



MSC CRUISES
CODE OF BUSINESS CONDUCT

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FOREWORD

FROM MSC CRUISES EXECUTIVE CHAIRMAN

After years of strong growth, MSC Cruises is today the world's largest privately-owned cruise company and the leading brand in a number of key markets globally. Under its ambitious industry-unprecedented €10.5 billion investment plan, the fleet is set to expand to 24 mega-cruise ships by 2026.

We have accomplished this in a relatively short period of time, by providing outstanding service to our guests and by always conducting our business responsibly and with the outmost integrity. This must remain a key element of how we conduct business for years to come.

MSC Cruises has developed core values that constitute the principles guiding our activities and the way we deal with stakeholders, business partners, Employees and guests.

These core values should also guide the conduct of all Employees of MSC Cruises in their interactions with each other whether on shore or on board. MSC Cruises' core values are:

- We are a family company
- We are in continuous evolution
- We believe in equal opportunities
- We have passion
- We care for people

Within the framework of the Core Values, this MSC Cruises Code of Business Conduct provides a set of mandatory guidelines to help our Employees conduct all business operations ethically. As such, implementing it and ensuring that all our Employees adhere to it is a top priority for our company. Above all, the Code affirms the principles by which we do business and therefore applies to all MSC Cruises Employees, onshore and on board. It notably sets common standards for all our operations globally.

All Employees are requested to carefully read these pages, and to revisit them whenever they are in doubt. By applying the Code in our daily work, we will remain true to the ethical principles that are at the heart of our business.

Sincerely,
Pierfrancesco Vago
Executive Chairman

GLOSSARY

The terms defined in the glossary are only applicable to this Code.

Active Bribery	means any action to, directly or indirectly, offer, promise or give to any person of the private sector an undue advantage, in order to cause that person to carry out or fail to carry out an act in connection with his or her professional or commercial activity which is contrary to his or her duty or dependent on his or her discretion.
CLIA	means the Cruises Lines International Association.
Code	means the latest version of MSC Cruises Code of Business Conduct.
Confidential Information	means all non-public information in MSC Cruises' possession related to business, including, but not limited to, contracts, pricing information, marketing plans, trade volumes, customer's identity, trade secrets and any other information of commercial value to any other person, communicated by any means, including oral and/or electronic means, whether or not marked, designated or otherwise identified as "confidential".
Conflict of Interest	means a situation when an Employee conducting business for and/or on behalf of MSC Cruises has private interests that may interfere with the interests of MSC Cruises in such a way that creates a risk that his or her decisions could be affected by the private interest or otherwise could alter the performance of his or her duties on behalf of MSC Cruises.
Corporate Hospitality	means any benefit in kind, event, service or entertainment MSC Cruises hosts or provides, or Employees attend or benefit from, for business-related purposes. Common examples include reasonably priced meals, travel and accommodation, sporting events, theatrical performances and educational events.
Corruption	means the action of offering, promising or giving a Government Official, directly or indirectly, an advantage which is not due to him, in order to cause that Government Official to carry out or to fail to carry out an act in connection with his official activity which is contrary to his duty or dependent on his discretion.

Employee(s)	means employees, representatives, officers and directors of MSC Cruises, as defined hereafter; including but not limited to MSC Cruises' ship management, crewing companies, and owned sales agents, as well as Crewmembers and onboard personnel of MSC Cruises' ships.
Facilitation Payment	means any payments or advantages of any kind made with the purpose of expediting or facilitating the performance by a Government Official of a routine governmental action.
Gift	means anything of value in relation to MSC Cruises business.
Government Official	means a person: (i) serving with, employed by or acting as an agent of any agency or entity of the national, state or municipal governments of any country; (ii) serving with, employed by or acting as an agent of any public international organization (such as the World Bank or the United Nations); (iii) working in any government-owned or government-controlled commercial enterprise; (iv) working in a political party; (v) running as a candidate for a political office.
Misconduct	means any unlawful or improper behavior that is undertaken by an Employee, including a breach of the Code.
MSC Cruises	means MSC Cruises S.A., located at Avenue Eugène-Pittard 40, 1206 Geneva, Switzerland and/or its subsidiary companies.
Passive Bribery	means the action of an Employee, directly or indirectly, to solicit, accept, or receive an undue advantage for his or her own benefit or for the benefit of a third person for the commission or omission of an act in connection with his or her professional or commercial activity which is contrary to his or her duty or dependent on his or her discretion.



