

TCFD REPORT

2021 TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

At Norwegian Cruise Line Holdings Ltd. (the “Company”), we are committed to driving a positive impact on society and the environment while delivering on our vision to be the vacation of choice for everyone around the world. Because offering our guests the opportunity to explore nearly 500 destinations globally is at the heart of what we do, the preservation and protection of our planet is critical to our success.

In 2021, we worked with a third-party sustainability consultant to conduct a comprehensive materiality assessment, which identified and prioritized 14 material environmental, social and governance (“ESG”) topics, by aligning the views of both external and internal stakeholders. Greenhouse gas (“GHG”) and climate risk were identified as strategic material priorities to our Company and our stakeholders.

Our global sustainability program, Sail & Sustain, is informed by this materiality assessment, and was developed with the commitment to create value for all of our stakeholders. This commitment includes providing greater disclosures and transparency to our stakeholders. To expand and refine our climate risk disclosures, we adopted the Task Force on Climate-related Financial Disclosures (“TCFD”) recommendations, which focuses on climate as it relates to governance, strategy, risk management and metrics and targets. The findings in this report combine results from a qualitative and quantitative assessment of our Company’s transition and physical climate risks. Through this assessment, we’re able to further align our risk management and strategic planning processes with the evolving challenges of climate change, driving innovations that build our resilience and position the Company to create positive climate impact.

GOVERNANCE

Climate-related risks and resiliency are managed at multiple levels throughout the organization, starting from the Board of Directors (“Board”) who oversees all significant risks, and the CEO & President who has the ultimate responsibility of the Company’s climate action strategy.

While the full Board regularly monitors the Company’s progress on sustainability, the Technology, Environmental, Safety and Security (“TESS”) Committee is responsible for overseeing policies and programs related to sustainability, environmental and climate-related matters and for reviewing significant risks associated with these matters.

In early 2020, a dedicated ESG department was created to manage the overall ESG strategy and the global sustainability program, Sail & Sustain. The ESG team reports directly to the Chief Financial Officer. In early 2021, we also implemented two layers of ESG oversight including the Sail & Sustain Executive Leadership Council as well as the Sail & Sustain Task Force.

The Audit Committee of the Board oversees the Enterprise Risk Management (“ERM”) program. The SVP of Internal Audit & ERM facilitates the ERM process on behalf of the Audit Committee and management, including the ERM Steering Committee, to allow our major business risks to be assessed and managed appropriately, including those that are related to climate change. The ERM Steering Committee is comprised of all executive officers reporting up to the CEO & President.

The full Board, along with the TESS Committee and the Audit Committee, monitors management’s actions related to these risks and assesses whether the actions needed to mitigate these risks are appropriately considered in the Company’s strategies, risk management policies, business plans and annual budgets.

The management team is ultimately responsible for the climate change strategy and ensuring climate-related risks are being appropriately mitigated. In addition to our layers of oversight for ESG, we created a formal governance structure to oversee our climate action and decarbonization strategy. In early 2022, we established a Decarbonization Executive Steering Committee, which is responsible for governing and steering the Company-wide climate action and decarbonization strategy. The committee is comprised of the CEO & President and executive officers. To supplement the committee, a Decarbonization Action Group comprised of senior leaders across the organization was also created to enhance cross-collaboration and coordination in support of the Company’s climate action strategy and goals.

RISK MANAGEMENT

Our Board recognizes that effective risk oversight is critical to our long-term success and the fulfillment of its fiduciary duties to our stakeholders. While our management team is responsible for the day-to-day management of our risks and implementing appropriate risk management strategies, our Board is responsible for fostering an appropriate culture of risk management, understanding our enumerated top risks and monitoring how management mitigates such risks.



Our independent Internal Audit department (“IA”) facilitates the ERM process on behalf of our executive management team and the Board’s Audit Committee, to allow our major business risks to be assessed and managed appropriately, including those related to climate change. IA conducts ongoing reviews of the most significant risks to the organization throughout the year, including hosting informational sessions and encouraging risk-related feedback from risk owners and other key stakeholders. Feedback is evaluated and then presented to the Audit Committee and management for improvement to risk management practices.

