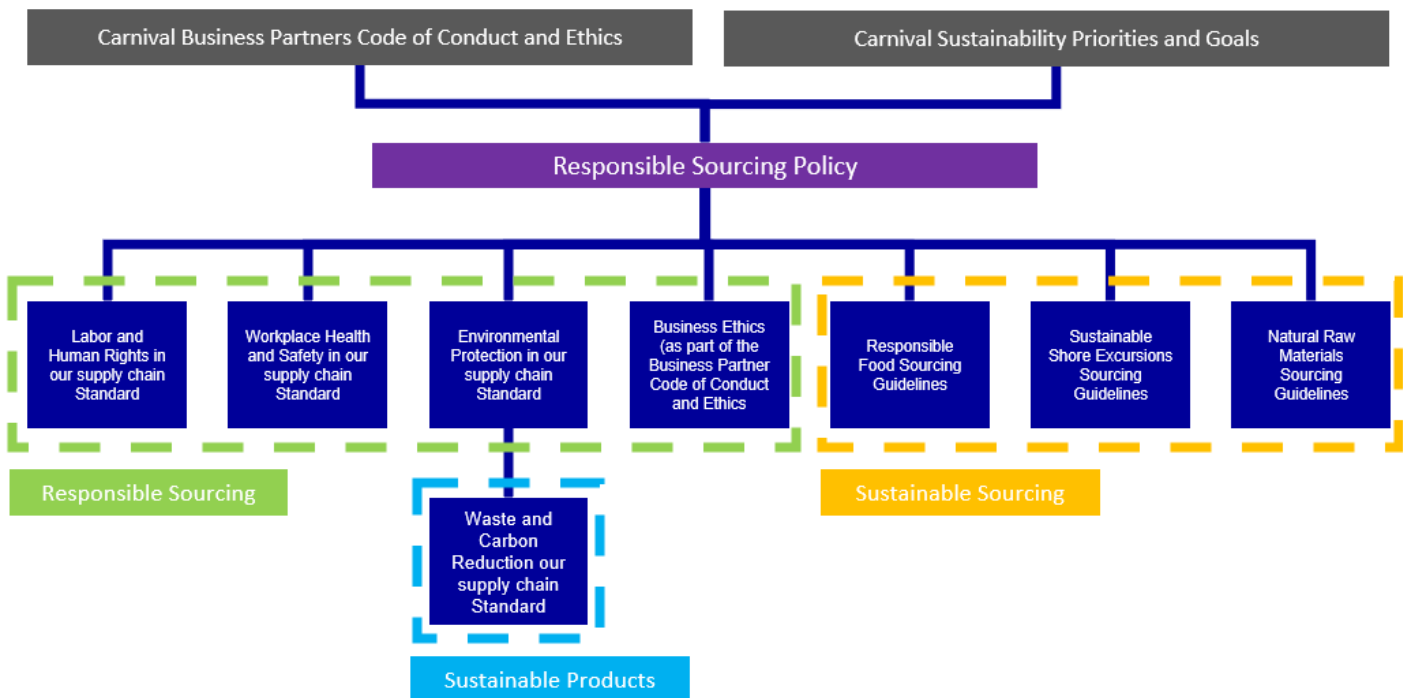
Within the above 3 focused programs, we have established **8 Responsible Sourcing Principles** (RS Principles) which outline the Carnival **overall expectations** for responsible and sustainable sourcing. We aim to have each principle covered in the RSP supported by a separate detailed **Supplier standard, guideline** or a **policy**. They outline Carnival's approach to **supply chain due diligence** and describe how suppliers are expected to implement these **requirements**.

As we navigate our journey toward a more responsible and sustainable supply chain, we are working with various stakeholders to ensure that we strive for continuous improvement. We already have in place a standard, guidelines

or a policy for 5 of the 8 RS Principles and are working towards developing our programs further. The detailed requirements supporting the remaining RS Principles will be issued as part of our road map implementation and we will continue to adjust our path as needed.

	Responsible and Sustainable Sourcing Principles		Detailed requirements
Responsible Sourcing	Principle 1	Carnival' Suppliers must ensure that labor and human rights are respected	Labor and human rights in our supply chain standard
	Principle 2	Carnival's Suppliers must provide a healthy and safe environment to workers	Workers health and safety in our supply chain standard
	Principle 3	Carnival's Suppliers must conduct business with honesty and integrity	Business Partner Code of Conduct and Ethics
	Principle 4	Carnival's Suppliers must protect the environment of workers and communities	Environmental protection in our supply chain standard
Sustainable Sourcing Principles	Principle 5	Carnival's Suppliers must supply food ingredient which are produced responsibly , supporting animal welfare	Responsible food sourcing guidelines - sustainable chicken, pork and eggs
	Principle 6	Carnival Suppliers must provide to our guests shore excursions which uphold our values and sustainable commitments	Part of our roadmap
	Principle 7	Carnival Suppliers must supply natural raw materials which are produced responsibly	Part of our roadmap
Sustainable Products	Principle 8	Carnival Suppliers must promote products with sustainable ingredients, packaging and production processes , that reduce waste and GHG emissions.	Part of our roadmap

