

## Independent Assurance Statement

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### Introduction

**DNV Business Assurance USA, Inc. (DNV)** has been commissioned by the management of The Norwegian Cruise Lines Holdings (NCLH) to carry out independent verification of its 2021 environmental and social diversity assertions related to waste and wastewater. These assertions are relevant to the 2021 calendar year.

NCLH has sole responsibility for the preparation of the data and external reports. DNV, in performing our assurance work, is responsible for the management of NCLH. Our assurance statement, however, represents our independent opinion and is intended to inform all stakeholders including NCLH.

### Scope of Assurance

The scope of work agreed with NCLH includes the following:

- Water usage on vessels
- Water withdrawal by Source
- Percentage of fleet implementing ballast water exchange and ballast water treatment
- Number of notices of violations received for dumping
- Amount of ship waste discharged to the environment
- Gender Diversity and Ethnic diversity

### Level of Assurance

We performed a limited assurance engagement in accordance with the *International Standard on Assurance Engagements (ISAE) 3000 revised – Assurance Engagements other than Audits and Reviews of Historical Financial Information*, issued by the International Auditing and Assurance Standards Board. This standard requires that we comply with ethical requirements and plan and perform the assurance engagement to obtain limited assurance.

DNV applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17021-1:2015 - Conformity Assessment Requirements for bodies providing audit and certification of management systems, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

The procedures performed in a limited assurance engagement vary in nature and timing, and are less detailed than those undertaken during a reasonable assurance engagement; therefore, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. We planned and performed our work to obtain the evidence we considered sufficient to provide a basis for our opinion, so that the risk of this conclusion being in error is reduced, but not eliminated completely.

DNV's assurance engagements are based on the assumption that the data and information provided by the client to us as part of our review have been provided in good faith. This includes but is not limited to sales and acquisitions, square footage, data coverage, and operational control. DNV expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Independent Assurance Statement.

## Assurance Team

Role	Name
Project Manager	Shruthi Poonacha
Lead Verifier	Kyle Silon
Technical Reviewer	Weidong Yang

## Assurance Methodology

DNV is a leading provider of sustainability services, including verification of GHG emissions data and other environmental metrics. Our environmental and social assurance specialists work in over 100 countries.

In that respect, the environmental footprint inventories have been evaluated against the following reporting criteria:

- World Business Council for Sustainable Development (WBCSD) / World Resources Institute (WRI) Greenhouse Gas Protocol, Corporate Accounting Standard REVISED EDITION
- Sustainability Accounting Standards Board, Cruise lines: Sustainability Accounting Standard, Industry Standard, Version 2018-10

DNV used a risk-based approach throughout the assurance engagement, concentrating on the areas that we believe are most material for both NCLH and its stakeholders. DNV applied a materiality threshold of five percent for Water Consumption. DNV applied International Standards Organization (ISO) guidance for determining the sample size.

The following methods were applied during the assurance of NCLH's environmental impact and management processes, the data that supports the company's environmental and social inventories including assertions and claims presented by the company:

- Review of documentation, data records, and sources relating to the corporate environmental and social data claims;
- Review of the processes and tools used to collect, aggregate, and report on all environmental and social data and metrics;
- Interview managers and data users representing relevant functions for supporting the environmental inventory management process;
- Assessment of environmental information systems and controls, including:
- Selection and management of all relevant environmental and social data and information;
  - o Processes for collecting, processing, consolidating, and reporting the environmental and social data and information;
  - o Systems and processes that ensure the accuracy of the environmental and social data and information;
  - o Design and maintenance of the environmental and social information system;
  - o Systems and processes that support the environmental and social information system;
- Performance of sample-based audits of the processes for generating, gathering, and managing the data;
- Examination of the environmental data and information to develop evidence for the assessment of the environmental and social claims and assertions made;
- Evaluation of whether the organization conforms to the reporting criteria;
- Evaluation of whether the evidence and data are sufficient and support NCLH's environmental and social claims.

## Data Verified

The environmental and social assertions for NCLH are as follows:

### Environment

- 2021 Water usage on vessels 1,913,012 m<sup>3</sup>
- 2021 Water withdrawal by Source
  - Reverse Osmosis 826,824 m<sup>3</sup>
  - Evaporators 711,657 m<sup>3</sup>
  - Bunkered 373,564 m<sup>3</sup>
- 2021 Percentage of fleet implementing:
  - ballast water exchange 96.4 %
  - ballast water treatment 3.6 %
- 2021 Ship waste discharged to the environment
  - Total amount discharged 1,741,617 m<sup>3</sup>
  - % Treated prior to discharge 81 %
- 2021 Number of notices of violations received for dumping
  - NCLH received 1 warning in 2021 related to dumping. The event resulted in less than 5 ml's of hydraulic oil released into the environment.

### Social: Diversity

Gender diversity	Male %	Female %
All shoreside team members	41%	59%
Shoreside Managers/above	52%	48%
All shipboard team members	78%	22%
3-stripe/above (equivalent to Manager level)	86%	14%
Ethnic diversity	Non-URMs %	URMs <sup>1</sup> %
All shoreside team members in the U.S. who have self-identified	36%	64%
Shoreside Managers/above in the U.S. who have self-identified	51%	49%

## Assurance Opinion

Based on the processes and procedures conducted with limited assurance, there is no evidence that the environmental and social claims and assertions listed are not materially correct and are not a fair representation of environmental and social data and information, and have not been prepared in accordance with the reporting criteria referenced above.

## Independence

DNV was not involved in the preparation of any part of NCLH's data or report. We adopt a balanced approach toward all stakeholders when performing our evaluation.

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<sup>1</sup> Under-represented minority ("URM") is used to describe diverse populations, including Native American, Asian, Black, Hispanic/Latino and Native Hawaiian team members in the U.S.

DNV Business Assurance USA, Inc.  
Oakland, California  
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Lead Verifier  
**Kyle Silon**



Technical Reviewer  
**Weidong Yang**



Approver  
**David Tellez**  
Regional Manager Supply Chain &  
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