1. INTRODUCTION

OBJECTIVE AND SCOPE

As an international cruise line company, MSC Cruises earns its reputation and trust everyday by providing unparalleled services to its guests and by conducting business fairly and ethically. Our reputation for trust and integrity relies also upon every action by every Employee every day.

The Code is a guideline to help Employees to run business ethically. The Code sets forth the common standard of approved behaviour, regardless of the location of the Employee. These standards supplement and may go well beyond compliance with laws and regulations in many countries where MSC Cruises operates.

All Employees on shore or on board shall adhere to the Code. The Employees onboard are also bound to abide by the specific code of conduct issued by the ship management company.

The Code must be read in conjunction with other policies and procedures MSC Cruises may adopt for the purpose of implementing the Code's principles throughout MSC Cruises as well as other policies. Where differences exist as a result of local laws or regulations, the Code, the additional principles and policies, or the local requirement, whichever sets the highest standards of ethic, must be applied.

MSC Cruises also reserves the right to amend the Code as deemed appropriate. Employees should keep themselves informed and aware of any updates. The latest version of the Code can be found on Ethic and Compliance section of MSC Connect: [MSC Connect>About MSC>Our Group>Ethics and Compliance](#) and on MSC Cruises' website msccruises.com.

RESPECTIVE RESPONSABILITIES

Each Employee is responsible and accountable for understanding and meeting the standards described in this Code. Moreover, additional responsibilities lie with any Employee who is responsible for supervising others to:

- Act as a role model in strict compliance with the letter and spirit of the Code;
- Ensure that all Employees under their supervision have been made aware of and have been trained on how to apply the Code;
- Supervise and monitor the observance by their staff of the principles laid down in the Code;
- Stop any conduct breaching the Code and report the conduct to MSC Cruises' Corporate Compliance Officer, Advisory and Audit Department, or Corporate Legal Department at hotline@msccruises.com or submit a report to <https://mscsppeakupline.com/>.

CONSEQUENCES OF NON-COMPLIANCE

Any failure to comply with the Code may lead to disciplinary actions up to and including termination of employment or any other contract in accordance to the disciplinary rules applicable by the competent company of the Group, as well as possible civil or criminal penalties.

INTERPRETATION OF THE CODE

The purpose of the Code is not to cover all circumstances or anticipate every situation that may arise. Instead, it sets forth the principles and policies for the conduct of MSC Cruises' business in an ethical manner. When encountering situations not addressed specifically by this Code, Employees should maintain the highest ethical standards observed in the industry. If an Employee is unsure whether their conduct would be contrary to the Code, they should ask themselves some simple questions:

- Is this action lawful and in compliance with the Code?
- Would it be harmless to MSC Cruises or to me if this conduct was known?
- Would I want my actions to be published on the front page of a newspaper?
- Would I want someone to act the same way towards me?

If the answer to any of these questions is "no", the action is deemed not compliant with the Code and should not be taken. If you are unsure of the answer, then you should address to MSC Cruises' Corporate Compliance Officer, Advisory and Audit department, Corporate Legal Department or write to hotline@msccruises.com.

Where appropriate, words in the singular shall include the plural and vice versa. Unless the context otherwise requires, a reference to masculine shall include a reference to feminine.

ASKING A QUESTION AND REPORTING MISCONDUCT

The MSC Cruises Corporate Compliance Officer, Advisory and Audit department, as well as Corporate Legal Department, are responsible for implementing the Code and will answer any question Employees may have regarding the Code. Such questions can be addressed either in person or by sending an e-mail to hotline@msccruises.com.

If you suspect you have experienced or witnessed a Misconduct or a situation non-compliant with the Code, you must report to MSC Cruises Corporate Compliance Officer, Advisory and Audit Department, you can share your concern at <https://mscsppeakupline.com/>, or you can send an email to hotline@msccruises.com as soon as possible.

When reporting Misconduct, Employees may choose to identify themselves, or to remain anonymous. There will be no retaliation against any Employee making a report in good faith.

