



Section 1: Introduction

The United Kingdom's Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018 require companies like ours to disclose information regarding their efforts to combat slavery and human trafficking in their supply chain and within their business operations. We take this responsibility very seriously and are proud of the measures we have taken in this regard. We acknowledge the need to continue and build upon this important work.

This statement sets out the action taken by Carnival Corporation & plc to combat slavery and human trafficking within our internal operations and in our supply chains and covers over the fiscal year ending 30 November 2022 ("the reporting period").

For the purposes of this statement, the reporting entity is Carnival plc. However, given the structure of our business (outlined in Section 2 below), many of the policies, procedures and initiatives are applied across both Carnival plc and Carnival Corporation.

a - Our commitment to respecting human rights

At Carnival Corporation & plc, our mission and purpose is to deliver unforgettable happiness to our guests by providing extraordinary cruise vacations, while honouring the integrity of every ocean we sail, place we visit and life we touch.

We are committed to living up to the highest standards of ethical behaviour and integrity and recognise that it takes commitment from every one of our people to create a stronger, more inclusive culture. We therefore created our Culture Essentials which are the non-negotiable beliefs and behaviours that define who we are, what we stand for, and how we operate. They connect us to each other and the organization and serve as guiding principles that all of our employees, at all levels, shipboard and shoreside, must embrace and model to help us deliver our mission & purpose.

Respecting human rights in accordance with internationally recognised standards is an integral part of our global commitment to responsible business. Our Human Rights Policy is an expression of our commitment to promote and foster human rights, in line with the principles set out in the United Nations' Universal Declaration of Human Rights and summarizes our key areas of focus as we strive to live up to this commitment. Some of our Human Rights Policy's focus areas include:

- **Our People:** Providing a safe and healthy environment and working conditions for our employees, and all others, including third parties working for us or on our behalf, is at the core of what we do every day.
- **Diversity, Equity and Inclusion:** We welcome and celebrate diversity of differences in gender, age, race, ethnicity, and national origin, range of abilities, sexual orientation, gender identity, financial means, education, and political perspective.
- **Training and Capability Building on Human Rights** throughout the organization and beyond, via our Code of Business Conduct and Ethics.
- **Health, Environment, Safety and Security:** Focusing on detection, prevention, implementation, feedback and improvement.
- **Modern Slavery and Human Trafficking:** We condemn all forms of exploitation and forced labour.
- **Our Environment and Communities** Having access to a healthy environment is a fundamental human right – and one of our top priorities.

As a global leader in the cruise sector, we work together with a wide range of stakeholders to identify challenges and implement effective solutions across our operations and supply chain. We seek to advance human rights through our business activities and are committed to ongoing human rights due diligence in support of these efforts. This statement details how we are progressing our journey to globally identify, assess and mitigate ongoing risks relating to human rights across our business and supply chain.

We are committed to respecting the rights of all workers and communities throughout our supply chain, and to ensuring we are in the best position to prevent, identify, and address actual or potential human rights and environmental impacts caused by or linked to our business operations.

b- Modern Slavery

Modern slavery remains one of the most severe global human rights challenges facing society. Over 40 million men, women and children are in some form of modern slavery. At least 16 million are victims of forced labour in the private sector (International Labour Organization). Human rights abuses of any kind are unacceptable, and as one of the world’s leading cruise companies, we have a clear responsibility to respect human rights throughout our business and our supply chain. We also recognise that everyone has a role to play in tackling it and we actively encourage those we do business with to prevent, mitigate and address adverse impacts on human rights, including modern slavery.

The insidious nature of modern slavery presents challenges to effectively stamp out and eliminate this practice. While our work is ongoing, the actions we have taken to address the risks of modern slavery across our operations and in our supply chains includes:

- Codes and policies for our people and Business Partners;
- Business Partner due diligence;

- Monitoring of Business Partners;
- Robust recruitment practices;
- Maintaining a Compliance Reporting Hotline;
- Training and awareness building.

These efforts are described more fully in the relevant sections of this statement.

