

Independent Assurance Statement

Introduction

DNV Business Assurance USA, Inc. (DNV) has been commissioned by the management of Norwegian Cruise Line Holdings Ltd. (NCLH) to carry out an independent verification of its 2023 environmental and social diversity assertions. These assertions are relevant to the 2023 calendar year.

NCLH has sole responsibility for preparation of the data and external report. DNV, in performing our assurance work, is responsible to 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:

- Fleet-wide water consumption and withdrawal with a breakdown by source
- Amount of ship waste discharged to the environment and percentage treated prior to discharge
- Percentage of fleet implementing ballast water exchange and ballast water treatment
- Air emissions of the following pollutants: (1) NO_x (excluding N₂O), (2) SO_x, and (3) Particulate matter (PM₁₀)
- Number of notices of violations received for dumping of waste
- Total energy consumed – Gigajoules (GJ)
- Percentage heavy fuel oil
- Percentage onshore power supply (OPS)
- Percentage renewable
- Ship waste breakdown by disposal category
- Global gender diversity
- US 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 17029:2019 - Conformity Assessment General principles and requirements for validation and verification bodies, 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	Nina Diaz
Lead Verifier	Kevin Poirier
Verifier	Yishuang Xu
Technical Reviewer	Shruthi Poonacha Bachamanda

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 Account Standards Board (SASB) Standards

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 footprint inventories 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 of managers and data users representing relevant functions for supporting the environmental and social inventory management process;
- Assessment of environmental and social information systems and controls, including:
 - Selection and management of all relevant environmental and social data and information;
 - Processes for collecting, processing, consolidating, and reporting the environmental data and information;
 - Systems and processes that ensure the accuracy of the environmental and social data and information;
 - Design and maintenance of the environmental and social information system;
 - 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 and social 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

Wastewater and water

- Water usage on vessels 7,587,941 (m3)
- Water withdrawal by source
 - Reverse osmosis (51%) 3,869,068 (m3)
 - Evaporators (38%) 2,874,111 (m3)
 - Bunkered (11%) 836,312 (m3)
- Percentage of fleet implementing (1) ballast water exchange and (2) ballast water treatment 100% of fleet has D2 compliant ballast water treatment systems

Air Emissions

- NOx 65,050 (Mt/year)
- SOx 2,138 (Mt/year)
- PM₁₀ 4,305 (Mt/year)

Energy

- Total energy consumed – Gigajoules (GJ) 42,740,313
- Percentage heavy fuel oil 99.68%
- Percentage onshore power supply (OPS) 0.03%
- Percentage renewable 0.01%

Waste

- Number of notices of violation received for dumping in 2023 6 notices for 5 separate incidents – 2 notices were issued for the same incident
- 2023 Amount of ship waste discharged to the environment
 - Total amount discharged 7,115,863 (m3)
 - Percentage treated prior to discharge ~80%
- 2023 Ship waste breakdown by disposal category
 - Total Landfilled including operational landfilled & hazardous waste (52%) 69,074 tons
 - Total Recycled (12%) 15,941 tons
 - Total Donation (<1%) 209 tons
 - Total Incinerated (36%) 47,479 tons

Social

- Global gender diversity

	Male%	Female%
▪ All team members	74%	26%
▪ Shoreside team members	41%	59%
▪ Shoreside managers and above	52%	48%
▪ Shipboard team members	79%	21%
▪ Shipboard managers (3-stripes) and above	85%	15%
- US ethnic diversity by¹:

	Non-URMs%	URMs ² %
▪ Shoreside team members	33%	67%
▪ Shoreside managers and above	47%	53%
- US ethnic diversity breakdown for shoreside team members

▪ American Indian / Alaska Native	0.4%
▪ Asian	3.5%
▪ Black / African American	16.5%

¹ US ethnic diversity metrics are based on self-identified team members.

² 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. who have self-identified. Except for Pride of America, we do not track ethnicity/race for our shipboard team members as the majority are URMs from a U.S. perspective.



- Hispanic / Latino 46.3%
- Native Hawaiian / Other Pacific Islanders 0.2%
- White 33.1%

Assurance Opinion

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

Independence

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

DNV Business Assurance USA, Inc.
May 6, 2024

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Technical Reviewer
Shruthi Poonacha Bachamanda

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