MSC Cruises takes alleged violations very seriously and will fairly investigate each allegation.



2. ENVIRONMENT

Onshore and onboard, MSC Cruises is committed to reducing its impact on the environment, the seas and oceans that it sails and complies with all applicable laws and regulations in the countries in which it operates, especially those relating to environmental protection.

Furthermore, through different projects, investments and initiatives, MSC Cruises is truly engaged in preserving the marine environment and relies on sound environmental practices to ensure protection of the environment. Below are some examples:

- **Ultra modern fleet**

MSC Cruises recognises the importance of investing in innovative ship technology to preserve the environment. MSC Cruises' priority is therefore to design and build a fleet that meets the highest standards of the cruise industry using modern and efficiency-enhancing technologies such as advanced onboard recycling systems or engines compliant with the latest IMO-MARPOL Annex VI requirements regarding nitrogen oxides emissions standards. In addition, some of MSC Cruises' ships are equipped with exhaust cleaning systems, to reduce sulphur oxides emissions and MSC Cruises is investing in studies and implementation of LNG propulsion on a new class of ship. MSC Cruises efforts have been recognized with the award of the "7 Golden Pearls" for its Fantasia Class ships and the "8 Golden Pearls" for its Meraviglia Class ships for the attention paid from design and building to operations to QHSE (Quality Health Safety Environment).

- **Fuel consumption**

Because monitoring and minimizing fuel consumption helps in reducing CO₂ emissions, MSC Cruises strives to save fuel in cruising by lowering water resistance. To that aim, MSC Cruises uses for example a tributyltin free anti-fouling paint on the hulls of all of its ships to prevent hull fouling and substantially reduce drag. The optimization of cruise itineraries also helps in reducing fuel consumption.

- **Waste management**

MSC Cruises, as a member of CLIA, supports a management of waste in accordance with sound environmental principles and in compliance with all applicable regulatory requirements. Each MSC Cruises ship has an environmental officer who is responsible for all environmental aspects onboard. All recycling and waste management activities are carefully monitored and crewmembers dealing with the handling, collection, sorting and management of garbage, receive a training to operate in accordance with MSC Cruises' procedures.

- **Certifications**

MSC Cruises technical department has also been awarded the ISO 14001 (environment management system) and ISO 50001 (energy management) certification by an independent certification body.

To support these environmental initiatives, Employees should be open-minded about innovation and change and managers are encouraged to listen to Employees' ideas about how to reduce resource consumption.

3. HUMAN RIGHTS AND LABOUR STANDARDS

NON-DISCRIMINATION

The diversity of Employees is one of MSC Cruises' greatest assets. We think that their different profiles and backgrounds offer great opportunities and added value to MSC Cruises. To facilitate communication in this diverse environment the official working language is English.

To make sure that each person's individuality is respected, MSC Cruises does not tolerate any discrimination based on sex, race, religion, language, gender, national origin, age, disability, political or ideological beliefs, marital status, and sexual orientation or family responsibilities.

MSC Cruises strictly complies with applicable laws in all aspects of employment, in particular those laws related to elimination of discrimination in respect of employment. Therefore, MSC Cruises is firmly committed to support equal employment opportunity and diversity by ensuring that all decisions to recruit and promote are based on merit.

PROTECTION OF CHILDREN AND ADOLESCENTS

MSC Cruises strongly opposes the use of child labour and complies with all applicable laws related thereto.

MSC Cruises believes in the potential of young people and focuses its efforts on children and adolescents by supporting programs in different parts of the world.

MSC Cruises is proud to be a longstanding partner of UNICEF. Committed to increase awareness of UNICEF's work worldwide, MSC Cruises is involved in the following initiatives:

- **Get on Board for Children**

MSC Cruises has been partnering with UNICEF through the "Get on Board for Children" initiative, collecting donations from guests, selling UNICEF products on board MSC Cruises' ships and conducting advocacy campaigns and integrated initiatives that raise the UNICEF awareness of children and families on board.

- **MSC for UNICEF Day**

Onboard MSC Cruises' ships, MSC Cruises invites children to engage directly with UNICEF through a dedicated onboard children's programme, "MSC for UNICEF Day", a stimulating weekly activity which brings children the opportunity to learn more about UNICEF and its work. Every year 200,000 children on board take part in MSC FOR UNICEF Day activities.

