



Overview

V Cruises US, LLC and its parent companies, subsidiaries, and affiliates (“We,” “Virgin Voyages” or the “Company”) conducts its business with the highest ethical standards and expects its crew members¹ to live up to the highest standards of personal and professional integrity. This Code of Business Conduct (“Code”) identifies areas of ethical risk, helps individuals recognize and deal with ethical issues, and provides ways individuals can report unethical conduct, so that we can foster a culture of honesty and accountability. All crew members must comply with the letter and spirit of the Code. In addition, we expect all of our agents, representatives, suppliers and contractors to conduct their business with, or on behalf of, Virgin Voyages in a manner that is consistent with this Code.

No code or policy can cover every situation that may arise, so this Code is intended to serve as a source of guiding principles. If you have a question about this Code or about other Company policies, or if you need guidance on a legal or ethical matter, you are encouraged to speak directly with your immediate leader, the Legal Department or/and the People Team.

Reporting Misconduct

All crew members are responsible for adhering to the standards of the Code, for raising questions if they are in doubt about the best course of action, and for reporting possible misconduct promptly after it comes to their attention. If you are aware of a violation or possible violation of the law, this Code, or other Company policies, report it promptly to your immediate leader. If your concerns relate to your leader, your leader has not taken appropriate action in response to your report, or you feel uncomfortable making the report to your leader for some other reason, direct your report to a member of the People Team.

Reports of potential misconduct may be made anonymously and confidentially through a third-party platform called EthicsPoint. Reports may be made by calling (833) 620-6812 or virginvoyages.ethicspoint.com, although individuals are encouraged to identify themselves to facilitate follow-up and investigation. Every effort will be made to protect the reporting individual’s identity. In some instances, however, it may be impossible to keep the person’s identity confidential because of the demands of conducting a thorough investigation or due to legal requirements.

Virgin Voyages prohibits any form of retaliation for raising concerns or reporting possible misconduct in good faith. No crew member will be subject to discrimination, harassment, or retaliation of any kind for reporting misconduct the crew member believes in good faith to be in violation of the Code, other Company policy, or applicable law.

Compliance with Laws

It is the Company’s policy to comply with all applicable laws, rules, regulations, and Company policies. It is the personal responsibility of crew members to adhere honestly and in good faith to the standards and

¹ “Crew member” or “crew members” as used in this Code shall mean employees of Virgin Voyages (as defined above).



restrictions imposed by the laws, rules, and regulations of the countries in which the Company operates. Although no crew member is expected to know the details of all these laws, rules, and regulations, it is important for crew members to have a general understanding of the specific laws, rules, and regulations relevant to their areas of responsibility at the Company. Contact a member of the Legal Department if you have questions about particular legal requirements or what the law permits.

Environmental

We believe in operating our business in a way that preserves the natural environment and complies with all related laws and regulations. We work hard to operate in a sustainable manner and to mitigate any adverse effects on the environment that can be caused by our operations. In doing so, we seek to prevent waste of precious resources and make the most of those we use. Crew members are expected to know the environmental requirements that apply to their jobs and follow all appropriate environmental laws, regulations, and permit requirements.

International Business

The Company is committed to complying with anti-bribery laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), in all locations where the Company operates. The FCPA prohibits companies and their subsidiaries, employees, representatives, and agents from engaging in corruption by offering anything of value to a foreign government official in order to gain an unfair business advantage. No crew member, either directly or through another person or entity, may make payments to or otherwise reward foreign government officials to obtain business, to avoid losing business, or to obtain an improper business advantage. Improper business advantages include, but are not limited to, improperly obtaining favorable treatment for regulatory, tax, or environmental matters or improperly seeking to have a foreign government official direct business to a client. Crew members who conduct business abroad must comply with the FCPA and Company policy and acknowledge compliance on an annual basis.

Please see the Virgin Voyages' Foreign Corrupt Practices Act Anti-Corruption Policy for more information.

In addition, crew members may not engage in or support a restrictive trade practices or boycotts imposed by a foreign country. If you become involved in any geographic area currently engaging in economic boycotts, embargoes, and exporting, consult a member of the Legal Department.

Competition

The Company may be subject to the competition laws of the jurisdictions in which it operates. Although these laws vary from country to country, they have the common objective of ensuring that free competition can function effectively. Crew members must strictly comply with applicable competition laws and regulations and must refrain from any practices that have the purpose or effect of restricting or eliminating free-market competition, including but not limited to improperly sharing confidential or strategic information or forming illegal agreements or arrangements with competitors. In addition to the above, crew members must compete fairly and, thus, any information crew members obtain about our competitors must be gathered



through ethical and legal means. Crew members must respect the confidential information and trade secrets of others, including former employers, and shall not under any circumstances copy, reproduce, use, or disclose any such information in connection with their work for the Company. If you believe any crew member has engaged in activities in contravention of this section of the Code, you must immediately consult the Legal Department or the People Team.

