Royal Caribbean Group

Supplier Code of Conduct

Jason Liberty
President & CEO
ROYAL CARIBBEAN GROUP

A Message from Our CEO

At Royal Caribbean Group, we work diligently to build and maintain business relationships with suppliers who share our commitment to conduct business in compliance with the law and in accordance with the highest ethical standards.

Supplier partnerships are essential to our promise to deliver the best vacation experiences, responsibly. Every one of our values and actions flows from this promise. To operate the safest ships on the seas. To protect the oceans we sail. To put people and communities first in everything we do.

Our supply chain, through a large and diverse network of suppliers, fuels everything we do. It also provides an opportunity to extend our positive impact well beyond the walls of our business. We aim to source responsibly, to protect people and the planet, and to positively impact our value chain. In making sourcing decisions, we evaluate our suppliers on quality, service, price, and their commitment to social responsibility and the environment. We also maintain a comprehensive supplier review process to ensure a shared commitment to doing business ethically.

At Royal Caribbean Group, we manage our operations with honesty, fairness, and integrity, and expect all our suppliers to do the same.

Thank you for your unwavering commitment to uphold the standards of responsible and ethical business practices outlined in our Supplier Code of Conduct.

Jason Liberty
President and CEO
Royal Caribbean Group

Responsible and Ethical Business Practices

Royal Caribbean Group and its subsidiaries and affiliates ("RCG") is committed to conducting our business in compliance with the law and in accordance with the highest ethical standards. We manage our operations with honesty, fairness, integrity, and trustworthiness and expect our Suppliers to do the same. We work diligently to build and maintain business relationships with individuals, companies or other entities which sell goods or services to RCG in a manner consistent with this Supplier Code of Conduct (the "Supplier Code").

Our Suppliers must use this Supplier Code to guide their actions and to find ways to continuously improve upon them throughout their organization. The long-term success of RCG is influenced by our joint ability to conduct business ethically and in compliance with applicable laws. Thank you for your continued commitment to these responsible and ethical business practices.

Accurate Business Records

Creating and maintaining complete and accurate business records is essential to ensuring the integrity of RCG's financial statements, running our company efficiently and effectively, and complying with applicable laws and regulations. We expect our Supplier records to reflect similar standards in compliance with accounting practices and applicable laws. We rely on our Suppliers to maintain accurate books and records and never falsify, inappropriately destroy, or misstate any information.

Anti-corruption

RCG does not engage in bribery or corruption. We never, directly or indirectly, offer, give or receive anything of value for the purpose of influencing someone to do something improper or to obtain an unfair business advantage. Payments must always be made for lawful, legitimate business purposes and must be accurately recorded in our financial books and records. We also avoid making facilitation or grease payments to any government official for purposes of expediting the performance of routine governmental actions. In support of RCG's commitment to transparent and fair business dealings, we expect our Suppliers to uphold these anti-corruption standards and comply with all applicable anti-corruption laws and regulations.

Confidential Information

Protecting RCG's confidential information, including intellectual property, trade secrets and other proprietary information, is essential to the success of our business operations. We rely on our Suppliers to safeguard and never disclose confidential information, except when disclosure is authorized by RCG's policies or required by law. Confidential information covers all non-public information, including financial data, marketing plans and strategies, customer information, sales and marketing data, production and supply costs, pricing information, and information relating to business development opportunities and new products and services.

Conflicts of Interest

RCG's business dealings with our Suppliers must be objective and impartial at all times. We must avoid conflicts of interest, including the appearance of a potential conflict. A conflict of interest can arise from any situation which places in doubt whether a transaction was negotiated objectively and at arms-length. Conflicts often occur in situations involving financial interests, outside employment, or business with family members. As our Supplier, we expect you to avoid conflicts of interest. If you identify a conflict of interest or need guidance in assessing a potential conflict, notify RCG immediately.

Data Privacy and Security

RCG respects the privacy of employee, guest and third-party personal information and is committed to safeguarding and preventing unauthorized access to, or disclosure of, such information. Not only is this the right thing to do, but it is required by privacy and data protection laws in many states and countries where we conduct business. Personal information provided by or on behalf of RCG must only be used, accessed, and disclosed as permitted under relevant agreements with RGC, and in compliance with applicable laws and regulations.

