



This statement, pursuant to Australia’s Modern Slavery Act 2018 and the United Kingdom’s Modern Slavery Act 2015, sets out the actions taken by Carnival Corporation and plc to address the risks of modern slavery and human trafficking in our operations and in our supply chains over the financial year ending 30 November 2021 (“the reporting period”).

## **Carnival Plc’s structure, operations and supply chains**

### Structure

Carnival plc, together with Carnival Corporation, operate a dual listed company, whereby the businesses of Carnival Corporation and 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 and 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 and Carnival plc, including a full list of Carnival Corporation and Carnival 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”.

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

### 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 95 cruise ships (as at 30<sup>th</sup> November 2021) visiting over 700 ports around the world.

Our company operates in Australia and the United Kingdom through the Carnival plc arm of Carnival Corporation and 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.

### Supply Chains

To provide unforgettable holiday experiences for our guests, we source significant quantities of goods and services from a vast global supply base. During our pre-pandemic operations, we worked with over 20,000 business partners worldwide, managed by our supply chain and sourcing teams. 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:

<b>1</b>	<b>People:</b> Guests, Shore side (Offices and staff), Cruise Ships (Seafarers/ Crew)	Managed at local cruise brand level
<b>2</b>	<b>Maritime:</b> Fuel, Shipbuilding, Industry Compliance, Technology	Managed by Carnival Corporation and plc’s ‘All Brands Group’ and at the local cruise brand level
<b>3</b>	<b>Hospitality, Travel and Leisure:</b> Food & Beverage, Hotel Supplies, Ship Furnishings, Travel Services, Entertainment, Tour Operations	Managed by Carnival Corporation and plc’s ‘All Brands Group’ 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. In support of this effort, Carnival plc have recently become a member of SEDEX, one of the world's leading ethical trade membership organisations supporting businesses to operate ethically and sustainably and fight modern slavery.

### COVID-19 Impacts

2021 was another challenging year for us as we continued to navigate ongoing and significant impacts on our business from the effects of COVID-19, alongside the gradual return of our fleets to guest cruise operations. As of January 13 2022, eight of our nine brands, or 67% of capacity, had resumed guest cruise operations. We expect to have our full fleet back in operation by the end of 2022. Over the last financial year and beyond, we have continued to work closely with health and medical experts, as well as authorities globally and nationally, to ensure comprehensive health and safety protocols are in place for protection against and mitigation of COVID-19 across the entire cruise experience for all of our nine brands. This includes cross-industry learnings and best practices based on the proven health and safety record of industry-wide sailings, and input from top scientists and public health, epidemiological and policy experts. Protocols have been and will continue to be updated based on evolving scientific and medical knowledge related to mitigation strategies.

During the COVID-19 crisis and throughout the period of our gradual return to guest cruise operations, we have continued to focus on the health and well-being of our shipboard employees, including through the continuation of mental health wellness programs designed to enhance the conditions on our ships both in lay-up and in guest operations. We have also adapted protocols on board in response to new COVID-19 variants in order to ensure the health, safety and wellbeing of all on board, and the mental health and wellbeing provision has been a central factor in how we have implemented these protocols. We have implemented processes for the sharing of best practice initiatives throughout our brands and we continue to monitor the success of these programs and adapt measures as required. We have listened and responded to concerns raised by our shipboard employees through several channels, including our Compliance Hotline (see below for further details).

We have reinstated much of our supply chain and sourcing activities as demand for goods and services has increased in line with our return to guest operations.

## **Potential modern slavery risks in our operations and supply chains and of the entities we own/control**

### **Our Operations**

Our shipboard and shoreside employees are sourced from over 100 countries. In the reporting period we had an annual average of 30,000 employees onboard the ships we operated and 9,000 full-time and 1,000 part-time/seasonal employees in our shoreside operations.

We comply with the requirements of the Maritime Labour Convention 2006 ('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 and 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 is particularly 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, our company has 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 exist 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.

#### Fraudulent Employment Offers

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.

#### Our Supply Chain

Carnival plc recognise that modern slavery is an ongoing and growing global issue, which can potentially affect all of our operational areas and associated supply chains. Through the development of our approach, we intend to follow the United Nations Guiding Principles on Business and Human Rights (UNGPs) on how to identify risk, prevent, address and remedy human rights abuses.

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. We continue to develop our understanding of potential risk by being mindful of this and by defining the most common and highest areas of risk within our global operations, enabling us to better understand impacts and identify appropriate next phases of activity.

We are in the process of identifying the risks associated with our supply chains and have begun a review of the top spend business partners across our organisation; this work will be progressed over the course of 2022 as more of our fleets return to operation, and this will also be further supported via our SEDEX membership. We recognise our responsibility to take appropriate action across all areas of our operations and associated supply chains and are committed to the

continuous improvement in our approach. Additionally, we recognise the importance of measuring and assessing the effectiveness of our actions, enabling us to continue to refine our approach as we become fully operational in 2022.

