

# Compliance and Ethics

Working with integrity is a cornerstone of how we do business.

## Living our Code

Operating in a principled and ethical manner is not only the right thing to do, it is the smart thing to do. Our Code of Business Conduct and Ethics is the roadmap and compass for conducting our global operations ethically and in accordance with the law. We evaluate and refresh it every year.

Oversight of the Compliance & Ethics Program rests with Royal Caribbean Group’s Board of Directors through the Board’s Audit Committee and senior management through Royal Caribbean Group’s Compliance & Ethics Committee. This committee includes cross-departmental membership from Global Compliance and Ethics, Legal, Audit and Advisory Services, Global Security, Information Technology, Sales, Operations, and Human Resources.



We have been recognized as one of the World’s Most Ethical Companies by the Ethisphere Institute seven years in a row.

**24/7**

We maintain a third-party 24/7 hotline called AWARE for employees to report known or suspected unethical activities anonymously by phone or online.

**100%**

Our goal is for 100% of our shoreside and shipboard workforce to complete ethics compliance training annually.

## Discouraging Bribery and Corruption

Royal Caribbean Group’s anti-corruption program is anchored by risk-based company controls, including:



**Training:** Certain identified employees are required to complete targeted anti-bribery training.



**Due diligence and invoice reviews and approvals:** Certain suppliers and business partners undergo heightened due diligence procedures. In addition, our invoice and review process includes detailed reviews of line items against government-issued tariffs, fee schedules, and contractual rates to verify the legitimacy and accuracy of transactions.



**Contractual provisions:** Our contractual agreements include provisions that set our expectations and requirements for compliance. Generally, contracts contain anti-bribery, audit, books and records, and termination clauses if the vendor is found not to be in compliance. We also require the maintenance of accurate books and records.



**Risk assessments:** We undertake an annual assessment of global operations includes interviews, evaluations of high-risk areas, internal control reviews, and analyses of legal and regulatory trends.



We work closely with Trace International, a leading organization with a mission to advance commercial transparency.

## Respecting Human Rights

We recognize and embrace our responsibility to respect, uphold, and promote internationally recognized human rights standards. Our respect for human rights is enshrined in our [Code of Business Conduct and Ethics](#), which is underpinned by a robust suite of corporate policies and procedures.

- [Human Rights Statement](#)
- [Supplier Guiding Principles](#)
- [AWARE Compliance and Ethics Hotline](#)
- [Modern Slavery Statement](#)