

HUMAN RIGHTS STATEMENT

OUR COMPANY

Norwegian Cruise Line Holdings Ltd. (the “Company”, “we”, “our”, “us”, or “NCLH”) is a leading global cruise company which operates the Norwegian Cruise Line, Oceania Cruises and Regent Seven Seas Cruises brands. To learn more, please visit www.nclhltd.com.

In 2023, a human rights assessment was undertaken to help our Company identify and prioritize the human rights risks relevant to our business activity and relationships. Guided by a third-party sustainability consultancy firm, the assessment included a due diligence review that covered the following salient human rights risks against the United Nations Guiding Principles salience criteria of scope, scale, remediability and likelihood:

- Access to Grievance Mechanisms and Remedy
- Child Labor and Juvenile Work
- Climate Change and Environmental Impacts
- Community Rights and Engagement
- Discrimination and Harassment
- Ethical Business Practices
- Freedom of Association and Collective Bargaining
- Health and Safety
- Modern Slavery, Human Trafficking, and Forced Labor
- Privacy and Data Security
- Working Conditions

Our human rights risks assessment covered the following potentially vulnerable groups:

- Children and young people (under 18 years old)
- Elderly people
- Human rights defenders
- Indigenous Peoples
- Individuals from minority ethnic, religious, language groups
- LGBTQI+ individuals
- Local communities
- Low-income populations
- Migrant workers
- People with disabilities
- Temporary workers
- Union workers
- Women and young girls

The findings from the human rights assessment informed this Human Rights Statement (“Statement”), which outlines the Company’s objectives and commitments. This Statement highlights our expectations for respecting and upholding human rights and provides a reference to guide actions and decision making on behalf of the Company. The Statement is an important step in our efforts to refine our existing human rights management processes.

OUR OBJECTIVES AND COMMITMENTS

We are committed to operating our business ethically and with integrity to build a culture of trust and confidence with our key stakeholders including team members, suppliers, guests, partners, investors and more.

Across our three brands, we have numerous policies outlining standards to respect human rights in accordance with internationally accepted standards. Many of these policies directly address the requirements described in the Maritime Labor Convention (MLC), an international labor convention adopted by the International Labor Organization (ILO).

We support human rights and condemn all forms of child exploitation, forced labor and human trafficking, including sex trafficking. We prioritize human rights considerations across our organization, create and maintain policies to protect our guests and team members and clearly define expectations for our own operations, suppliers, contractors and partners. We endeavor to refrain from practices that can give rise to risks of forced or involuntary labor, human trafficking and other practices defined as modern slavery.

Our Company's expectations are outlined as follows:

- Child Labor: comply with all local and national minimum working age laws and regulations and condemn the use of child labor.
- Forced Labor: condemn 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: 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: provide a safe and healthy work environment and comply with applicable safety and health laws and regulations and take precautions and implement procedures to mitigate health and safety risks.
- Wages and Working Hours: comply with applicable laws governing wages and working hours and provide all legally mandated benefits.
- Freedom of Association: respect employee rights to freedom of association and collective bargaining, consistent with applicable law.

GOVERNANCE

Our corporate governance processes are guided by our values and established with high standards of transparency and accountability. Our Board of Directors and executive management team are committed to practicing good governance, effectively managing risk and continually seeking ways to improve business practices. At the Board of Directors level, the Technology, Environmental, Safety and Security (TESS) Committee receives regular updates on sustainability risks and initiatives, including matters associated with human rights.

We emphasize the importance of conducting business legally and ethically and all team members, executives and directors are required to adhere to our [Code of Ethical Business Conduct \(Code\)](#) at all times. Our Corporate Ethics Officer oversees the design and maintenance of policies, procedures and trainings to maintain our high ethical standards. All newly hired team members complete Code of Ethical Business Conduct training. In addition, every year, all team members are provided a refresher and required to review and certify the Code.

In addition, we set forth clear expectations for our suppliers through our [Supplier Code of Conduct](#). The Supplier Code of Conduct formalizes our expectations in areas including legal and regulatory compliance, ethics, employment and labor practices and environmental responsibility. All of our suppliers are expected to know and comply with all relevant regulations including employment laws and operate in a manner that supports human rights. Major suppliers are also asked to share our expectations with their own supply chains. New and existing suppliers sourced through our Supply Chain Department are required to sign the Supplier Code of Conduct and complete an annual attestation of compliance. In 2023, we began to integrate the Supplier Code of Conduct into new contracts and purchase orders.

We also outline the efforts to address the risks of modern slavery (including forced labor and human trafficking) in our operations and supply chain within our [Modern Slavery Statement](#). This statement is reviewed and approved by our Board of Directors and signed by the Chairman of our Board of Directors and by our President and Chief Executive Officer.

We are committed to creating an environment where open, honest communication is the expectation, not the exception. If a team member, supplier or other stakeholder prefers to place an anonymous report, they are encouraged to use our [Reporting Hotline](#), hosted by a third-party hotline provider, EthicsPoint. The hotline can be used to submit reports relating to violations of human rights, raise any potential concerns, ask questions, provide suggestions or ask for guidance related to policies and procedures.

NCLH reserves the right to amend or modify this statement from time to time.

Last updated July 18, 2024.