## **Actions that Carnival plc has taken to assess and address potential modern slavery risks**

### **Enhancing our Culture**

Our Vision Statement sets out our commitment to doing the right thing and to upholding ethics and integrity:

*“At Carnival Corporation & plc, our highest responsibility and top priority is compliance, environmental protection and the health, safety and well-being of our guests, the people in the communities we touch and serve, and our shipboard and shoreside employees. On this foundation, we aspire to deliver unmatched joyful vacations for our guests, always exceeding their expectations and in doing so driving outstanding shareholder value. We are committed to a positive and just corporate culture, based on inclusion and the power of diversity. We operate with integrity, trust and respect for each other -- communicating, coordinating and collaborating while seeking candor, openness and transparency at all times. And we aspire to be an exemplary corporate citizen leaving the people and the places we touch even better.”*

Our ‘Culture Essentials’ are six behaviours that we have adopted to strengthen our culture of integrity and compliance; they are: Speak Up, Respect and Protect, Improve, Communicate, Listen and Learn and Empower. These, along with our Vision Statement, set out our expectations for team members to behave ethically and in compliance with applicable laws and regulations in the jurisdictions in which we operate, including laws prohibiting modern slavery and human rights violations.

To drive leadership accountability and ‘tone at the top’ in support of our culture, our senior leadership team have signed up to specific commitments to communicate and promote the priorities of the Company’s Vision Statement and the key behaviours within our Culture Essentials during 2022 and beyond. These leadership commitments will be overseen by our Board of Directors.

### **Continued Strengthening of our Ethics and Compliance Department**

Our Ethics and Compliance Department leads the effort to promote a strong culture of compliance and further develop our ethics and compliance governance function throughout the company. This function which includes leadership in our central ‘All Brands Group’ operation and in each of our operating companies incorporates compliance risk management, compliance training programs for our employees, oversight of investigations and efforts to strengthen our Company culture.

Our Chief Ethics and Compliance Officer, a member of the executive leadership team reporting to our Chief Executive Officer, leads the effort to promote a strong culture of compliance and

further develop our ethics and compliance governance function throughout the Company. To ensure appropriate focus and priority on ethics and compliance, the Compliance Committee of the Board of Directors oversees the Ethics and Compliance Department's function, maintains regular communications with the Chief Ethics and Compliance Officer and ensures implementation of the Ethics and Compliance function's Strategic Plan.

During the course of 2020-2021 the Ethics and Compliance Department worked with the business to support and monitor completion of the objectives set out in the 2020-2021 Ethics and Compliance Interim Strategic Plan which was put in place in response to the COVID-19 crisis.

During the reporting period, the Ethics and Compliance Department developed and published its mission statement and primary goals.

Ethics and Compliance Department Mission Statement:

*"To support Carnival Corporation and plc by assessing, monitoring and reporting on material compliance risks to drive awareness and strategic improvements of the priorities within the Vision Statement and the behaviors within the Cultural Essentials."*

Ethics and Compliance Department Primary Goals:

- 1. Effectively monitoring the key compliance risks, as well as the efforts of the Corporation and its leaders to financially support, further develop, and fully implement the top priorities set out in the Corporate Vision Statement and to promote the key behaviors set out in the Culture Essentials; and*
- 2. Driving continuous improvements consistent with the priorities set out in our E&C Mission Statement.*

Following completion of the activities contained in the Interim Strategic Plan, an updated Strategic Plan was devised and published to outline how the Ethics and Compliance Department will deliver against its primary goals during the course of 2022 and beyond. The Strategic Plan has been endorsed by the Board of Directors and the Leadership Teams at All Brands Group and each of the Operating Companies and, among many other priorities, contains the following specific actions which will further strengthen our ability to proactively support human rights:

- Evaluate current ethics and compliance policies and roll out any revised policies as required to ensure alignment with legal and regulatory requirements.
- Continue to review and enhance business partner due diligence processes, including issuing of updated due diligence questionnaires.
- Undertake business partner education and training engagement.
- Identify specific supply chain risk through compliance risk assessment process.

Our Ethics and Compliance framework creates a strong foundation which enables us to recognise and progressively remediate the risks of modern slavery in our operations and our supply chain.

Strengthening Policies and Procedures

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 and plc.

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 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.

During the reporting period, we issued a revised version of our Code of Conduct which more explicitly affirms our support for protecting human rights. The corresponding training course on the Code of Conduct was updated at the same time and all employees across the organisation were required to reaffirm their commitment to the Code of Conduct, by completing the updated version of the training course.

We also expect our business partners to respect and follow applicable laws and regulations and to promote ethical decisions in all aspects of their business. These requirements are documented in our Business Partner Code of Conduct and Ethics (“Business Partner Code of Conduct”). Our Business Partner Code of Conduct prohibits any use of forced labour, human trafficking or child exploitation in our supply chains. It is available publicly on our cruise brands’ websites and our online business partner and travel agent portals, as well as being communicated in our contracts and standard terms and conditions with business partners.

During the reporting period, we issued a revised version of our Business Partner Code of Conduct to more explicitly affirm our support for protecting human rights and reiterate our expectation on Business Partners to uphold our requirements.

We have recently published our global Human Rights Policy, which is overseen by our Board of Directors and embeds the responsibility to protect human rights throughout the Company and clarifies the responsibility of colleagues, ship and shore, to uphold our commitments in this area. During 2022 we plan to promote the Human Rights Policy through a series of communications and education tools, which will underline the responsibility that each of our colleagues has for upholding our commitment to ensuring that we have a positive impact on human rights. We will

also incorporate reference to the Human Rights Policy into business partner communications and briefings, in order to set out our requirement for business partners to uphold our commitments.

#### 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 and business partners. All reports to the hotline are reviewed, investigations and corrective actions being undertaken where appropriate. 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 Compliance Department, or through our Compliance Hotline. Our business partners are also strongly encouraged to report any concerns to our Compliance Hotline or their local business contact. Reports can be made anonymously and our company does not tolerate retaliation of any kind.

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.
- Communicating details of our Compliance Hotline to business partners and reiterating our expectation that individuals should 'Speak Up' to report concerns.

#### Increasing training and awareness

We continue to deliver training to our supply chain and procurement teams on the risks of modern slavery in our supply chain. In addition to this targeted training for supply chain and procurement, all employees are required to complete ethics training courses to help them understand the Company's expectations, and the importance of conducting business in an ethical and responsible manner, and we include specific education on modern slavery risks in this general training.

During the reporting period we have developed and launched a campaign of 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. This was promoted via a message from our CEO to reinforce top leadership support for those who Speak Up.

#### Strengthening business partner contractual terms and conditions

During the reporting period, we strengthened our contracts and standard terms and conditions to explicitly require our business partners to comply with all applicable anti-slavery and human trafficking laws and codes. We also included a link to our Modern Slavery Act Statement and



incorporated an obligation on our business partners to commit to adopting practices that support the principles outlined therein.

We have also strengthened the explicit requirement on business partners to comply with our Business Partner Code of Conduct, which condemns all forms of modern slavery and requires our business partners to know and comply with applicable employment laws.

We communicated our updated requirement through our online business partner and travel agent portals and through business partner engagement activities.

#### Undertaking due diligence

We require our business partners to complete a due diligence questionnaire, and we reserve the right to decline to enter or continue business with any business partner who fails to meet our standards.

During the reporting period, we updated our existing due diligence questionnaire to incorporate questions on compliance with modern slavery laws. Our Global Supplier Maintenance Team plans to implement a new vendor management system which will be capable of hosting our enhanced due diligence questionnaire, this will be implemented in 2022 and will improve our visibility of potential modern slavery and human rights issues within our supply chain.

#### Addressing recruitment risks

In order to address modern slavery risks in our shipboard recruitment activities, we require our employment agencies to be certified in line with the Maritime Labor 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.

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

We also perform our own audits of these agencies 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.

#### 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 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.

#### Other initiatives

During the reporting period, Carnival plc in the United Kingdom continued work to roll out and embed its Ethical and Responsible Sourcing Standard (the 'Standard').

The Standard sets out our expectations for the fair treatment of workers and communities connected to our key Hospitality, Travel and Leisure supply chains. These expectations are based on the Ethical Trading Initiative's 'Base Code', on good labour standards and the fair treatment of workers and communities connected to the supply chain, which in turn is founded on the conventions of the International Labour Organisation.

During the reporting period we updated our standard terms and conditions to require our business partners to work with us to uphold the Standard. We also held several supplier conferences to continue to engage relevant business partners with the Standard and we plan to hold these on an ongoing basis through 2022 and beyond.

As we continue to roll out of the Standard we are developing a more comprehensive map of our UK supply chain, by building data and insights on the categories of products and services sourced, their geographic locations and business partners' due diligence practices. We are doing this through a business partner questionnaire and indicator led approach. Through this process we plan to use insights to set a more formal benchmark for determining risk, build a risk management framework that will enable us to plan next phases of activity, and better monitor and govern risk, and work towards preventing, addressing, and remedying key issues.

Carnival plc in the United Kingdom continues to provide insights on the roll out of the Standard to other parts of our organisation and are reviewing opportunities to extend the Ethical and Responsible Sourcing Standard to our other locations, with Carnival plc in Australia planning to commence development of the Standard in its location in 2022 as a next step.

### **Carnival Plc's Key Performance Indicators and effectiveness measurements**

Carnival plc is 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.

#### 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 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 membership of SEDEX which will enable us to utilise their tools and insight to support our approach.

### **Process of consultation with any controlled entities**

This Statement has been made on behalf of Carnival plc in consultation with Carnival Corporation and plc's 'All Brands Groups' headquarters based in Miami, United States. It has been reviewed and approved by our Chief Executive Officer on 9 April 2022 and Carnival Corporation and plc's Board of Directors on 9 April 2022. Going forward, in view of our global operations, we plan to implement a more extensive consultation process across Carnival Corporation and plc as we develop a more comprehensive map of our supply chain.



Signed and Dated by Arnold Donald