IA works closely with the ESG team to ensure alignment among ESG and related risks. For climate-related risks specifically, a cross-functional group, made up of ESG, IA and Finance, works with key internal stakeholders, including but not limited to vessel operations, ports and destinations development, and sourcing, to continuously identify and assess climate-related risks and opportunities.

STRATEGY

Climate Screening

To supplement the ERM process, we conducted an extensive Company-wide climate risk screening process in 2021 to identify, assess, and quantify our Company’s climate-related transition and physical risks, as well as corresponding opportunities. The scope of this screening is global and includes both organization-wide impacts as well as asset-level impacts, including highly populated office locations, data centers, port locations and key suppliers. Supported by a third-party sustainability consultant, the assessment helped us gain a better understanding of our risk exposure, create a roadmap for scenario analysis and resiliency planning, and inform strategies for leveraging opportunities.

Through the climate screening process, stakeholders were engaged in workshops to rate a variety of relevant risks across short (0-1 years), medium (1-5 years), and long term (5-10 years) horizons, based on impact and vulnerability. Through the screening, we identified eight relevant physical risks and twelve relevant transition risks which were then prioritized to understand which climate risks had the greatest scope of impact, how they are currently managed, and opportunities to further strengthen resilience.

TRANSITION RISKS



1. Cost of carbon



2. Mandates & regulations related to emissions



3. Cost of the energy transition



4. Ability to attract capital due to lagging climate goals



5. Availability and/or cost of raw & synthetic materials



6. Climate-related brand value



7. Customer demand for responsible environmental practices & services



8. Cost of carbon credits



9. Litigation risk associated with ability to mitigate & accurately report climate impacts & risks



10. Climate-related reporting requirements



11. Higher cost of equity & debt



12. Ability to attract & retain employees

PHYSICAL RISKS



1. Sea level rise & coastal flooding



2. Wind & storm damage



3. Power outages from increasing frequency & severity of storms



4. Flooding from extreme weather events



5. Grid reliability



6. Drought & wildfire



7. Temperature rise



8. Team member & guest safety from changing temperatures

Scenario Analysis

We completed scenario analysis modeling against the Representative Concentration Pathways (“RCP”) 2.6, 4.5, and 8.5 to evaluate the various climate impacts in “future worlds”, initially focusing on the highest priority physical and transition risks: coastal flooding from rising sea levels and the cost of carbon.

An accompanying quantitative analysis considered the likelihood and financial implications of these risks in hypothetical scenarios. The analysis is not necessarily indicative of future performance, as it does not take into account potential risk-mitigation or adaptation efforts at this time. Instead, the analysis assesses the risks and provides guidance in how further investment can enhance resilience across our value chain and support our climate action goals. Looking forward, we plan to further explore the results of our climate screening and conduct additional assessments for other priority climate risks identified.

TRANSITION RISK: COST OF CARBON

The most significant risk identified for the Company is the cost of carbon from an aggressive global transition to a low carbon economy. To further understand our Company’s exposure to a price on carbon, we examined what the implications would be across six plausible scenarios for our vessels, offices, and islands.