Section 2: Our structure, business model and supply chain

a- Our structure and business model

Structure

Carnival plc, together with Carnival Corporation, operate a dual listed company, whereby the businesses of Carnival Corporation & Carnival plc are combined through a number of contracts and through provisions in Carnival Corporation's Articles of Incorporation and By-Laws and Carnival plc's Articles of Association. The two companies operate as if they are a single economic enterprise with a single senior executive management team and identical Boards of Directors, but each has retained its separate legal identity. Carnival Corporation & Carnival plc are both public companies with separate stock exchange listings and their own shareholders. Carnival Corporation was incorporated in Panama in 1974 and Carnival plc was incorporated in England and Wales in 2000.

More information on the structure of Carnival Corporation & plc, including a full list of Carnival Corporation & plc's subsidiaries, can be found in our Annual Report (Form 10-K) available [here on our website](#). Carnival Corporation and Carnival plc are referred to collectively throughout this statement as "our", "we" and "us".

Operations

We are one of the world's largest leisure travel companies with operations in North America, Europe, Australia and Asia. We operate a portfolio of leading global, regional and national cruise brands that sell tailored cruise products, services and vacation experiences. Our portfolio of cruise line brands includes:

- [Carnival Cruise Line](#)
- [Princess Cruises](#)
- [Holland America Line](#)
- [Seabourn](#)
- [P&O Cruises \(Australia\)](#)
- [Costa Cruises](#)
- [AIDA Cruises](#)
- [P&O Cruises \(UK\)](#)
- [Cunard](#)

Together, these brands have a fleet of over 90 cruise ships (as at 30th November 2022) visiting over 700 ports around the world.

We operate in Australia and the United Kingdom through the Carnival plc arm of Carnival Corporation & plc. Carnival plc is registered in England with its registered office at Carnival House, 100 Harbour Parade, Southampton, SO15 1ST United Kingdom and is a registered foreign company in Australia with an Australian branch office located at 465 Victoria Ave, Chatswood, NSW 2067. Carnival plc’s UK operation represents group cruise brands in the UK and European markets, including Carnival Cruise Line, Cunard, Holland America Line, P&O Cruises (UK), Princess Cruises and Seabourn. Carnival plc’s Australian office represents seven cruise brands in the Australian and New Zealand market, including Carnival Cruise Line, Cunard, Holland America Line, P&O Cruises (Australia), P&O Cruises (UK), Princess Cruises and Seabourn.

b- Our supply chain

To provide unforgettable holiday experiences for our guests, we source significant quantities of goods and services from a vast global supply base. We currently work with over 20,000 suppliers, vendors, distributors, consultants, agents and any other third parties who do business with us or on our behalf (“Business Partners”) worldwide. Our supply base is diverse and many of our Business Partners provide goods and services across multiple brands within our portfolio of cruise brands.

Our global operations can be classified into three key areas:

| | | |
|----|--|---|
| 1. | People: Guests, Shore side (Offices and staff), Cruise Ships (Seafarers/ Crew) | Managed at local cruise brand level |
| 2 | Maritime: Fuel, Shipbuilding, Industry Compliance, Technology | Managed by Carnival Corporation & plc and at the local cruise brand level |
| 3 | Hospitality, Travel and Leisure: Food & Beverage, Hotel Supplies, Ship Furnishings, Travel Services, Entertainment, Tour Operations | Managed by Carnival Corporation & plc and at the local cruise brand level |

We are progressively developing a more comprehensive map of our supply chains, including the categories of products and services sourced and their geographic locations. During the reporting period we began a global mapping exercise which has provided us with additional visibility of our supply chain and this process will continue to be rolled out to additional Business Partners in 2023 and beyond.

Section 3: Our Code and Policies on modern slavery and human trafficking

We have a comprehensive set of policies and procedures in place that demonstrate our commitment to ethical conduct and respecting human rights. Our policies and procedures apply to all subsidiaries of Carnival Corporation & plc.

Our policies also play an integral role in our work to embed respect for human rights throughout our supply chain. They help us set clear expectations for our Business Partners, and they also establish a framework that helps us monitor compliance with our standards. We have established a series of core policies for our Business Partners that outline our commitment to human rights and explicitly prohibit the use of forced labour, child labour, and human trafficking in our supply chain. These are described in detail below.