RSP and associated standards and guidelines



Supplier requirements

Comply with all applicable laws and regulations.	<p>All Suppliers shall comply with all applicable laws and regulations, and in the absence of those laws, with applicable international standards guidelines and industry codes.</p> <ul style="list-style-type: none"> • 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 RSP and associated standards and guidelines requirements, the expectation is for these requirements to be met.
Meet the requirements set out in the RSP associated standards and guidelines, and monitor on-going compliance	<p>Suppliers shall endeavor to:</p> <ul style="list-style-type: none"> • Have in place their own code of conduct, guidelines, policies and training consistent with the relevant RS Principles, to enable them to meet or exceed the requirements set in our Standards. The Supplier code shall be at least consistent with the requirements of the Carnival Responsible Sourcing Policy, its associated standards and guidelines, and our Business Partner Code of Conduct.¹ • Operate a human rights and environmental due diligence process which is appropriate to their size and risk profile. • Use adequate due diligence that demonstrates risk-based action, prioritizing most significant impacts.

¹ Suppliers who do not yet their own policies in place are free to make use of our BPC, our RSP and its standards and guidelines, in creating their own policies tailored to the scope of work and activities that they perform. Carnival does not have a copyright on our RSP for this reason.

	<ul style="list-style-type: none"> Assign responsibility to assess and monitor compliance with the RSP and its associated standards and guidelines to a senior management representative.
Cascade our responsible and sustainable sourcing requirements through their supply chain	<p>Suppliers shall endeavor to:</p> <ul style="list-style-type: none"> Have a code of conduct or responsible sourcing policy for their own supply chain, covering responsible and sustainable sourcing principles. Have a process to communicate these requirements to their own Suppliers and monitor their compliance in adequation with the specificities of their upstream supply chain.
Respond to reporting and information requests related to responsible and sustainable practice	<ul style="list-style-type: none"> Such request may include third-party verification or certification, transparency of the non-compliance and impacts identified, and the actions taken or proposed. Carnival may also periodically assess and audit Suppliers in relation to their responsible and sustainable sourcing practice. Verification approach may include virtual or physical site assessments.

Compliance, continuous improvement, and consequences for violations of the RSP and its associated standards and guidelines or applicable laws

Suppliers' formal commitment to comply with the requirements of our RSP, its associated standards, guidelines and all applicable laws, is a **material condition of being qualified as a Supplier and to continue business with Carnival**. Suppliers will be required to confirm their acceptance of the Business Partner Code of Conduct and the RSP with a declaration of compliance at the onboarding stage (or demonstrate that they have equivalent policies in place).

Under this policy we will also reserve the right to periodically verify compliance against the policy's principles during the course of our business relationship. Carnival acknowledges that some of our Suppliers may not be able to meet all the requirements of the RSP, its standards and guidelines initially. This may be acceptable as long as the supplier can commit to implement an agreed action plan over a reasonable period of time. **We are looking for a long-term commitment to our responsible and sustainable sourcing goals, and we will work actively with Suppliers who don't currently meet our standards** to help them understand the RSP's principles and improve their capability to implement our requirements. To support the implementation of the policy's principles, we provide guidance and training focused on continuous improvement. Our objective is to make progress in partnership for a greater overall goal.

We encourage Suppliers to proactively disclose to us where they are having challenges meeting our RSP, so we can work together to address issues, strengthen management systems, and implement remediation solutions when appropriate. This ensures relevant issues are addressed and rightsholder impacted obtain access to appropriate remedy. In case of prolonged non-compliance or should a Supplier not provide appropriate support to remedy issues, Carnival reserves the right to review business with the Supplier. This is up to and including termination of the business relationship and any related contracts.

Governance

Carnival's Chief Procurement Officer with support of the **Global Sourcing Leadership Team (GSLT)** is responsible for the global distribution and monitoring of Carnival's RSP and of its associated standards and guidelines. This includes ensuring that Suppliers are aware of the RSP, standards and guidelines, monitoring non-compliance resolutions and holding Suppliers accountable to comply. The **Third-Party Compliance and Sustainability Forum** oversees the development and implementation of this policy and is composed of senior members of the GSLT, and of the Carnival Sustainability and Compliance teams.

Reporting breaches

Reporting breaches is an important part of this process. We are committed to ensuring that workers, who report violations or participate in investigations are treated fairly. Suppliers may not retaliate against who report in good faith possible violations of the law, any Carnival standards guidelines or policies, law enforcement or government agencies or directly through the suppliers' grievance mechanism.

In addition, anyone who becomes aware of any actual or potential violation by any Carnival Supplier of Carnival policies, standards or guidelines, the Business Partner Code of Conduct or any applicable law, or other misconduct, should immediately report such conduct to Carnival. Suppliers 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 Business Partner Code of Conduct.

Please email questions regarding the implementation of this policy to RSP@carnival.com.

Jon McKeown
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Carnival Corporation & plc

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