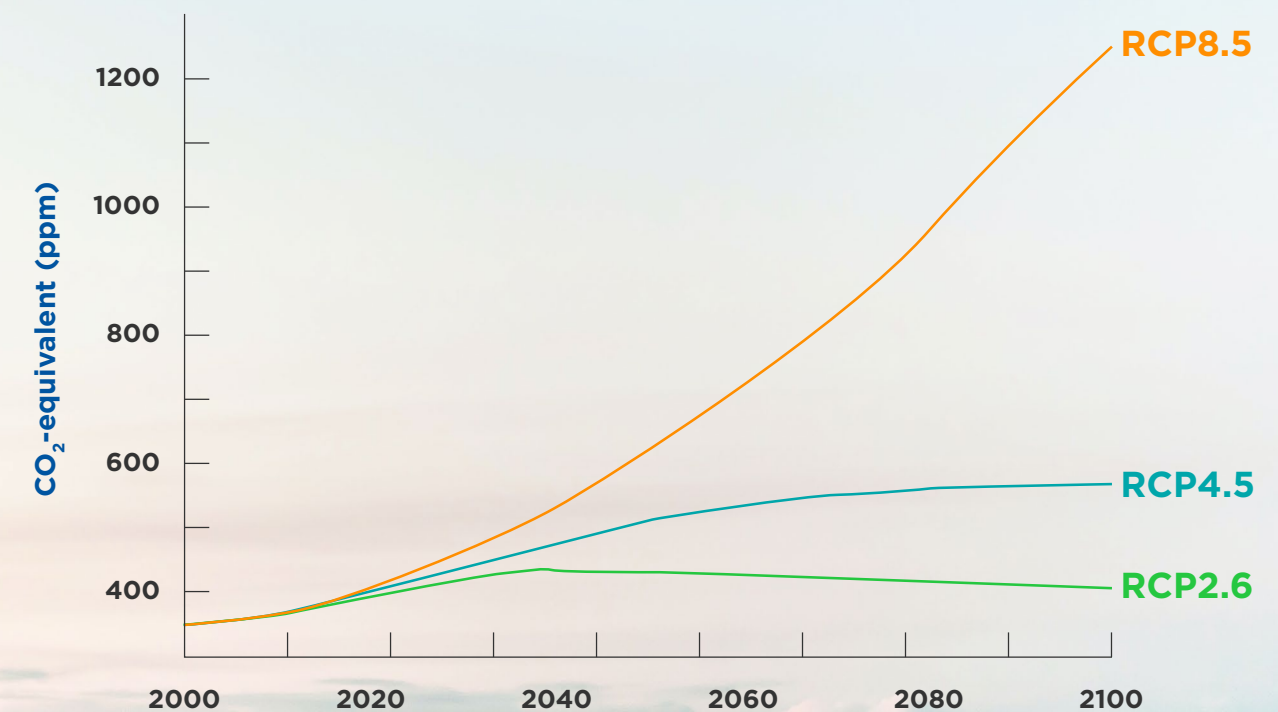
The Network for Greening the Financial System (“NGFS”) scenarios, developed by central financial institutions from eight major economies were used to understand the scope of impact which a cost of carbon could impose on the Company. NGFS provides six different future world scenarios (Below 2°C, Net Zero by 2050, Delayed Transition, Divergent Net Zero, Nationally Determined Contributions, and Current Policies), using three different integrated assessment models (GCAM 5.3, MESSAGEix-GLOBIOM, and REMIND-MAGPIE 4.2). NGFS pricing is driven by the Global Change Analysis Model (“GCAM”), an integrated assessment tool that represents the behavior and complex interactions between energy systems, water, agriculture and land use, economy, and climate.

Our analysis of multiple NGFS scenarios captures the range of plausible financial implications for the Company in the transition to a low carbon economy. It’s clear that our investments in resource and fuel efficiency will reduce our Company’s exposure to future carbon, while building resiliency in this global transition. Our investments today better prepare our Company for future increasing mandates and regulations on our operations. We plan to integrate these findings into strategic and financial planning to support our Company’s transition to a low carbon economy.

REPRESENTATIVE CONCENTRATION PATHWAYS

The Intergovernmental Panel on Climate Change’s Representative Concentration Pathways model trajectory and end-state climate scenarios based on GHG emissions and other factors.

- **Low (RCP 2.6):** Characterized by an initial peak followed by strongly declining emissions, this pathway assumes that stringent controls are invoked to reduce emissions, likely limiting global temperature rise to <2°C by 2100.
- **Intermediate (RCP 4.5):** Characterized by slowly declining emissions, this pathway assumes climate policies will be invoked to limit emissions, resulting in likely global temperature rise of 2–3°C by 2100.
- **High (RCP 8.5):** Characterized by rising emissions, this pathway adheres to the current trajectory and assumes no additional efforts are made to constrain emissions, leading to likely global temperature rise of >4°C by 2100.