- **Fighting child malnutrition in Malawi**

Since 2014 MSC Cruises has been supporting UNICEF in a dedicated project to treat malnutrition in 25 emergency-affected districts of Malawi, aiming to save 100,000 vulnerable children suffering from severe acute malnutrition by December 2018.

Since 2017, MSC Cruises is also proudly supporting the Andrea Bocelli Foundation in its mission to empowering people and communities, in particular through life-changing work in Haiti. In this context, a Mobile Clinic Project has been created to offer free health care assistance in areas with no or difficult-to-access medical facilities. Organized in the five schools where the ABF focuses its work, the project mainly provides medical care, vaccines, screening and health education.

On board, MSC Cruises is committed to safeguard children and adolescents who join our youth centres on MSC Cruises ships and participate in supervised activities and entertainment.



As a CLIA member, MSC Cruises has adopted practices promoting a safe environment for children and adolescents, including requirements in relation to staff recruitment and vetting to ensure unsuitable people are prevented from working with children.

WORKING CONDITIONS

MSC Cruises supports and respects internationally recognised human rights in conducting its business relationship and activities worldwide. MSC Cruises believes that each person deserves to be treated equally and properly and this responsibility lies also with every Employee. MSC Cruises condemns forced labor and any form of exploitation or slavery and complies with all applicable laws thereto. MSC Cruises provides motivating welfare programs for onboard Crewmembers, such as the "Employee of the Month" award.

HARASSMENT AND OTHER ABUSIVE CONDUCT

MSC Cruises believes in and supports the fundamental dignity of all Employees and does not tolerate any form of harassment or abusive conduct. Harassment and abusive conduct can include acts or threats of violence to another person (including gestures, language and physical contact), the intentional damaging of MSC Cruises' property or the property of another person, or any other behaviour that causes others to feel unsafe in MSC Cruises' workplace.

MSC Cruises does not tolerate retaliation against any Employee who complains of harassment or who participates in an investigation.

FREEDOM OF ASSOCIATION

MSC Cruises recognises the freedom of association of all Employees. All Employees shall have the right to join or not to join and form trade unions and to bargain collectively on their behalf in compliance with applicable laws and regulations.

HEALTH AND SAFETY

MSC Cruises' priority is to provide a safe and healthy onboard environment to its guests and a safe and healthy workplace to its Employees whether working onshore or onboard.

To meet this goal, MSC Cruises complies with all applicable health and safety regulations, including with the strict requirements of the Safety of Life at Sea (SOLAS) Convention and, in some cases, goes even beyond, by implementing CLIA's policies in relation to operational safety, fire protection, shipboard security and health. Below are few examples of the measures taken by MSC Cruises:

- **Safe cruising for our guests**

To ensure our guests can enjoy at all time of their cruising experience a secure onboard environment, MSC Cruises has developed safety procedures requiring the participation of our guests (adults and children). For example, upon embarkation in the main ports and prior departure from the ports, all guests are requested to participate in a one-hour safety drill which involves all Crewmembers and simulates the evacuation procedure. In secondary ports, a detailed safety briefing is also held for all newly embarked guests. MSC Cruises has voluntarily adopted the Cruise Industry Passenger Bill of Rights which provide to each guest, among others, the right to a ship crew that is properly trained in emergency and evacuation procedures.

MSC Cruises' guests are therefore taken care by qualified and trained crewmembers that undertake extensive and refresher trainings (emergency instructions, fire-fighting, life-saving), certification and regular drills for emergency situations, including the evacuation of a ship. In line with CLIA's policy, additional adult lifejackets on board each MSC Cruises ship are carried in excess of the legal requirements imposed by the SOLAS Convention.

- **MSC Cruises' fleet equipment**

MSC Cruises' ultra-modern ships carry backup mechanical, navigational and safety provisions, and feature an innovative "Route Monitoring System" which uses satellite technology to relay the data provided on board to the Maritime Support Centre based in London. The position, speed, heading and course of all MSC Cruises ships is constantly monitored and analysed, together with the depth, current and other parameters of the surrounding waters, plus the position of any other ship within a 40-mile radius. As a result, MSC Cruises ensures that its fleet follows a safe course at all times. Each ship of MSC Cruises' fleet has its own fire patrol, one being dedicated to the engine room, and a safety officer.

