

SUPPLIER CODE OF CONDUCT

Norwegian Cruise Line Holdings Ltd. (including its brands and subsidiaries, “NCLH”) sets high ethical standards for its employees, officers and directors and expects its vendors, suppliers, contractors, agents and others who do business with NCLH (“Suppliers”) to share NCLH’s commitment to operating responsibly. NCLH has developed this Supplier Code of Conduct (“Code”) to clarify its expectations for its Suppliers and NCLH’s Suppliers are required to comply with this Code. A violation of this Code, subject to any other applicable contractual terms, may result in immediate termination as an NCLH Supplier. This Code is not exhaustive and there may be other conduct that is considered unacceptable for NCLH’s Suppliers. Suppliers agree that the requirements of the Code also apply to any subcontractors they may use in the performance of their contract with NCLH.

LEGAL, REGULATORY COMPLIANCE AND ETHICS

Trade

Suppliers will comply with applicable trade control and trade sanction laws and regulations as well as all applicable export and import requirements.

Anti-Corruption

Suppliers will not offer, authorize, give, promise or accept bribes or kickbacks to obtain or retain business or to obtain any undue or improper advantages. Suppliers will not violate the Foreign Corrupt Practices Act, the UK Bribery Act or other applicable anti-corruption laws and regulations or anti-money laundering laws in the countries in which they operate and will not engage in corruption, extortion or embezzlement in any form.

Antitrust

Suppliers will comply with applicable antitrust and fair competition laws.

Insider Trading

Suppliers will not buy or sell NCLH’s securities while in possession of information about NCLH that is not generally available to the investing public and that could influence an investor’s decision to buy or sell NCLH’s securities.

Conflicts of Interest

Suppliers are prohibited from providing or offering gifts to NCLH employees that could inappropriately influence NCLH's business decisions or cause the Supplier to gain an unfair advantage. Suppliers will not negotiate directly with NCLH employees who hold or whose immediate family members hold significant financial interests in the Supplier or with a Supplier employee's immediate family member who is employed by NCLH. Suppliers will avoid potential and actual conflicts of interest and will notify NCLH if any potential conflict exists or develops during the course of the business relationship.

Business Records

Suppliers will maintain accurate books and records in accordance with applicable legal and regulatory requirements and accepted accounting practices.

Confidential Information, Physical and Intellectual Property

Suppliers will protect NCLH's confidential information and trade secrets. Suppliers will protect and responsibly use NCLH's physical and intellectual property if authorized to use such property by NCLH.

Press

Suppliers will not speak to the press or public on behalf of NCLH unless expressly authorized in writing to do so by NCLH.

Data Privacy and Information Security

Suppliers will comply with applicable data privacy and protection laws and regulations and will notify NCLH of any actual or threatened data breaches that involve NCLH, its guests, prospects, employees or other Suppliers upon discovery. Suppliers will comply with contractual requirements regarding privacy and information security and will protect personal data about NCLH's guests, prospects, employees or other Suppliers.

Inclusive Supply Chain

Specifically in the United States, Suppliers are expected to provide minority-, women-, LGBTQ+-, disabled-, and veteran-owned businesses, small businesses and local businesses an opportunity to participate in the subcontracts they award to the extent consistent with the Supplier's performance under any agreement with NCLH.

EMPLOYMENT PRACTICES

Human Rights

Suppliers will comply with all applicable employment laws and acknowledge NCLH's respect for human rights.

Child Labor

Suppliers will comply with all local and national minimum working age laws and regulations and will not use child labor.

Forced Labor

Suppliers will not use any form of forced or compulsory labor. The use of indentured labor, bonded labor, prison labor, or involuntary labor through threat, force, fraudulent claims, other coercion or any other form of human trafficking is strictly prohibited.

Harassment and Discrimination

Suppliers will maintain a work environment that is free from harassment and unlawful discrimination based on race, color, national origin, religion, age, mental or physical disability, gender, marital status, pregnancy, sexual orientation, union membership, political affiliation or veteran status.

Health and Safety

Suppliers will provide a safe and healthy work environment and will comply with applicable safety and health laws and regulations. Suppliers will take precautions and implement procedures to mitigate health and safety risks.

Wages and Working Hours

Suppliers will comply with applicable laws governing wages and working hours and provide all legally mandated benefits.

Freedom of Association

Suppliers will respect employee rights to freedom of association and collective bargaining, consistent with applicable law.

ENVIRONMENT

NCLH is committed to operating responsibly and aligning its long-term business objectives with its commitment to environmental protection.

Environmental Compliance

Suppliers will comply with all applicable environmental laws and regulations.

Environmental Management

Suppliers commit to monitoring and minimizing impacts on the environment from their operations.

COMPLIANCE WITH THE CODE

Suppliers are required to educate and train their employees on the obligations in this Code. As a condition to maintaining a business relationship with NCLH, Suppliers will periodically be asked to acknowledge their obligation to comply with the Code. NCLH may conduct reasonable audits to verify a Supplier's compliance with the Code.

REPORT SUSPECTED VIOLATIONS OF THIS CODE

A Supplier's employees or contractors are encouraged to report suspected violations of this Code to NCLH's reporting hotline at 1-800-884-1217 or to dedicated toll-free international numbers for countries throughout the world. A list of international numbers is available at <https://www.nclhld.com/investors/corporate-governance/the-reporting-hotline>.

The hotline is available 24 hours a day, 7 days a week. Reports may also be made electronically via the web at <https://secure.ethicspoint.com/domain/media/en/gui/59298/index.html>.

Last Update: May 3, 2022

Acknowledged and Agreed:

By:

Supplier: _____

Signature: _____

Name: _____

Title: _____

Date: _____