



CARNIVAL CORPORATION & PLC “SPEAK UP POLICY”

- 1. Purpose:** This Speak Up Policy (“the Policy”) promotes our commitment to the values set out in our Corporate Vision, Mission and Purpose, Culture Essentials (Core Values) and Company Priorities. Specifically, our Speak Up core value acknowledges our voice is our strength. Every one of us, regardless of level or role, speaks up when we have questions, comments, concerns, or new ideas. If we see something wrong or that doesn’t seem right, we say something and trust our voices will be heard without fear of retaliation.

This Policy also helps us improve our compliance with Company policies, applicable laws, and regulations by identifying instances of non-compliance. All of us should feel empowered to speak up and have open and honest conversations on any issues, nevertheless, we require that all employees speak up to report certain actual and/or perceived wrongdoing or unlawful activity, as detailed in point four below. Furthermore, we encourage reports from any other individual who acquired information in a work-related context, including but not limited to officers, directors, contractors, suppliers, consultants, former employees, trainees, persons whose work relationship is yet to begin, as well as relatives of those filing reports hereunder (collectively with employees “Relevant Persons”). Equally important, in response to issues and concerns that are raised, everyone in the Company and, especially our leaders, are committed to do a better job of listening, learning, evaluating, and developing actions plans (where appropriate).

- 2. Applicability:** The Policy is applicable to Carnival Corporation and Carnival plc, their divisions, brands, lines and controlled subsidiaries and affiliates (collectively referred to as “the Company”).
- 3. Non-Retaliation:** Anyone who submits a good faith report may do so without fear of retaliation or unfair treatment of any kind. Retaliation is when you are penalized directly due to filing a good faith report. Some examples of retaliation are being terminated, receiving a reduction in pay, hours or responsibilities that is not otherwise justified. Retaliation or unfair treatment is itself a breach of Company policies, and anyone who participates in retaliation or unfair treatment may be subject to disciplinary action up to and including termination, in accordance with applicable law. The Company shall make efforts to monitor for retaliation against those who file good faith reports. Contractual confidentiality obligations cannot be enforced against an individual to prevent them from submitting a good faith report pursuant to this Policy.
- 4. Scope of Matters Covered by this Policy (“Reportable Matters”):** Although we encourage everyone to Speak Up about any and all topics of concern, the matters listed below must be reported to the Company:

Fraudulent and corrupt activities, including, but not limited to:

- Actual or perceived cases of fraud or theft involving Company assets or personnel;
- Corrupt behavior and/or non-compliance with the Company’s Anticorruption Policy and Guidelines, including bribery; and
- Fraud or deliberate misrepresentation in booking reports, guest satisfaction reports, status reports.

Accounting and reporting issues, including, but not limited to:

- Fraud or deliberate error in the presentation, evaluation, review, audit, recording or maintaining of any financial statement or financial record of the Company;
- Non-compliance with the Company's internal accounting controls;
- Misrepresentation or false statement to or by an employee regarding a matter contained in the financial records, financial reports or audit reports of the Company; and
- Deviation from full and fair reporting of the Company's financial condition and results of operations.

Health, environmental, safety and security ("HESS") issues, including but not limited to:

- Non-compliant discharges of waste streams by vessels operated by the Company;
- Non-compliance with applicable HESS company policies, laws or regulations;
- Fraud or deliberate act which interferes or affects the shipboard or shoreside preparation, evaluation, or review of an audit of any vessel operated by the Company;
- Errors or deliberate falsifications in the shipboard or shoreside recording and maintaining of the HESS records of the Company, including improper recording of waste disposals in vessel record books;
- Criminal activities which have been committed or likely to be committed, including suspicious activities such as bomb threats, possession of illegal or prohibited substances or threats to another's health or safety; and
- Failure to follow health protocols such as those relating to COVID-19, or the excessive or inappropriate use of alcohol or drugs

Workplace issues, such as:

- Retaliation for reporting Reportable Matters or making a report of any illegal activities or policy violations (real or perceived) to the Company or other authorities;
- Harassment, including sexual harassment; and
- Illegal discrimination such as that based on sex, religion, race, national origin, sexual orientation, disability, or age.

Data privacy and information security matters including but not limited to:

- Suspected data breaches;
- Suspicious e-mails or communications; and
- Violations of privacy or data security laws, including GDPR, or privacy or data security policies including disclosure or misuse of guest or employee data.

Other unlawful activity or violation of Company policy, that has been committed or is likely to be committed including but not limited to:

- Non-compliance with the Company's Code of Business Conduct and Ethics;
- Suspected Modern Slavery activities, including Human Trafficking;
- Anti-competitive behavior and/or non-compliance with the Company's Antitrust Policy and Guidelines;
- Violations of insider trading laws and/or non-compliance with the Company's Securities Trading Policy;
- Concealment of any of the matters that are reportable under this Policy; and
- Any breach of other Company's policies and procedures not specifically listed herein.