Health & Safety

The Company is committed to providing crew members with a safe place to work. The health and safety of all crew members is of utmost importance. Crew members are encouraged to report any unsafe situation to their immediate leaders as soon as possible. Any accident or injury, no matter how slight, should be reported. Furthermore, violence and threatening behavior are not permitted, and crew members are not permitted to use alcohol and illegal drugs while they are on duty.

Fair Dealing

The Company strives to maintain the highest level of integrity and ethical conduct in its dealings with its crew members, customers, suppliers, competitors, local communities, and other third parties. Crew members are responsible for the integrity and consequences of their actions and are required to deal honestly, ethically, and fairly at all times with each other and with persons outside of the Company. Crew members should not take unfair advantage of anyone through manipulation, exaggeration, concealment, misrepresentation of facts, abuse of confidential or privileged information, or similar practices.

Equal Employment and Working Conditions

The Company is committed to providing equal opportunity in all aspects of employment and does not tolerate illegal discrimination, harassment, bullying or retaliation of any kind. All employment practices and decisions, including those involving recruiting, hiring, transfers, promotions, training, compensation, benefits, discipline, and termination, must be conducted without regard to age, sex, race, color, ancestry, religion, creed, citizenship status, disability, national origin, marital status, military status, sexual orientation, gender identity, or any protected status or activity, and must comply with all applicable laws. The Company will provide reasonable accommodation for disability and religion as required by law.

Crew members should report any incident of discrimination or harassment to their immediate leader, or to any members of the People Team they deem appropriate or with whom they feel comfortable.

Voyage Vacation Program and Access Keys Guidelines

The Company's Voyage Vacation Program (or VVP) is a perk available to eligible crew members year-round, providing our crew members or their families and friends the opportunity to enjoy sailing on any of our lady ships at discounted rates. The Company also offers Access Keys as an additional perk to all eligible crew members for select voyages during certain time periods. These epic perks come with epic expectations and responsibilities. Please read below for the guidelines that govern all crew members, their families and friends while sailing under our VVP or on an Access Key.

- All crew members, their family and friends will be subject to the terms and conditions of Virgin Voyages' Guest Ticket Contract as well as the Sailor Code of Conduct.



- All crew members are responsible for, and will be held accountable for, the actions of their families and friends sailing under our VVP or on an Access Key. This applies whether or not the crew member is sailing with their families or friends.
- Crew members should only give Access Keys to people they personally know e.g. friends and family, as they will be accountable for the behavior of those that sail on their Access Key.
- Crew members will not have access to crew areas when sailing as a sailor under our VVP or on an Access Key.
- Any crew members, their family, or friends may be denied service of alcohol where they exhibit signs of intoxication or unruly, abusive, or aggressive behavior toward others.
- In accordance with the Guest Ticket Contract, the Master, in his or her sole discretion, may disembark at any port any crew members, their families and/or friends while sailing under our VVP or on an Access Key. This includes any crew members, their families, or friends who bring onboard dangerous items, marijuana in any form, or any illegal drugs or unprescribed controlled substances.
- Should a crew member be dismissed or leave the company on bad terms, Access Keys will no longer be valid and future sailings booked will be canceled and refunded.

Although crew members may be sailing as a guest under a VVP or an Access Key, the Company nevertheless expects crew members to act in accordance with the Company's Creeds and this Code - at all times. Failure to abide by these guidelines may result in the loss of crew perks and/or disciplinary action, up to and including termination. By acknowledging this form, crew members recognize that they have read and understood these guidelines and that they will abide by them.

Conflicts of Interest

A conflict of interest may arise when a crew member's own actions or interests interfere or appear to interfere with the interests of the Company. This includes the interests of an immediate family member or organizations with which a crew member, or an immediate family member, has a significant relationship. Conflicts of interest may also arise when a crew member, or a member of his or her immediate family, receives improper personal benefits as a result of a crew member's position in the Company.

Examples of situations that may present conflicts of interest include:

- Outside employment;
- Providing goods or services to a competitor or business partner of the Company;
- Having a financial interest in a competitor, a partner or an outside supplier or vendor that provides goods or services to the Company; and
- Pursuing business opportunities that are discovered through the use of Company property, Company information, or through the crew member's position with the Company

Crew members should report any conflicts of interest or potential conflicts of interest to the Legal Department or the People Team. It is sometimes difficult to determine whether a conflict of interest



exists, so you are encouraged to consult with the Sr. Director of Legal Department or the Sr. Director of People & Culture prior to taking any action that you suspect might result in a conflict of interest.