PHYSICAL RISK: COASTAL FLOODING FROM RISING SEA LEVELS

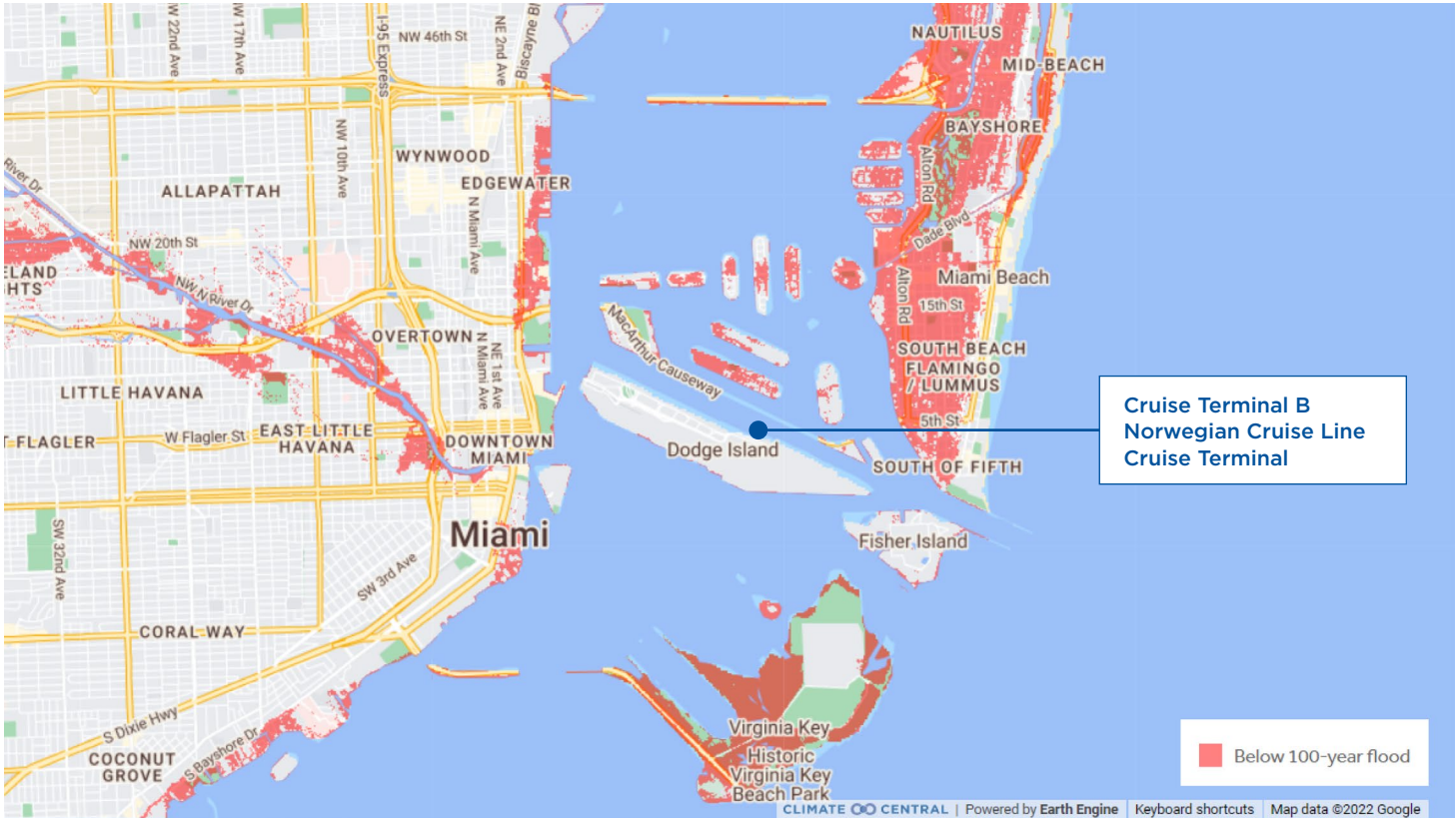
Coastal flooding from rising sea levels and storm surge was identified as the top physical risk from our climate screening. Potential impacts from this risk to the Company include lost revenue if ships are not able to operate scheduled itineraries, damage to assets including vessels, private islands and other critical infrastructure which could require significant costs to repair and potential reputational damage. In our modeling, both sea level rise and coastal flooding from storm surges were analyzed concurrently. The following data sets were examined:

- **Sea Level Rise:** The Company used NASA's Sea Level Rises projections from the Sixth Assessment Report ("AR6") from the Intergovernmental Panel on Climate Change ("IPCC"). The data provides global and regional sea level projections from 2020 to 2150.
- **Storm Surge Inundation:** Inundation refers to the degree of damage done to infrastructure from sea level rise and associated complications. Central Climate inundation data applies machine learning to develop a high-accuracy digital elevation model ("DEM") for coastal areas. The maps used by Central Climate also use the AR6 sea level projections from the IPCC.