5. Speak Up Reporting Channels for Reportable Matters: Relevant Persons may speak up regarding Reportable Matters to any of the following:

- Your ship or shore Supervisor, Department Head, or Human Resources;

- If onboard, your Captain or Environmental Officer;
- At the brands: the Compliance Officer Environmental (CO-E) or Compliance Officer, Safety, Health, Security (CO-SHS);
- The Designated Person Ashore (DPA) at their brand;
- The Global Ethics & Compliance Department;
- The European Union (EU) Whistleblowing Directive Channels (EU Brands only); or
- The 24/7 Carnival Compliance Reporting Hotline or Website

5.1 Signage Requirements Table: Unless otherwise noted with an asterisk [*] or otherwise specified, each sign must include the language specified under the "Required Text" column and at a minimum the posting locations listed below. The Responsible Person must check that the poster is in place a minimum of four times a year and confirm to the Human Resources Manager or Director onboard verbally or in writing that the poster is in place by the 1st of the months of February, May, August, and November. Old versions of physical posters must be taken down and replaced within 10 business days after the issuance of a new poster. Paper posters must be at least 297 mm x 420 mm or 11.7” x 16.5” (A3 paper dimension) in size. Electronic posters must be updated within 10 business days after the issuance of a new poster.

Sign Type	Required Text * Modifications or additional signage must be approved by the Company before posting
Speak Up	<ul style="list-style-type: none"> • AIDA Compliance Reporting Poster • CCL Compliance Reporting Poster • COSTA Compliance Reporting Poster • CUN - POC Compliance Reporting Poster • HAL Compliance Reporting Poster • PCL Compliance Reporting Poster • POA Compliance Reporting Poster • SBN Compliance Reporting Poster
Posting Locations	Responsible Person
<ul style="list-style-type: none"> • On the Bridge 	Staff Captain
<ul style="list-style-type: none"> • In the Engine Control Room • In all technical and deck workshops 	Chief Engineer
<ul style="list-style-type: none"> • On the Crew notice board • In the Crew Bar • In the Crew and Officer Mess 	Hotel General Manager or equivalent position
<ul style="list-style-type: none"> • E-Notice Board 	Environmental Officer

- 6. Process for Reportable Matters received through the Compliance Hotline:** Carnival engaged an independent, third-party company to administer the hotline. A complaint or concern can be made through the hotline via telephone or web submission.

Hotline: +1-888-290-5105
International: +1-305-406-5863
Internet portal: www.carnivalcompliance.com

Additional toll-free telephone numbers to access the Compliance Hotline have been set for the various countries where the Company operates. These numbers are posted on brand specific posters at relevant locations within Company offices and aboard ships. Matters reported through any of these channels should be forwarded to the appropriate departments who will conduct an investigation as set forth in Section 7.

Complaints or concerns may be made on an anonymous basis (without the person disclosing his or her name or identity), but it is preferable persons identify themselves to facilitate the investigation by providing contact details. All complaints or concerns should contain as many specific details as possible to allow the matter to be investigated. The Company may not be able to conduct an effective investigation if a complaint or concern contains only unspecified or broad allegations of wrongdoing and doesn't include sufficient detail. The third-party hotline administrator will generate a report and will forward the report to the appropriate representative of the Global Ethics & Compliance Department.

Upon receipt of the report, the Company will follow the procedures set out in Global HESS Policy COM-1301-A1 regarding notification of the report to the appropriate personnel for investigation.

- 7. EU Whistleblowing Directive Channels:** EU legislation requires EU based companies to have local dedicated channels in addition to the Corporate channel to report certain violations and complaints. The EU Whistleblowing Directive channels are detailed in brand specific policies published locally.
- 8. Process for Review and Investigation of All Reportable Matters Regardless of Where They Are Reported:** Confidentiality will be maintained to the fullest extent possible consistent with the need to conduct an adequate review. However, the person to whom the complaint relates will, where applicable law requires, be informed of the investigation as soon as practicable, provided such notice will not harm the investigation (for example by leading to the loss of evidence).

Reportable Matters will be reviewed and investigated as appropriate in accordance with relevant Company policies and procedures. Subject to any policies regarding investigations, the Chief Risk and Compliance Officer or their representative, may request the services of the following groups to assist in their investigation of a matter:

- Incident and Analysis Group (IAG) for HESS matters;
- Risk Advisory and Assurance Services for accounting, finance, bribery and other issues;
- The Legal and/or Human Resource departments of the operating companies for employment issues;
- IT Security;
- Brand Security and Surveillance Department; or
- Others as deemed necessary or as required by applicable policy, including external counsel (a lawyer in private practice who works outside the company).

Prompt and appropriate corrective action, when allowed by local law, will be taken when and as warranted by conducting a complete, just, and fair investigation, as well as in the judgment of the appropriate officer, department, committee or entity. This may include, where appropriate, reporting any violation to the appropriate federal, state or regulatory authorities, including judges and prosecutors. The Company will keep any person who raises a concern under this Policy informed of the steps to be taken to review the matter and the outcomes of the review, where and to the extent permitted to do so.

- 9. Reporting and Retention of Complaints and Investigations:** The Global Ethics and Compliance Department will maintain a record of all matters reported under this Policy, tracking their receipt, investigation and resolution as long as permitted under applicable laws and shall prepare a summary quarterly report for the Compliance Committees of the Company.
- 10. Training:** In support of this Policy, the Company provides regular training to employees, highlighting the importance of speaking up with concerns and for those of its employees in leadership positions on the importance of responding appropriately and effectively to complaints or reports received by them under this Policy.
- 11. Responsibility for Compliance:** The Company's Audit and Compliance Committees have overall responsibility for ensuring complaints are handled in accordance with this Policy. The Committees have delegated responsibility for daily oversight of this process to the Chief Risk and Compliance Officer. Responsibility for resolution of HESS complaints shall, however, be overseen by the HESS Committees in accordance with their Charter.