

VENDOR CODE OF CONDUCT

Norwegian Cruise Line Holdings Ltd. (including its brands and subsidiaries, “NCLH”) sets high ethical standards for its employees, officers and directors and expects its vendors, suppliers, contractors, agents and others who do business with NCLH (“Vendors”) to share NCLH’s commitment to operating responsibly. NCLH has developed this Vendor Code of Conduct (“Code”) to clarify its expectations for its Vendors and NCLH’s Vendors are required to comply with this Code. A violation of this Code, subject to any other applicable contractual terms, may result in immediate termination as an NCLH Vendor. This Code is not exhaustive and there may be other conduct that is considered unacceptable for NCLH’s Vendors.

LEGAL, REGULATORY COMPLIANCE AND ETHICS

Trade

Vendors will comply with applicable trade control and trade sanction laws and regulations as well as all applicable export and import requirements.

Anti-Corruption

Vendors will not offer or accept bribes or kickbacks to obtain or retain business or to obtain any undue or improper advantages. Vendors 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

Vendors will comply with applicable antitrust and fair competition laws.

Insider Trading

Vendors 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

Vendors are prohibited from providing or offering gifts to NCLH employees that could inappropriately influence NCLH's business decisions or cause the Vendor to gain an unfair advantage. Vendors will not negotiate directly with NCLH employees who hold or whose immediate family members hold significant financial interests in the Vendor or with a Vendor employee's immediate family member who is employed by NCLH. Vendors 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

Vendors will maintain accurate books and records in accordance with applicable legal and regulatory requirements and accepted accounting practices.

Confidential Information and Intellectual Property

Vendors will protect NCLH's confidential information, trade secrets and personal data about NCLH's employees and guests. Vendors will comply with applicable data privacy and protection laws and regulations and will notify NCLH of any actual or threatened data breaches that involve NCLH, its guests or employees upon discovery. Vendors will protect and responsibly use NCLH's physical and intellectual property if authorized to use such property by NCLH.

Press

Vendors will not speak to the press or public on behalf of NCLH unless expressly authorized in writing to do so by NCLH.

EMPLOYMENT PRACTICES

Child Labor

Vendors will comply with all local and national minimum working age laws and regulations and will not use child labor.

Forced Labor

Vendors 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

Vendors 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

Vendors will provide a safe and healthy work environment and will comply with applicable safety and health laws and regulations. Vendors will take precautions and implement procedures to mitigate health and safety risks.

Wages and Working Hours

Vendors will comply with applicable laws governing wages and working hours and provide all legally mandated benefits.

Freedom of Association

Vendors 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. Vendors will comply with applicable environmental laws and regulations.

COMPLIANCE WITH THE CODE

Vendors are required to educate and train their employees on the obligations in this Code. As a condition to maintaining a business relationship with NCLH, Vendors will periodically be asked to acknowledge their obligation to comply with the Code. NCLH may conduct reasonable audits to verify a Vendor's compliance with the Code.

REPORT SUSPECTED VIOLATIONS OF THIS CODE

A Vendor's employees or contractors are 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 <http://www.nclhldinvestor.com/corp-governance/reporting>.

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>.

By: _____

Name: _____

Title: _____

Dated: _____

Signature: _____

April 6, 2021