- **Safe workplace for Employees**

To ensure Employees' safety is preserved at all times while performing their work, Employees, on shore and on board must comply with the MSC Cruises' safety measures. For example, in accordance with the Standards of Training, Certification & Watchkeeping (STCW) 1995, all MSC Cruises' Crewmembers undertake the Basic Safety Training (BST), which includes basic firefighting. While safety procedures are designed to ensure a secure working environment, it is also important to reinforce that each Employee is ultimately responsible for his own health and safety. Therefore, each Employee shall remove himself from dangerous situations or operations when there is an imminent and serious danger.

- **Health on board**

As part of its commitment to guests and crew safety in the context of communicable diseases, MSC Cruises, following CLIA's recommendation, has adopted a general pre-embarkation health policy: all embarking people have to fill in a pre-boarding public health questionnaire, to assist in preventing the spread of communicable diseases.

- **Certifications**

MSC Cruises' technical department is OHSAS 18001 (safety management) certified and has received the "Safety Best Practices Award" for the high level of enhanced safety procedures implemented on its Lirica, Poesia and Fantasia class ships. The same standard is adopted on the remaining ships which are undergoing the certification process. The quality and safety of all aspects of MSC Cruises' catering practices, both on shore and on board, was officially recognized with ISO 22000 certification (food safety management). In February 2018, MSC Cruises' technical department reached a new security and safety milestone by meeting the requirements to be a Maritime Administration Training Provider for the U.S. Cruise Vessel Security & Safety Act, 2010 (CVSSA). We are the seventh body worldwide to receive this important certification, enabling us to provide training directly to our Security and Ship Command teams on board of our ships calling at U.S ports, enhancing both our procedures across the board and security training for the fleet.

4. ANTI-BRIBERY

MSC Cruises is committed to undertake business fairly and to uphold all applicable anti-bribery laws in its business dealings worldwide.

MSC Cruises strictly prohibits all Corruption, Passive and Active Bribery, and Facilitation Payments. Under different legislation, such conduct can lead to imprisonment for individuals and heavy fines for individuals and entities. MSC Cruises reserves the right to take disciplinary action towards any Employee engaged in such conduct. Employees must not engage a third-party agent, consultant or supplier if there is reason to believe that the agent, consultant or supplier may attempt to breach the MSC Cruises Anti-Bribery Policy.

Should Employees be asked to participate in Facilitation Payments they must actively refuse the payment. The fact that the payment was first proposed by the other party does not alter the conduct. MSC Cruises has a zero-tolerance policy regarding Facilitation Payments, except when the health and safety of an Employee is at stake.

While Gifts offered or received might be permitted under certain circumstances, it is very easy to cross the line from modest value Gifts and Corporate Hospitality to Corruption, Active or Passive Bribery. Modest value Gifts, which are allowed under MSC Cruises Anti-Bribery Policy, include any MSC Cruises promotional Gift. MSC Cruises will not tolerate the payment of bribes to Government Officials, including those disguised as Gifts.

The MSC Cruises Anti-Bribery Policy developed in accordance with the anti-corruption principles recommended by CLIA is delivered to all employees when they take up service at MSC Cruises. Its latest version is available on MSC Connect.

5. CONFLICT OF INTEREST

A Conflict of Interest may arise where an Employee has private interests that may, or be perceived to, interfere with the interests of MSC Cruises in such a way that it creates a risk that the Employee's decisions could be based on, or affected by, such private interest or could otherwise alter the proper performance of his or her responsibilities for MSC Cruises.

Private interests include the Employee's personal and direct interests as well as those of family members or close relatives.

Employees shall not become involved in any activity or have personal interest which may conflict with or alter their professional duties or their judgment, unless otherwise duly cleared and authorized by MSC Cruises.

Whenever circumstances give rise to such a Conflict of Interest, or even the appearance thereof, the Employee should obtain specific written authorization in accordance with the MSC Cruises Conflict of Interest Policy before participating in business where his impartiality is likely to be questioned.

