



Human Rights Policy

Our Company

Carnival Corporation Ltd. operates a portfolio of world-class cruise lines, with a fleet of more than 90 ships sailing globally. Carnival Corporation Ltd. is referred throughout this policy as the “Company,” “our,” “we,” and “us.”

Our purpose and mission 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. This policy is issued in support of the detailed principles contained in our Code of Business Conduct and Ethics (the “Code of Conduct”) [\(link\)](#) and other related policies.

Our Commitment to Human Rights

As the largest global cruise company and among the largest leisure travel companies, we have the opportunity 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 recognize 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 potential human rights risks or opportunities and align our efforts accordingly.

This policy is an expression of our commitment to promote and foster human rights in line with the principles set out in the United Nations (“UN”) Universal Declaration of Human Rights, the UN Guiding Principles (“UNGPs”) on Business and Human Rights, the Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Business Conduct, the International Bill of Human Rights, the International Labour Organization’s (“ILO”) Core Labour Standards as codified in the eight core conventions, and the UN Human Rights Council Resolution 48/13 recognizing access to a healthy environment as a fundamental human right.

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.

Our Board of Directors has overall responsibility for ensuring compliance with this policy. The leadership team at each of our cruise lines is responsible for implementing this policy at their respective cruise line and ensuring compliance, while our Global Ethics & Compliance Department monitors these efforts.

Our Culture

We are committed to living up to the highest standards of ethical behavior and integrity and recognize that it takes commitment from every one of our people to create a stronger culture that values togetherness and belonging. We have therefore created our Core Values which are the non-negotiable beliefs and behaviors 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 to help us make decisions, build relationships, solve problems, and achieve success.

We educate all employees on our expectations and commitments in relation to human rights via our Code of Conduct, which is available to our employees on our intranet sites, and publicly on our external websites, and as part of a corresponding computer-based training course for employees. All employees are introduced to the Code of Conduct during the on-boarding process, and it is regularly reinforced in communications.

Human Rights Due Diligence and Supply Chain

We are committed to conducting a structured Human Rights Due Diligence process to identify, assess, and mitigate risks across our supply chain, in alignment with the UNGPs and OECD Due Diligence Guidelines.

As a global business, we work with thousands of suppliers, vendors, distributors, consultants, agents, and 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 our Business Partners and their supply chain partners are contractually required to comply with or demonstrate that they have equivalent rigorous policies in place.

Our Business Partner Code of Conduct [\(link\)](#) sets out our expectations for 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 have established a Responsible Sourcing Policy (the “RSP”), which provides guidelines and recommendations to help Business Partners meet our requirements for compliance and make progress towards industry best practices. Under the RSP, all Business Partners are expected to respect human rights throughout every aspect of their business activities.

Each principle covered in the RSP 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 requirements into practice. The Standard on Labor and Human Rights in our RSP 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 the safety and security of the working environment, and adopting appropriate grievance mechanisms. The RSP 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 mitigation plan, or, in certain circumstances, we may suspend or responsibly terminate the business relationship and any related contracts.

Salient Human Rights Priorities

The following priorities reflect key areas where we focus our efforts to ensure the highest standards of ethical business conduct:

1. Workers' rights & labor standards

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.

- Ensuring fair wages and working conditions, including adherence to the Maritime Labour Convention (“MLC”)

We comply with the requirements of all applicable employment protection laws across our varied jurisdictions. In particular, we adhere to the MLC from the ILO. While we often exceed the minimum requirements, the MLC sets minimum international standards for working and living conditions of seafarers. As such, we ensure that working hours comply with legal limits and that our employees receive fair and competitive compensation and benefits based on relevant market rates.

- Upholding freedom of association and collective bargaining

We maintain good relationships with labor organizations and trade 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.

- Preventing forced labor and modern slavery, including enhanced scrutiny of multinational recruitment

We condemn all forms of exploitation and forced labor and are actively working to prevent any modern slavery in our supply chains. Our Transparency in Supply Chains Statement lays out our commitment and approach to preventing modern slavery and human trafficking and complying with all relevant laws.

Our teams onboard are comprised of many nationalities, so we engage global talent partners who help us to find and recruit the best people. We have worked with the same primary employment agencies for several decades in a number of countries, including Indonesia, India, Vanuatu, and the Philippines. 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.

- Providing a safe and healthy working environment in line with ILO standards

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.

2. Inclusion & belonging

We celebrate and promote inclusion and belonging, 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 that the more perspectives we have, the better the decisions we make.

- Protecting against discrimination, harassment, and abuse

We work to ensure that our workplace is free from harassment, which includes 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. Discrimination, harassment and abuse are never tolerated. Retaliation of any kind is not tolerated either, and employees are actively encouraged to speak up if they feel they have been retaliated against or if they see something wrong or that doesn't seem right, trusting their voices will be heard. Via our Business Partner Code of Conduct, we also place an obligation on our Business Partners to protect individuals by requiring they set clear expectations on inappropriate behaviors that will not be tolerated (including behaviors which might amount to any form of harassment) and to provide adequate investigation and remediation methods in the case that concerns are raised.

3. Environmental & community impact

We are committed to engaging local communities to minimize the potential for environmental and other risks.

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

Having access to a healthy environment has been formally recognized by the UN Human Rights Council as a fundamental human right. Protecting the environment is central to our mission and purpose, and we continuously seek to innovate and improve our vessels, processes, and operations, ensuring our guests can cruise in even more efficient and sustainable ways. Further information on our environmental efforts can be found in our current Sustainability Report [here on our website](#).

Grievance Mechanisms and Remediation

We recognize that our policies and programs may not prevent all adverse human rights impacts in our business operations or in our supply chains.

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 by the Global Ethics & Compliance Department, and we do not tolerate retaliation of any kind. Reports can be made through our dedicated compliance reporting hotline or via other channels, such as our Human Resources Department, Line Managers, Heads of Department, the Global Ethics & Compliance Department and the Global Legal Services Department. The compliance reporting hotline 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

We are committed to aligning our grievance mechanisms with the UNGP effectiveness criteria (legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning).

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 process through which individuals may raise concerns 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.

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 effective remedy where we find impacts directly linked to our business operations, goods, or services.

Our Future Commitments

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, alongside regular engagement with our stakeholders. We are committed to increasing visibility and transparency of human rights impacts and learnings/remediations.

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