Outside Employment and Services

Crew members may not accept another position or perform services (such as memberships on a board of directors) that interfere with their jobs with the Company. A conflict of interest exists when outside employment in, or services performed for, another company:

- a) involve a direct competitor of Virgin Voyages
- b) adversely impact the name and reputation of Virgin Voyages
- c) affect a crew member's objectivity in performing their duties
- d) involve the use, possible use, or disclosure of proprietary, confidential, or non-public information of Virgin Voyages
- e) implies in any manner sponsorship by Virgin Voyages of the outside employer
- f) creates an appearance of impropriety

Financial interest in competitors, customers, or vendors

Crew members may not invest in, or have a business relationship with a competitor, customer or vendor which creates (or could create) divided loyalty or that creates an appearance of impropriety. Any such relationships must be disclosed to the company's People Team and Legal Department for approval. However, the ownership of less than 1% voting control of a publicly traded company will not be deemed a "substantial investment" that constitutes a potential conflict of interest or requires Company approval.

Acceptance of Gifts and Gratuities

Crew members may accept only gifts, meals or entertainment from vendors that are of nominal value and that are intended solely to build goodwill and foster a sound working relationship. Crew members are expected to use common sense and good judgment in accepting gifts and may under no circumstances accept cash or money in any form, including, but limited to gift cards, from vendors. Crew members should seek guidance from the Legal Department in the event that a gift may conflict with this Policy or may create an appearance of impropriety.

Giving gifts to Third Parties

Crew members may not provide any gift, payment, or loan, or grant any unreasonable favor on behalf of Virgin Voyages to customers, suppliers, competitors or government officials (or their agents or family members), to induce them to compromise their duties, or which could be construed as for the purpose of so inducing or rewarding them for compromising their duties. Favors or gifts on a nominal value (i.e., \$50 or less) which do not exceed normal standards of ethical business conduct, and casual entertainment for business purposes are permissible. Notwithstanding the foregoing, any and all gifts that are intended to be made to government officials, including, but not limited to gifts of nominal value, must conform to, and be approved, in accordance with the requirements of Virgin Voyages' Foreign Corrupt Practices Act Anti-Corruption Policy.



Relationships

Consensual romantic and/or sexual relationships between crew members are prohibited where one of the parties to such a relationship is either a supervisor over the other or has the ability to impact the advancement of the other within the Company. In the event that any such relationship takes place, the crew members at issue are expected to disclose the matter to the Vice President, People so that any necessary arrangements may be made to avoid a conflict of interest.

Company Assets, Confidential and Intellectual Property

Virgin Voyages' assets, confidential information and intellectual property all play a vital role in our ability to compete and perform. Our physical assets include equipment, technologies, facilities, funds, and any other tangible property we use as part of our work. All of us use these resources on a daily basis, and must therefore protect them from damage, theft, waste, and misuse. Virgin Voyages' intangible assets are just as important. Confidential information and intellectual property guide our innovation and serve to give us a competitive advantage. Our confidential information is non-public information that could harm our Company and benefit our competitors, if disclosed. Confidential information includes, but is not limited to, the following: business strategies and concepts; designs; budgets and other financial information; operational and technological information; corporate organizational information; customer, vendor and pricing information; technical data and processes; and marketing sales strategies and forecasts, and strategic plans.

Confidential information must be protected at all times. Virgin Voyages' crew members are therefore expected to avoid discussing or accessing confidential information in public places, where others may be able to gain access to it by hearing it or seeing it. Never leave confidential information, or devices containing such information, unattended. We must also keep our devices password protected and secured in order to prevent unauthorized parties from gaining access to our confidential information and must comply at all times with established IT policies pertaining to data protection and device security, including, but not limited to the Virgin Voyages' Data Protection Policy. In addition, we must avoid sharing confidential information with third parties—or even fellow crew members who do not have a business need to know it. If a vendor, business partner, or fellow crew member asks you for confidential information and you are uncertain as to whether it may be disclosed, make certain to contact a member of the Legal Department prior to disclosure in order to be certain that the information may be disclosed.