From these two data sets, the locations were predicted to have low, medium or high impacts, taking into account the inundation from 1-in-10-year storm events in 2030, 2040, and 2050. We modeled the impacts from rising sea levels for priority ports and locations, measuring the risk exposure in these hypothetical future conditions. Our analysis focused on 35 priority ports and locations, each of which we modeled 18 scenarios for.

Because our Company has decades of experience in storm avoidance, resiliency to severe weather is already embedded in our operations. To prepare for increases in frequency and severity of acute extreme weather events, our headquarters and ships have invested significantly in contingency plans which are in place for various extreme weather scenarios. Our ships are also mobile and our itineraries are designed with a high degree of flexibility, allowing us to modify as needed and reroute ships to avoid extreme weather events. Additionally, our itineraries are constantly reviewed by fleet Captains and other shoreside team members to ensure that we are remaining flexible, minimizing fuel expense and delivering quality service. We also partner closely with local and regional governments including port authorities at our priority ports and locations to appropriately manage climate-related risks, including the impact of extreme weather events on port infrastructure. In 2022, we added a new position, SVP of Port Development and Construction Management, to further strengthen this relationship with our ports and destinations.

Though we have strong resiliency to severe weather already built in our processes, this analysis reinforced the importance which will inform our future long-term financial planning for mitigation and adaptation investment at priority ports. The analysis also demonstrated the strategic importance of investing in increasing the resilience of critical port infrastructure.



The image above visualizes the hypothetical state of PortMiami and its surrounding areas in 2050 in the RCP 8.5 future warming scenario. While the port is predicted to experience a low impact due to its infrastructure adaptation, the areas in red are considered to have high inundation impacts from sea level rise and storm surge.

LEVELS OF IMPACT

- **Low:** Inundation is projected, but little or no effect is projected to critical port or access infrastructure. Assumed that the impact would be mitigated prior to the event occurring at the future date The port should be acceptable for future cruises.
- **Medium:** Infrastructure is projected to be directly impacted by either sea level rise, storm surge, or both. There is a level of impact that would require significant investment by port authorities/ local municipalities to mitigate damage prior to the anticipated timeframe. The port could be impacted for future cruises.
- **High:** Infrastructure is significantly impacted, being that the access infrastructure of the port itself will be inundated by a future event. Mitigation would require significant investment by multiple parties. The port will most likely be impacted for future cruises – it is questionable that the port will be functional under these circumstances.

METRICS AND TARGETS

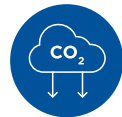
- As part of our ISO 14001-certified Environmental Management System (“EMS”), goals and targets have been established to reduce our environmental impact including reductions in water and fuel consumption as well as waste mitigation.
- In 2018, we signed the Cruise Lines International Association (“CLIA”) historic commitment to reduce the carbon emissions rate industry-wide by 40% by 2030. This commitment was created as a first step to contribute to the International Maritime Organization’s vision of a carbon-free shipping industry by the end of the century.
- In 2021, we announced our goal to reach carbon neutrality alongside our long-term climate action strategy.
- In early 2022, we made an important step towards shared accountability to set GHG reduction targets. The Compensation Committee of our Board approved the inclusion of an ESG metric, as part of our 2022 short-term incentive (“STI”). If the Company makes sufficient progress on setting GHG reduction targets during 2022, as determined by the TESS Committee, an additional percentage of target will be paid to eligible shoreside employees. STI eligible employees extend deep into our organization, encompassing our entire shoreside Manager and above leadership team. We will continue to review and evolve our incentive compensation plan to build greater accountability and accelerate the progress on our ESG goals.
- In 2022, we committed to pursue net zero by 2050 and to set short- and near-term GHG reduction targets.

MTCO ₂ e	2017	2018	2019	2020
Scope 1 Emissions	2,504,436	2,615,864	2,687,980	1,442,306
Scope 2 Emissions ¹	5,073	4,514	4,971	3,931
Scope 3 Emissions (Employee Commuting Only)	N/A ²	N/A ²	4,465	1,287
Total	2,509,509	2,620,378	2,697,416	1,447,524

1 Scope 2 Emissions are calculated using the Market-Based method.
2 Company began calculating Scope 3 emissions related to employee commuting in 2019.