Environment

At RCG we deliver the best vacations – and we do it responsibly. We are committed to conducting our business in a sustainable manner, minimizing negative environmental impacts, and promoting awareness in our operations, the oceans we sail, and the communities in which we do business. We expect our Suppliers to exercise a similar level of commitment and comply with all applicable environmental laws and regulations; use energy and natural resources efficiently; support activities that reuse and recycle materials; and continually look for ways to minimize their environmental impact and improve their sustainability performance.

Fair Competition

RCG competes fairly in the marketplace by following the laws that protect free and fair competition and interacting in an honest, fair, and objective way with our Suppliers, guests and competitors. We do not engage in anticompetitive activities such as entering into agreements with competitors to divide markets, setting prices, restricting production, allocating customers, or otherwise restraining competition, and we rely on our Suppliers to uphold and promote these standards in compliance with applicable laws and regulations.

Gifts and Entertainment

RCG's relationship with our Suppliers is based on sound business decisions and fair dealings. Gifts and entertainment, including meals and travel, can be used responsibly to help build and maintain trusted business relationships, but if excessive or lavish can be viewed as being offered in exchange for a favor to unfairly influence a business decision. To avoid even the appearance of impropriety, gifts and entertainment involving our Suppliers are expected to be reasonable, limited, transparent, bona fide, never in the form of cash or cash equivalents, and consistent with applicable laws and RCG policies.

Global Trade

RCG is committed to conducting global trade ethically and in compliance with applicable laws and regulations. We expect our Suppliers to comply with United States and other relevant trade sanctions and export laws and regulations in connection with RCG business. We also expect our Suppliers to ensure that they, and anyone acting on their behalf, are not the target of United States or other applicable sanctions or otherwise cause RCG to violate any such requirements.

Health and Safety

RCG is committed to providing a safe, secure, and healthy environment for our guests, employees, and others who enter our ships or other company premises. We prohibit the possession, sale, distribution, or use of illegal drugs, or abuse of legal drugs or alcohol on company premises and ships. We are also committed to providing a work environment free from threats, intimidation, or acts of violence. As our Supplier, we rely on you to maintain a safe environment by implementing safety and security practices and programs that minimize security hazards and incidents. We expect our Suppliers to comply with applicable safety laws, regulations and guidelines, especially when conducting work on our ships or other company premises.

Human Rights

RCG strives to be a force for the greater good by respecting, upholding and promoting human rights. We treat everyone with dignity and respect; provide a safe and healthy work environment; provide fair compensation and benefits; respect the right to freedom of association and collective bargaining; condemn child labor and all forms of forced labor, including modern slavery and human trafficking; and do not accept discrimination based on factors such as race, sex, national origin, age, religion, disability, sexual orientation, gender identity, veteran status, or marital status. RCG endorses the principles contained within the United Nations Declaration of Human Rights and the fundamental fair labor principles recognized by the International Labor Organization. We expect our Suppliers to join us in our unwavering commitment to respecting, upholding, and promoting human rights in compliance with applicable laws and regulations.

Supplier Responsibility

Suppliers are expected to report any concerns regarding actual or potential non-compliance with this Supplier Code to RCG immediately. To seek guidance or report concerns, Suppliers may contact any of the following RCG resources:

- Supply Chain Management—Supplier relationship manager or supervisor
- Global Compliance and Ethics Group at ethics@rccl.com
- Compliance and Ethics AWARE Hotline

The RCG Compliance and Ethics AWARE Hotline provides a mechanism for confidential and anonymous reporting (if permitted by applicable local laws) of concerns or violations. The hotline is operated by a third-party provider and is available 24 hours, 7 days a week. Suppliers may contact the AWARE Hotline as follows:

- Web: rclaware.ethicspoint.com
- Phone: 888-81-AWARE (29273)

RCG prohibits retaliation against any individual who, in good faith, reports questionable behavior or non-compliance with this Supplier Code.