

Fleet Harassment Policy

Policy Name: Fleet Harassment Policy
Version: 1.0
Publication Date: March 2019
Review Date: March 2021
Owner: Employee Relations Manager



1. Purpose

We are committed to creating a positive and supportive working environment for our Seafarers, and we want everyone to be treated with dignity and respect. We trust that everyone respects each other, and any form of harassment, discrimination or retaliation will not be tolerated.

2. Scope

This policy applies to:

- All seafarers while serving on board (including Guest Entertainers and Concessionaire staff with seafarer status).
- Any person employed by a Carnival group company who visits or travels on board a ship for business purposes
- Any persons contracted to a Carnival group company whose job entails visiting or travelling on board a ship
- Any other person contracted with a third party for the purposes of working on board any ship.

This policy is non-contractual and the Company reserves the right to review/amend it at any time.

Details in this policy regarding harassment and retaliation are simply guidelines and are not exhaustive definitions. You are encouraged to discuss with your Supervisor, Manager, HR Manager or a Head of Department should you have any questions about harassment or retaliation.

3. Definitions

Harassment definition:

The Company considers harassment to be any action directed by one person to another regardless of the motives, which the recipient of the action might find to be harassment, including:

- Unwelcome verbal or physical conduct such as touching, pinching, brushing up against another's body, or impeding or blocking movements;
- Unwanted derogatory words or gestures;
- Showing or circulating written, printed or electronically distributed material of a nature which others may find offensive;
- Any other conduct which may interfere with an individual's work performance or create an intimidating, hostile or offensive working environment;
- Any attempt to penalize or punish a person for rejecting or objecting to the actions described above;
- Use of the Internet or e-mail system to transmit, communicate, or receive sexually suggestive, pornographic, or sexually explicit pictures, messages, or material.

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You are advised that harassment does not only have to take the form of physical contact but can include:

- Visual conduct, including leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons or posters;
- Verbal conduct, such as sexually-oriented verbal kidding, teasing or jokes, repeated offensive sexual flirtations, advances or propositions, derogatory comments, commenting on someone's qualities or attributes, jokes, verbal abuse of a sexual nature, verbal comments about a physical appearance, your sexual activity, suggestive or obscene letters, notes or invitations;

Sexual Harassment definition:

Sexual harassment can be defined in two ways:

- When you are offered some tangible favour or benefit, or your working conditions are threatened, based on your response to demands for these favours. I.e. 'You'll get a promotion if you...'
- When unwelcome sexual conduct is sufficiently severe, persistent, or pervasive that it affects your performance negatively and/or creates an intimidating, hostile or otherwise offensive environment

Discriminatory Harassment definition:

The Company's policy prohibits discriminatory harassment based on gender, colour, race, age, national origin, ancestry, marital status, religion, sexual orientation or other protected status.

Examples of conduct that may be regarded as discriminatory harassment are:

- Phrases expressing a quality or attribute of someone, negative stereotyping, disparaging remarks or intimidating acts based on any of the protected categories listed above;
- Telling or forwarding jokes directed to someone's protected status, such as racial or ethnic jokes, regardless of whether "everyone tells them back and forth";
- Posting, forwarding, showing or displaying in any manner cartoons that make fun of any group, religious belief, sex, or individual because of his or her protected status;
- Forwarding offensive e-mails, printing them out or displaying them in any manner.

The recipient's perception, not the harasser's intent, is the standard by which conduct is measured.

4. Policy Details

You are advised that any unwelcome physical contact, sexual advances or similar objectionable actions with a fellow crew member will be considered a violation of this policy and may be grounds for discharge.

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If you experience harassment, you should make it clear to the offending party that their behaviour or actions are offensive. If their behaviour or actions continue, or if you are uncomfortable expressing your feelings directly, you should bring it to the attention of your Supervisor, Manager, HR Manager, or a Head of Department.

5. Employee Assistance Programme

We have an Employee Assistance Programme in place which can be accessed by anyone as a supportive measure.

6. Victimisation or Retaliation

No-one should be subjected to victimization or retaliation for reporting, or expressing opposition to, any incident of harassment. Any such victimization or retaliation is a dismissible offense.

If you make a complaint of harassment, report harassment which you have observed, or provide information relating to such complaints or reports, you will be protected by the Company against any victimization or retaliation. It is your right to bring the complaint or concern to the attention of the Company. No action will be taken against you for filing your complaint, so long as you are truthful and accurate.

7. Relations with Passengers

Any intimate relations or attempts at intimate relations that are unwelcome, including asking a passenger to be alone, kissing, engaging in sexual relations, or any other similar behaviour will be dealt with under the Code of Conduct with a potential sanction being up to and including dismissal.

Interaction and conduct that is not consensual may be considered as a criminal offence and could potentially lead to your arrest.

Passengers should not be invited to an officer/crew accommodation or area, and similarly you should not visit a passenger cabin, unless required to do so in connection with your official duties. You should not under any circumstances, invite a passenger into your accommodation unless that specific passenger is already recognized to be in a relationship with you prior to boarding the vessel. You must declare this to your Head of Department prior to the passenger boarding.

Sometimes complaints from passengers about any form of harassment arise, however it might not be actual intent to harass and the complaints may arise from misunderstandings caused by different cultural practices and standards. It is on this basis that intimate contact with passengers, beyond

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that which forms respectful and polite greeting or formal acknowledgement of an individual is not tolerated by the Company. This policy is written to prevent you finding yourself in uncomfortable situations or involved in a serious harassment claim.

Strict adherence to the above rules are for your protection, and also ensures you don't bring the Company into disrepute.

8. Reporting Harassment

The Onboard Complaints Procedure allows you the ability to raise a complaint verbally or in writing. An informal complaint is usually made verbally to your Supervisor, the HR Manager, or Head of Department.

A formal complaint is done so in writing and submitted to the crew office. If you are not onboard at the time, you can email your complaint to the Employee Relations team shore side at Carnival House.

Alternatively, a call can be made to the Compliance Hotline.

You are expected and encouraged to inform others in the workplace whenever their conduct is unwelcome, offensive, in poor taste, or inappropriate. If you believe you have been subjected to, or witnessed any conduct prohibited by this policy, you should report the conduct to your supervisor, HR Manager, Head of Department, or ashore in the manner stated above. All reports of harassment will be investigated fully and promptly and, as far as reasonably possible, on a confidential basis.

If it is determined that the alleged harasser has violated policies, appropriate corrective action will be taken in accordance with the Company's Disciplinary procedure, which may include discharge.

9. False Harassment Allegations

No-one will suffer any adverse employment consequences as a result of a good faith report under this policy. The Company vigorously defends your right to work in an environment free of harassment and retaliation. The Company also recognizes that false accusations can have serious consequences. Accordingly, if you are found, through the investigation process, to have falsely accused another person of harassment or retaliation, you may be subject to appropriate disciplinary action, up to and including discharge.

10. Queries

If you have any queries regarding this Policy please contact the Shore Employee Relations team - hrservices.employeerelations@carnivalukgroup.com

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