Climate Action Strategy

We believe it is our responsibility to take an active role in addressing climate change. We are using the findings of our climate screening and scenario analysis to test the agility and resilience of our strategy and actions and will be evolving the strategy as appropriate. Currently, the strategy focused on three actions:



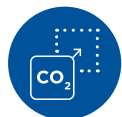
1. REDUCE CARBON INTENSITY

We continually monitor and seek opportunities to reduce our overall footprint by increasing energy efficiency and minimizing fuel consumption. From 2008 to 2019, we reduced our fuel consumption per capacity day by approximately 17% for our entire 28-ship fleet. As a result, CO₂ emissions per capacity day across our fleet was reduced ~14% from 2015 to 2019. As nine new and more fuel-efficient vessels are introduced to the fleet through 2027, this rate is expected to further decrease.



2. INVEST IN TECHNOLOGY AND EXPLORE ALTERNATIVE FUELS

We are committed to making investments in research and development to improve our footprint and meet regulatory requirements. The transition to a low carbon economy creates opportunities for research and development in identifying and scaling alternative fuel sources. We are highly supportive of these efforts and have partnered with CLIA and other maritime organizations to propose the establishment of a \$5 billion fund dedicated to financing the development of alternative fuels and propulsion technologies. As new alternative fuel sources become available at sufficient scale in the future, we will evaluate how these can accelerate our long-term carbon reduction strategy. For example, we are actively engaging with partners including engine manufacturers and classification societies in planning for a safe and effective methanol engine retrofit.



3. IMPLEMENT VOLUNTARY CARBON OFFSET PROGRAM

We have committed to purchase verified carbon credits to offset three million metric tons of carbon dioxide equivalent (MTCO₂e) over a three-year period beginning 2021. While our ultimate goal is to reduce our absolute emissions, we are purchasing carbon offsets to address gaps in our decarbonization efforts until new technology and alternative fuel becomes available.

We publicly disclose climate-related information through our annual CDP Climate Change response.
The below table maps TCFD’s recommendations to our CDP responses, which will be updated later this year.

TCFD Core Element	TCFD Disclosure Requirement (Short)	TCFD Disclosure Requirement (Complete)	CDP 2021 Climate Change
Governance	Degree of board oversight	Describe the board’s oversight of climate-related risks and opportunities.	C1.1b
	Management role	Describe management’s role in assessing and managing climate-related risks and opportunities.	C1.2, C1.2a
Strategy	Climate-related risks and opportunities	Describe the climate-related risks and opportunities the Company has identified over the short, medium, and long term.	C2.1a, C2.3, C2.3a, C2.4, C2.4a
	Impacts of risks and opportunities	Describe the impact of climate-related risks and opportunities on the Company’s businesses, strategy, and financial planning.	C2.3a, C2.4a, C3.1, C3.3, C3.4, C3.4a
	Resilience of the organization’s strategy	Describe the resilience of the Company’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	C3.2, C 3.2a, 3.2b
Risk Management	Climate risk identification process	Describe the Company’s processes for identifying and assessing climate-related risks.	C2.1, C2.2a
	Climate risk management process	Describe the Company’s processes for managing climate-related risks.	C2.1, C2.2
	Integration with other risk-management processes	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the Company’s overall risk management.	C2.1, C2.2
Metrics & Targets	Identify risk-assessment metrics	Disclose the metrics used by the Company to assess climate-related risks and opportunities in line with its strategy and risk management process.	C4.2, C4.2a, C4.2b, C9.1
	Identify GHG Emissions	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	C6.1, C6.3, C6.5, C6.5a
	Identify targets and risk metrics	Describe the targets used by the Company to manage climate-related risks and opportunities and performance against targets.	C4.1, C4.1a, C4.1b, C4.2, C4.2a, C4.2b

