



Supplier Code of Conduct

Introduction

Virgin Voyages aims to be a leader in the cruise industry. Our vision is to create an Epic Sea Change for All. In pursuit of this ambition, we understand the importance of building strong relationships with partners and suppliers throughout the value chain and aligning on a set of core principles that uphold internationally recognized standards¹ to protect human rights and the environment.

The following code outlines Virgin Voyages' commitments and expectations to ensure business is conducted ethically and responsibly. At a minimum, we require our partners and suppliers to: 1) comply with all applicable laws and regulations where they do business; 2) adhere to the principles set forth in this code; and 3) cascade these principles throughout their supply chains and seek continuous improvement.

Virgin Voyages will use the principles set forth in this code to guide supplier and partner decisions and may require suppliers to complete assessments against the principles to monitor and demonstrate compliance. Additionally, Virgin Voyages will engage suppliers to support their understanding and compliance with this code and reserves its right to discontinue contracts for non-compliance. Together we look forward to pursuing joint initiatives that will advance positive change in the world.

Erin Williams

Chief Financial Officer

¹ **International Labor Organization Declaration on Fundamental Principles and Rights to Work**

<https://www.ilo.org/declaration/lang--en/index.htm>

United Nations Universal Declaration of Human Rights

<http://www.un.org/en/universal-declaration-human-rights/>



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Our Principles

Ethics & Integrity

- Avoid participation in, or knowingly benefit from, any kind of corruption, extortion, bribery, acts of violence or terrorism.
- Refrain from offering, directly or indirectly, any payment, gift or other advantage to a Foreign Public Official with the intention of influencing them and obtaining or retaining an unfair advantage in the conduct of business.
- Always act in compliance with, and refrain from violating, the United States Foreign Corrupt Practices Act, the U.K. Bribery Act and any other applicable anti-bribery laws pertaining to their business.
- Conduct business with the highest level of integrity and in an ethical manner, consistent with company policies and lobbying activities related to labor, human rights, climate change and environmental protection.

Privacy

- Protect reasonable privacy expectations for personal information including suppliers, customers, consumers, and employees.
- Comply with all applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

Fair Labor Practices

- Refrain from using or benefiting from involuntary labor. All employees shall enjoy the freedom of movement during the course of their employment. Personal identification or employment documents and payment of compensation must not be withheld.
- Provide training for appropriate workers on modern slavery² issues and how to identify and respond in a timely and safe manner.
- Provide and explain employment contracts, policies, procedures in an accessible way to ensure employee understanding.
- Pay wages and provide benefits that comply with legal minimums and meet or exceed the industry standard.
- Comply or exceed industry standards on working hours and offer employees appropriate time off and rest.
- Respect the rights of employees to associate freely, join or not join trade unions and/or workers councils, or engage in collective bargaining, in accordance with national law and international conventions.
- Provide an anonymous complaint mechanism for workers to report workplace grievances.

² **What is Forced Labor, Modern Slavery, and Human Trafficking**
<https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>

Anti-Discrimination and Human Rights

- Adopt anti-discrimination practices and policies that ensure equal treatment in recruitment, hiring, compensation, working hours, access to training, employee benefits and services, promotion, termination and retirement, irrespective of age, gender, race, color, disability, religion or belief, language, national or social origin, trade union membership, sexual orientation or any other status recognized by international law.
- Have policies and procedures in place that protect employees from inhumane treatment, harassment and abuse.

Abolish Hazardous Child Labor

- If children under the age of 18 are legally employed (as stipulated in the International Labour Organization (ILO) C138 Minimum Age Convention), suppliers must take care to ensure they work in safe conditions. We expect our suppliers to work towards eliminating child labor in their own business and that of their supply chain.³

Health and Safety

- Maintain an effective health and safety management system that is regularly reviewed and updated to ensure:
 - Safe working conditions
 - Emergency preparedness
 - Identification and management of hazards and risks associated with operations
 - Compliance with applicable laws and regulations
- Continuously work to minimize the incidents of workplace injury and illness, including the provision of education, training and protection of all employees from any harm that could arise from workplace activities.

Environmental Protection

- Maintain an effective environmental management system that is regularly reviewed and updated to:
 - Identify environmental risks and impacts from direct operations and supply chain
 - Monitor, measure, report and minimize environmental impacts
 - Ensure safe handling, storage and responsible disposal of chemicals, hazardous waste and toxic materials
 - Comply with all local, national, international and supranational environmental regulations and directives and have in place systems to monitor compliance.
- Implement cost effective measures to continuously work to minimize emissions, energy, waste and water consumption in operations.

³ **International Labour Organization (ILO) C138 Minimum Age Convention**
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138



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- Avoid the use of non-recyclable materials, and single-use plastics in products and packaging.
- Avoid destruction of natural habitats of endangered species.

Responsible Sourcing Guidelines

- Comply with the Virgin Voyages Ethical Sourcing & Merchandising Guidelines where applicable to the products/services being provided to Virgin Voyages – in the case of any ambiguity, please adhere to the Virgin Voyages Ethical Sourcing & Merchandising Guidelines.

Supplier Engagement

- Conduct supplier tendering and assessments in a fair and honest manner, with openness and integrity.
- Promote the principles of diversity and inclusion.
- Maintain documentation necessary to demonstrate compliance with this code.
- Engage suppliers with the principles in this code and support their compliance.
- Notify Virgin Voyages of any non-compliance with this code anonymously and confidentially through a third-party platform called EthicsPoint. Reports may be made by calling (833) 620-6812, or by visiting virginvoyages.ethicspoint.com.
- Reserve the right to discontinue contracts for noncompliance.

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We ask all suppliers to confirm that they have read, understand and meet the expectations contained within this code.

Signed.....

Date.....

Company.....

Position.....