Code of Business Conduct:

Our employees are subject to, and expected to follow, our Code of Business Conduct and Ethics (“Code of Conduct”). Our Code of Conduct requires employees to act with the utmost integrity when dealing with fellow employees, guests, global communities, government agencies, vendors, contractors, service providers, agents and other Business Partners. Our Code of Conduct explicitly condemns all forms of child exploitation and forced labour and sets out our commitment to complying with the international network of regulations intended to help prevent modern slavery and human trafficking. Any employee that has witnessed or has information regarding the exploitation of children, forced labour or human trafficking is required to report the situation immediately. Further information on reporting can be found in Section 6 below.

Our Code of Conduct, which is available to our employees on our intranet sites and publicly on our external websites, is provided to all new employees during the on-boarding process and is regularly promoted in emails and news articles posted on our intranet sites. In addition, our employees are required to complete a computer-based training course on our Code of Conduct every two years and pass the corresponding knowledge check.

Our Code of Conduct and the corresponding training course explicitly affirm our support for protecting human rights.

Business Partner Code of Business Conduct:

Our Business Partner Code of Business Conduct and Ethics (“Business Partner Code”) applies to all Business Partners. We expect our Business Partners to respect and follow applicable laws and regulations and to promote ethical decisions in all aspects of their business. Our Business Partner Code also recognizes the importance of maintaining and promoting fundamental human rights and serves as the foundation of our human rights commitments. It is available publicly on our cruise brands’ websites and our online Business Partner portals, as well as being communicated in contracts and standard terms and conditions with Business Partners.

Our Business Partner Code explicitly affirms our support for protecting human rights and reiterates our expectation on Business Partners to uphold our requirements.

Our contracts and standard terms and conditions require our Business Partners to comply with all applicable anti-slavery and human trafficking laws and codes. We also include a link to our

Modern Slavery Act Statement and incorporate an obligation on our Business Partners to commit to adopting practices that support the principles outlined therein.

Human Rights Policy:

We publish a global Human Rights Policy, in line with international law, agreements and guidelines including: the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the ILO's Core Labour Standards as codified in the eight core conventions.

Our Human Rights Policy is approved by our Board of Directors and embeds the responsibility to respect human rights throughout our operations and clarifies the responsibility of colleagues, ship and shore, to uphold our commitments to respect human rights, and outlines the core human rights standards we expect our Business Partners to uphold. It also outlines our due diligence procedures. Our Human Rights Policy is embedded into our Business Partner Code and is also incorporated in our Responsible and Sustainable Sourcing Policy (described below).

Our Human Rights Policy has been reviewed and revised alongside preparation of this statement to ensure alignment with regulatory developments and internationally recognized best practices.

Responsible and Sustainable Sourcing Policy:

During the reporting period we have developed our global Responsible and Sustainable Sourcing Policy ("RSSP") which provides guidelines and recommendations to help Business Partners meet our mandatory minimum requirements for compliance and progress towards industry best practice.

Each principle covered in the RSSP is supported by a separate detailed Supplier Standard ("Standard") outlining our approach to supply chain due diligence and describing how Business Partners are expected to put our minimum requirements into practice. The Standard on Labour and Human Rights outlines the principles we expect our Business Partners to meet, including: prohibiting human trafficking, forced and child labour; reinforcing the right to freedom of association; ensuring non-discrimination, lawful working hours and wages; ensuring safety and security of the working environment; and adopting appropriate grievance mechanisms.

The RSSP is also complemented by a Health and Safety Standard and an Environmental Protection Standard which further reinforce our commitments to human rights and our expectations of Business Partners.

The RSSP and associated Standards will be rolled out across our global operations in 2023 and beyond.

Section 4: Our approach to due diligence process

Due Diligence Questionnaire:

We take a risk-based approach to carrying out due diligence with new and existing Business Partners. If we detect any potential risks or non-compliance through the process, we may require the Business Partner to implement a remediation plan, or, in certain circumstances, we may suspend or terminate the business relationship and any related contracts.

