

## SUPPLIER CODE OF CONDUCT

At Norwegian Cruise Line Holdings Ltd. (including its brands and subsidiaries, “NCLH” or “the Company”), we hold ourselves to high ethical standards—and we expect the same from our vendors, suppliers, contractors, agents, and other third parties (“Suppliers”). This Supplier Code of Conduct (“Code”) outlines the expectations we have for our Suppliers. By working with NCLH, you agree to comply with this Code. A violation of this Code, subject to any other applicable contractual terms, may result in immediate termination of your business relationship with us. This Code is not exhaustive and there may be other conduct that is considered unacceptable for NCLH’s Suppliers. This Code applies to you and to any subcontractors you use to perform work for NCLH.

## 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 engage with the press or public on behalf of NCLH unless expressly authorized in writing to do so by NCLH's Corporate Communications or PR team.

## Data Privacy and Information Security

Suppliers will comply with applicable data privacy and protection laws and regulations and will promptly notify NCLH at [SOC@nclcorp.com](mailto:SOC@nclcorp.com) 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.

## 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.

### Environmental Considerations

Suppliers consider the following topics when evaluating their environmental impacts: preventing pollution, sustainable waste management, resource efficiency, responsible sourcing of raw materials, biodiversity impact, deforestation issues and land conservation, greenhouse gas emissions, energy consumption and animal welfare.

## 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 may 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

Anyone is 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.nclhltd.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: June 6, 2025

Acknowledged and Agreed:

By: \_\_\_\_\_

Supplier: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_