

Ethics and Compliance

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, but also the smart thing to do. We are committed to conducting our operations with the highest standards of ethical behavior and in accordance with the law wherever we do business. Our <u>Code of Business Conduct and Ethics</u> guides us on our journey by setting forth the standards we expect of all Royal Caribbean Group employees, officers and members of our Board. We evaluate and refresh the Code every year.

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

8 YEARS IN A ROW

In 2023, we were recognized as one of the World's Most Ethical Companies by the Ethisphere Institute for the eighth year in a row.



24/7

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

100%

All employees, both shoreside and shipboard, are expected to take mandatory training on our Code when hired and annually thereafter.



Prohibiting 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 in compliance. We also require the maintenance of accurate books and records.

Risk assessments: We undertake periodic assessments of global operations that include interviews, evaluations of high-risk areas, internal control reviews, and analyses of legal and regulatory trends.

Respecting Human Rights

We recognize and embrace our responsibility to respect, uphold and promote internationally recognized human rights standards, including the principles contained within the United Nations Declaration of Human Rights and the International Labor Organization. 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



We are an active member of TRACE International, a leading organization with a mission to advance commercial transparency worldwide.