CAUTIONARY STATEMENT CONCERNING FORWARD-LOOKING STATEMENTS

Some of the statements, estimates or projections contained in this report are “forward-looking statements” within the meaning of the U.S. federal securities laws intended to qualify for the safe harbor from liability established by the Private Securities Litigation Reform Act of 1995. All statements other than statements of historical facts contained, or incorporated by reference, in this report, including, without limitation, those regarding our business strategy, financial position, results of operations, plans, prospects, actions taken or strategies being considered with respect to our I and objectives of management for future operations (including those regarding expected fleet additions, our ability to weather the impacts of the COVID-19 pandemic, our expectations regarding the resumption of cruise voyages and the timing for such resumption of cruise voyages, operational position, demand for voyages, plans or goals for our sustainability program and decarbonization efforts) are forward-looking statements. Many, but not all, of these statements can be found by looking for words like “expect,” “anticipate,” “goal,” “project,” “plan,” “believe,” “seek,” “will,” “may,” “forecast,” “estimate,” “intend,” “future” and similar words. Forward-looking statements do not guarantee future performance and may involve risks, uncertainties and other factors which could cause our actual results, performance or achievements to differ materially from the future results, performance or achievements expressed or implied in those forward-looking statements. Examples of these risks, uncertainties and other factors include, but are not limited to the impact of: the spread of epidemics, pandemics and viral outbreaks and specifically, the COVID-19 pandemic, including its effect on the ability or desire of people to travel (including on cruises), which is expected to continue to adversely impact our results, operations, outlook, plans, goals, growth, reputation, cash flows, liquidity, demand for voyages and share price; implementing precautions in coordination with regulators and global public health authorities to protect the health, safety and security of guests, crew and the communities we visit and to comply with regulatory restrictions related to the pandemic; legislation prohibiting companies from verifying vaccination status; our indebtedness and restrictions in the agreements governing our indebtedness that require us to maintain minimum levels of liquidity and be in compliance with maintenance covenants and otherwise limit our flexibility in operating our business, including the significant portion of assets that are collateral under these agreements; our ability to work with lenders and others or otherwise pursue options to defer, renegotiate, refinance or restructure our existing debt profile, near-term debt amortization, newbuild related payments and other obligations and to work with credit card processors to satisfy current or potential future demands for collateral on cash advanced from customers relating to future cruises; our need for additional financing or financing to optimize our balance sheet, which may not be available on favorable terms, or at all, and our outstanding exchangeable notes and any future financing which may be dilutive to existing shareholders; the unavailability of ports of call; future increases in the price of, or major changes or reduction in, commercial airline services; changes involving the tax and environmental regulatory regimes in which we operate, including new regulations aimed at reducing greenhouse gas emissions; the accuracy of any appraisals of our assets as a result of the impact of the COVID-19 pandemic or otherwise; our success in controlling operating expenses and capital expenditures; trends in, or changes to, future bookings and our ability to take future reservations and receive deposits related thereto; adverse events impacting

the security of travel, such as terrorist acts, armed conflict and threats thereof, acts of piracy, and other international events; adverse incidents involving cruise ships; adverse general economic and related factors, such as fluctuating or increasing levels of interest, unemployment, underemployment and the volatility of fuel prices, declines in the securities and real estate markets, and perceptions of these conditions that decrease the level of disposable income of consumers or consumer confidence; breaches in data security or other disturbances to our information technology and other networks or our actual or perceived failure to comply with requirements regarding data privacy and protection; changes in fuel prices and the type of fuel we are permitted to use and/or other cruise operating costs; mechanical malfunctions and repairs, delays in our shipbuilding program, maintenance and refurbishments and the consolidation of qualified shipyard facilities; and other factors set forth under “Risk Factors” in our most recently filed Annual Report on Form 10-K and subsequent filings with the Securities and Exchange Commission. Additionally, many of these risks and uncertainties are currently amplified by and will continue to be amplified by, or in the future may be amplified by, the COVID-19 pandemic. It is not possible to predict or identify all such risks. There may be additional risks that we consider immaterial or which are unknown. The above examples are not exhaustive and new risks emerge from time to time. Such forward-looking statements are based on our current beliefs, assumptions, expectations, estimates and projections regarding our present and future business strategies and the environment in which we expect to operate in the future. These forward-looking statements speak only as of the date made. We expressly disclaim any obligation or undertaking to release publicly any updates or revisions to any forward-looking statement to reflect any change in our expectations with regard thereto or any change of events, conditions or circumstances on which any such statement was based, except as required by law.