The MSC Cruises Conflict of Interest Policy, which is available on MSC Connect, provides guidelines on how to identify, report and manage actual and potential Conflict of Interest situations. All Employees shall comply with the terms of this Policy, which contains reporting duties for all Employees.

6. SANCTIONS REGULATIONS

Sanctions regulations are prohibitions against engaging in specified international transactions involving certain individuals, entities, countries to achieve a national security and/or political objective.

MSC Cruises complies with Swiss and European Union sanctions regulations as well as with any other sanctions regulations applicable to its activities and business dealings worldwide.

7. ANTI-MONEY LAUNDERING

Money laundering occurs when a person carries out an act that is aimed at obscuring the identification of the origin, the tracing or the forfeiture of assets which he knows or must assume originate from a crime.

Employees are strictly forbidden from participating in or facilitating a money laundering transaction.

Employees shall only conduct legitimate business activities and shall not accept or handle cash or other assets that they have reason to suspect are the proceeds of a crime.



8. FAIR COMPETITION

MSC Cruises is committed to complying with the applicable competition regulations (also known as “Antitrust Laws”) at any time, regardless of the location.

Violations of Antitrust Laws are strictly penalised by law, including in many countries by criminal sanctions.

A key area of illegal conduct is agreements with other businesses whose purpose is to restrain competition (“collusion”). These include collusion with a competitor concerning:

- Agreements regarding any element of the price, for example rates, discounts, surcharges, terms of payment, known as “price fixing”;
- Agreements not to compete on specific markets or not to approach competitors’ customers, known as “market sharing”.

Exchanging commercially sensitive information with competitors, for example prices, costs, product launches or business plans, market share data is illegal and strictly prohibited.

Illegal behavior may also arise through vertical restraints, i.e. restrictive agreements made between firms at different levels of the production/distribution/supply chain, such as:

- Agreement imposing territorial or customer sales restriction to cruises operators in certain circumstances,
- Agreement imposing resale price maintenance, which consists in imposing a minimum pricing in vertical agreement, for instance with onboard retailers.

Due care should be exercised in those agreements MSC Cruises negotiates with cruises operators and on board retailers to ensure no provision might restrict competition in the market MSC Cruises operates that would breach the Antitrust Laws.

A breach of Antitrust Laws may also arise from the abuse of a dominant position. A dominant position is legal and it exists where a company has such a strong market presence that it can behave independently of competitors and customers. Abuse of a dominant position is illegal, and arises from the use of this position to exploit customers or exclude competitors. Due care should be exercised in those markets where MSC Cruises holds high market shares.

9. BUSINESS AND FINANCIAL RECORDS

The accuracy and maintenance of MSC Cruises’ business and financial records is crucial and must be ensured.

In this regard, Employees must:

- Always record and classify transactions in the proper accounting period and in the appropriate account and department;
- Not distort the true nature of any transaction, neither falsify any document;
- Not enable another person’s efforts to evade taxes, launder money, or violate other laws;
- Always support estimates and accruals with appropriate documentation;
- Maintain records according to applicable laws

10. CONFIDENTIALITY AND DATA PROTECTION

CONFIDENTIALITY

All Employees must safeguard all of MSC Cruises’ Confidential Information as well as any Confidential Information received from MSC Cruises’ guests, suppliers and any other third parties. Failure to do so could result in a breach of obligations arising under contracts or laws protecting business secrets, data protection, and privacy.

Confidential Information must not in any case be disclosed to anyone outside of MSC Cruises, including to family and friends, except if legally required.

Confidential Information must not be shared with others inside MSC Cruises except on a “need to know” basis. All Employees are obliged to protect Confidential Information, even after employment or business ends.

DATA PROTECTION

MSC Cruises respects and protects the privacy of its Employees, guests, and business partners, processing the personal information in accordance with the requirements established by applicable data protection laws.

Personal information is processed fairly and lawfully and for specified and legitimate purposes. MSC Cruises stores the personal information securely and takes precautions to prevent unauthorized disclosure. Any unlawful processing of personal information could be damaging for both the natural person from whom the information is collected and MSC Cruises.

All Employees must be adequately trained and be particularly cautious when handling personal information. They should be aware that part of the personal information MSC Cruises processes would be qualified as sensitive under applicable data protection laws and be part of the privacy sphere of other Employees, guests and business partners.