Our due diligence questionnaire incorporates questions on compliance with modern slavery laws. Our Global Sourcing and Global Supplier Maintenance teams are working to implement a new vendor management system which will be capable of hosting our enhanced due diligence questionnaires to enable us to more effectively deploy our due diligence across our supply chain. This will be progressed during 2023 and will improve our visibility of potential modern slavery and human rights issues within our supply chain.

Building on Carnival UK's 2021 adoption of the Sedex platform, the world's largest data platform for supply chain assessment, we extended our membership in 2022 to cover our global operations. This extended membership facilitates collaborative work with our Business Partners to address modern slavery risk. We will combine our own internal due diligence process with the Sedex platform to store, analyse, share, and report on our global Business Partners' sustainability practices with respect to Human Rights.

The results of our due diligence efforts will inform updates to our policies and procedures in 2023 and beyond to further strengthen our approach to respecting human rights and addressing modern slavery risks.

Addressing recruitment risks:

In order to address modern slavery risks in our shipboard recruitment activities, we require Business Partners who provide crew recruitment and resourcing services (referred to as global talent partners) to be certified in line with the Maritime Labour Convention 2006 ("MLC"). The MLC establishes standards regarding the minimum working and living conditions of seafarers including:

- minimum requirements for seafarers to work on a ship, including minimum age requirements;
- conditions of employment;
- accommodation, recreational facilities, food and catering;
- health protection, medical care, welfare; and
- social security protection.

We also perform our own audits of these Business Partners on a regular basis, monitoring their job assignment processes, recordkeeping, pre-employment screening and post-employment follow-up. Detailed crew employment records are maintained in local recruiting offices and at our headquarters.

The minimum age of employment within our fleet is 21, with the exception of cadets in training who must be 18 or over.

Addressing fraudulent employment offer risks:

Although fraudulent employment practices are not part of our operations or our supply chain, we have taken a number of steps in an effort to reduce the risks of modern slavery and human trafficking associated with them. In particular, we have:

- Reported the activity to the relevant law enforcement agencies where appropriate and advised individuals to report to authorities in their home jurisdictions
- Reported the activity to the relevant regulators responsible for scams
- Worked with Facebook to expedite removal of fraudulent pages referencing our brands
- Created posts for brand careers social media sites to alert candidates to the risk of fraudulent adverts or job offers
- Placed notices on our 'careers' web pages advising that we do not send out unsolicited offers of employment and advising individuals not to respond to any emails or offers of this nature
- Reported or sought to deregister any email addresses or domains we believe are involved in distributing fraudulent employment offers
- Sent cease and desist notices to the email accounts associated with the fraudulent offers
- Advised affected individuals who have contacted us in relation to these fraudulent offers on how to report and respond to them.

Section 5: Risk assessment and management

a- Our own operations

Our shipboard and shoreside employees are sourced from over 100 countries. In the reporting period we had an annual average of approximately 60,000 employees onboard the ships we operated and approximately 10,000 employees and contractors across our shoreside operations.

We comply with the requirements of the MLC from the International Labour Organisation ("ILO") which sets minimum international standards for working and living conditions of seafarers. A complete overview of the applicable MLC standards in the cruise industry as well as specific standards across Carnival Corporation & plc can be found in our current sustainability report available [here on our website](#). We also maintain good relationships with relevant unions and work in partnership to ensure we comply with relevant national employment law requirements.

The recruitment of officers and crew for our shipboard positions presents the risk of modern slavery practices occurring and continues to be challenging due to intense competition for skilled labour in the maritime industry. To recruit strong candidates, we often partner with global talent partners to help us find the best talent, hiring the majority of our crew members through these employment agencies that act on our behalf. Though many nationalities are represented among our crew, we have worked with the same primary employment agencies in a number of countries including Indonesia, India, Vanuatu, and the Philippines for several decades.

We recognise that modern slavery risks are high in the jurisdictions from which our crew are recruited and are particularly conscious of the risks of human trafficking, child labour and other coercive practices in relation to the recruitment of individuals. We work closely with our global talent partners to reiterate and reinforce our requirements of Business Partners and our expectation of ethics and integrity.