Similarly, intellectual property ("IP") is another important intangible asset to Virgin Voyages. IP includes, but is not limited to Virgin Voyages' patents, trademarks, copyrights, trade secrets, design rights, inventions, systems, processes, and logos. IP is protected by law, just like physical forms of property. If you use or create IP during the course of your work, you have a responsibility to keep that information safe. The rights to all IP created with Virgin Voyages' materials, on Company time, at Virgin Voyages' expense, or within the scope of your job at Virgin Voyages, belong to the Company. If you need to use third party IP, you may do so only to the extent that the law allows, or if you have express permission to do so.



Company Information Systems

Virgin Voyages provides crew members with access to, and use of, computer hardware devices, software, cellular phones, applications, databases, networks, email, internet resources and underlying similar technology (“Electronic Systems”) in order to assist each crew member in carrying out their respective job function. Crew members may only access the Electronic Systems, documents or messages using their assigned username and password. Incidental and occasional personal use is permitted, but never for personal gain or any improper purpose, including accessing, downloading, storing, or sending any information that could reasonably be insulting or offensive to another person, such as sexually explicit messages, cartoons, jokes, unwelcome propositions, derogatory comments based on gender, religious, sexual orientation, racial or ethnic characteristics, or any other message that could reasonably be viewed as harassment. Flooding the Company’s system with spam, junk, or trivia email hampers the ability of the Company’s system to handle legitimate company business and is prohibited.

In addition, in order to avoid unnecessary exposure to the Company, Virgin Voyages requires that crew members immediately forward to the Legal Department any unsolicited e-mails sent by outside parties that contain ideas, concepts, or pitches for purported use by Virgin Voyages. Any attachments to any such unsolicited e-mails must not be opened, downloaded, or saved by Virgin Voyages’ crew members. Upon being forwarded the unsolicited e-mail, the Legal Department will provide an appropriate response to the third party.

Electronic documents and messages (including voicemail, email and SMS) sent, received, created or modified by crew members on Virgin Voyages’ Electronic Systems are considered company property and are not “personal” or “private.” Unless prohibited by law, the Company reserves the right to access and disclose (both internally and externally) electronic documents and messages, as well as, to specify, configure and restrict its Electronic Systems as necessary for its business purposes. Crew members should use good judgment and not access, send messages, or store any information that they would not want to be seen or heard by others. Upon separation from the Company, all crew members must return any Electronic Systems that were provided to them by the Company.

All Virgin Voyages crew members are expected to comply with the above requirements pertaining to the use of Electronic Systems and, to the extent that any Virgin Voyages’ crew members have been authorized to bring their own electronic devices in order to perform their respective functions, each such crew member must ensure that they are also in compliance with the Virgin Voyages policies with regard to the same.

Accurate Records

We require honest and accurate recording and reporting of information in order to make responsible business decisions and to comply with applicable laws. Virgin Voyages’ accounting records are relied upon to produce reports for management, directors, shareholders, governmental agencies, and persons with whom the Company does business. All of the Virgin Voyages’ financial statements and the books, records and accounts on which they are based must appropriately reflect the Company’s activities and conform to applicable legal and accounting requirements and to the Company’s system of internal controls.



Unrecorded or “off the books” funds or assets are not authorized and should not be maintained unless required by applicable law or regulation.

We have a responsibility, within the scope of our positions, to ensure that Virgin Voyages’ accounting records do not contain any false or intentionally misleading entries. Virgin Voyages does not permit intentional misclassification of transactions as to accounts, departments, or accounting records. All transactions must be supported by accurate documentation in reasonable detail and recorded in the proper accounts and in the proper accounting period. If you become aware of inaccuracies or irregularities pertaining to financial reporting, please address the matter by contacting the a member of the Company’s Legal Department or following the procedure set forth above in the section entitled “Reporting Misconduct”.

Investigation and Appropriate Action

We investigate all ethics complaints and concerns and take appropriate action. It is important that reporting persons not conduct their own preliminary investigations. Investigations can involve complex legal issues and acting on your own may compromise an investigation and could adversely affect both you and the Company. Crew members who do not comply with this Code, or with other Company policies and procedures, may be disciplined up to and including termination of employment. Violations of the standards outlined in this Code may also result in criminal penalties or civil liabilities, or both.

Amendments

This Code may be amended from time to time. Notwithstanding any such amendments, all crew members are charged with making certain that they are at all times in compliance with the Code.

Certifications

All new and existing crew members are required to sign a certification stating that they have received a copy of the Code, that they will comply with all provisions of the Code, and that they will report all violations of the Code of which they become aware, in accordance with the reporting procedures contained herein.

No Rights Created by the Code

The Code is a statement of policies for individual and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment. Nothing in this Code affects the status of Virgin Voyages’ employees as at-will employees. It is not intended to and does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity.