

Carnival Corporation & plc

Summary of the Anticorruption Policy & Guidelines

Carnival's Anticorruption Policy and Guidelines are designed to ensure the company's compliance with various anticorruption laws. The Policy imposes two important responsibilities on third parties that act on behalf of Carnival or one of Carnival's subsidiary companies:

- (1) Third parties shall not take part in giving a government official anything of value if done to secure an unlawful advantage, induce the official to act or fail to act according to his lawful duty, or influence a discretionary decision to be made by the government official.
- (2) All third party books and records pertaining Carnival in any way must be maintained in a complete and accurate manner. "Off the books" accounts and false/misleading entries are strictly forbidden. This applies to all invoices, supporting documents, and reimbursement requests filed by third parties with Carnival or a subsidiary.

Carnival's Anticorruption Guidelines provide specific guidance for handling situations that present a heightened risk for corrupt activities. Third parties encountering the following situations should contact Carnival or the relevant Carnival subsidiary for advice prior to acting:

- Third party seeks to hire or enter into a business relationship with government officials, their family members, business associates, or companies in which these persons have an interest.
- Third party plans transactions with entities that involve a foreign government official with responsibility for decisions specifically affecting Carnival, or with any high-ranking foreign government official, their family members, business associates, or companies.
- Third party enters a business relationship with a government owned or controlled company.
- Third party seeks to provide a payment that is not required by published fees to a government official for the purpose of securing or expediting a routine government service.
- Third party wishes to provide gifts, meals, or travel-related benefits to government officials.
 - Third parties should never provide gifts of cash, other monetary instruments, jewelry or other luxury items for personal use to government officials or related persons. Likewise gifts or entertainment linked to official action or influence cannot be provided to government officials or related persons.
- Third party wishes to make a payment (whether in cash or in kind) to a foreign political party, party official, and/or candidates on an issue affecting Carnival's business.

Other situations may also invoke activity that could be perceived as corrupt. Third parties are encouraged to request guidance whenever circumstances indicate that an activity could involve or be perceived to involve an improper payment. Third parties must decline any request by a government official for a direct or indirect payment of cash or something of value that is or could be perceived as improper in nature.

Third parties are encouraged to report perceived or potential wrongdoing and/or illegal activity to Carnival or a Carnival subsidiary. Confidentiality will be protected to the fullest extent possible, and good faith reports will be handled in a manner that protects reporting parties from retaliation of any kind.

Third parties who wish to review the Policy and the Guidelines in their entirety should request such documents from Carnival or a subsidiary. Questions should be directed to the Carnival Legal Department or the subsidiary legal department. For advice on how to properly account for benefits covered by the Policy or the Guidelines, third parties should consult with Carnival or Carnival subsidiary finance or compliance personnel.