We are aware of instances of unauthorised and fraudulent employment offers being made to individuals for positions onboard our ships via unconnected third parties. This involves unsolicited offers of employment, purportedly on behalf of our cruise brands, being published or circulated via email falsely advertising shipboard roles. In our experience, these emails or advertisements are generally directed towards jurisdictions with high unemployment rates and a prevalence of vulnerable workers. We are mindful that such fraudulent employment practices can be vehicles for human trafficking, servitude, or other exploitative practices. We are aware of some instances where individuals have been instructed to provide their passport and to pay an upfront 'fee' to the fraudulent recruiter. We continue to monitor this situation very closely and work with our employment agencies to address any issues that arise and highlight the risks to potential crew via our websites and social media pages.

b- Our supply chain

In the reporting period, we have built on the identification of the risks associated with the top spend Business Partners we identified previously and have extended our risk assessment process to wider sections of our global supply chain. We have enhanced our methodology to identify the parts of our global supply chain where human rights risks are highest and our approach will be further enhanced in 2023.

As we roll out the RSSP and the Standards, we plan to encourage our Business Partners to register on the Sedex online platform as it will enable them to share data and demonstrate their ethical business practices. When available, we will use information provided by Business Partners in the Sedex platform to inform our risk assessment and prioritise where to take action.

Section 6: Actions taken to prevent modern slavery and human trafficking

a- Own operations

Reinforcing reporting channels and obligations:

We have an independently administered Compliance Hotline and website available 24 hours a day, 7 days a week, which is regularly promoted to our employees. All reports to the Compliance Hotline are reviewed, with investigations and corrective actions being undertaken where appropriate. Compliance Hotline data is also analysed for trends, which give the company visibility and oversight of high frequency or systemic issues.

Our employees are required to report any violation of law or non-compliance with our Code of Conduct immediately to their local management team, our Global Ethics & Compliance Department, or through our Compliance Hotline. Reports can be made anonymously and we do not tolerate retaliation of any kind against those who make reports.

During the reporting period, we promoted the Compliance Hotline through the following activities:

- Displaying posters onboard our ships and in our corporate offices showing the Compliance Hotline telephone number and website and encouraging individuals to report concerns.
- Sending awareness messages to employees reminding them to speak up and report concerns through the Compliance Hotline (or other appropriate channels).
- Conducting regular testing to ensure the Compliance Hotline is functioning and can be reached from our ships and our offices.
- Introducing a new mobile 'QR Code' route to enable mobile reporting.

b- Our supply chain

We are aware that risks and impacts will vary across our global operations and associated supply chains. We expect that risks could include issues such as forced labour and human trafficking, amongst other social injustices. Additionally, that risk will also be influenced by a variety of factors, for example: location, industry, and culture. Given the size of our business, it is impossible to completely eradicate the risk of modern slavery. In order to be effective, we apply a risk based approach. We continue to develop our understanding of potential risks through education and due diligence, and by defining the most common and highest areas of risk within our global operations in order to focus next phases of activity where we can have the most impact.

Depending on risk profile, we use a number of different methods. Audits are one tool we have introduced in the reporting period to understand selected Business Partners' business practices, how they treat workers, and to verify compliance to legal requirements and our RSSP. We have adopted Sedex's audit methodology, SMETA, which is the most widely used social auditing methodology in the world, but also accept similar alternative protocols that Business Partners have gone through. Our ongoing adoption of audits will help us to see where issues are more serious and should be addressed first.

We understand that modern slavery and human rights issues are a complex challenge in global supply chains and that many issues are systemic in nature and cannot be addressed alone. Consequently, we encourage Business Partners to proactively disclose to us where they are having challenges meeting required standards, so we can work together to address issues, strengthen management systems and implement remediation solutions.

We encourage anyone in our supply chain and communities we interact with, who becomes aware of any actual or potential violation by any Business Partner of our RSSP, associated

Standards, or our Business Partner Code, or any applicable law, or other misconduct, to immediately report such conduct using our Compliance Hotline. We take steps to communicate details of our Compliance Hotline to Business Partners and reiterate our expectation that individuals should 'Speak Up' to report concerns.

During the reporting period, we have also made available to all our Suppliers the email address RSSP@Carnival.com to raise any concern they may have in relation to the implementation of our RRSP and its associated Standards.

Equally, we encourage our Business Partners to provide a grievance mechanism via which affected workers or rightsholders can raise complaints or concerns.

Should it become apparent at any point that we have caused or contributed to a human rights violation, in our operations or via a Business Partner, an investigation will be conducted, and remediation processes implemented. Our Global Ethics & Compliance Department will monitor the investigation and remediation process.

Section 7: Training and awareness on modern slavery and human trafficking

Carnival wide training:

All employees are required to complete ethics training courses to help them understand our expectations, and the importance of conducting business in an ethical and responsible manner. This training incorporates specific education on modern slavery risks and directs employees and crew on how to identify and raise concerns

In addition to the training module referenced, we also publish materials to educate employees on how to report concerns of wrongdoing, and to reiterate the support that will be provided to those who do raise concerns.

Procurement training:

We continue to support our supply chain and procurement teams to understand the risks of modern slavery in our supply chain. We are currently reviewing our training approach for our supply chain and procurement teams in order to support the roll out of our RSSP and associated Standards. We intend to deliver targeted training on modern slavery risk and human rights protection as part of our future training programme.

Business Partner Training:

In order to build on supplier engagement activities undertaken by Carnival UK previously, we plan to develop a training approach that will ensure our Business Partners are aware of their role in supporting us to deliver our commitments to ensure protection of human rights and to combat modern slavery in our operations and our supply chains. The information and insights gained through our risk assessment and auditing program will be used to help inform the development of further human rights guidance for our Business Partners and training interventions if relevant.

We are committed to complement our ethical audits program with capability building to support our Business Partners with continuous improvement focus on human rights, in support of the roll out of our RSSP and associated Standards.

Section 8: Our effectiveness and performance indicators

We are committed to the continuous improvement of our response to modern slavery risks in our operations and supply chains. We recognise the importance of measuring and assessing the effectiveness of our actions to enable us to continue to revise and refine our approach to such risks.

Analysing trends in our reporting channels:

We regularly analyse and report on trends in our hotline reporting data to provide visibility of high frequency or systemic issues. During the reporting period, we reported no complaints related to modern slavery practices or concerns within our operations or supply chains.

Monitoring training completion:

We regularly monitor and track our completion rates of ethics training courses assigned to our workforce. This training is essential in maintaining our strong culture of ethics and compliance. Our Board of Directors is provided with a regular overview of training completion rates.

Auditing our employment agencies:

During the reporting period, we performed several audits on our employment agencies to assess their compliance with job assignment processes, record keeping, pre-employment screening and post-employment follow-up.

Tracking our due diligence processes:

As we continue to enhance our due diligence, audit and remediation processes, we intend to develop a more structured approach to measuring effectiveness of these programs. We anticipate our abilities to track the progress of these programs will mature over time, in particular through our global membership of SEDEX which will enable us to utilise their tools and insight to support our approach as outlined above.

Section 9: Looking ahead to 2023


In 2023, we will continue to implement our human rights and modern slavery program globally. We will collaborate with external expert organizations to identify ways our company can advance its contributions to combating modern slavery and work with the broader tourism industry on efforts to address human rights issues within our shared supply chain. We will also continue to evaluate the effectiveness of our policies, operating procedures and Business Partner guidelines to comply with all relevant laws.

Section 10: Governance and stakeholders' engagement

This Statement has been made on behalf of Carnival plc in consultation with Carnival Corporation & plc's corporate headquarters based in Miami, United States, and stakeholders across accountable business areas.

It has been reviewed and approved by our President, Chief Executive Officer and Chief Climate Officer on 19 April 2023 and Carnival Corporation & plc's Board of Directors on 19 April 2023.

Signed by Josh Weinstein:


President, Chief Executive Officer and Chief Climate Officer
Carnival Corporation & plc
19 April 2023