



## **MSC CRUISES SLAVERY STATEMENT AND HUMAN TRAFFICKING STATEMENT**

This statement by MSC Cruise Management (UK) Limited, on behalf of itself and its parent company MSC Cruises S.A. (together and hereinafter “MSC Cruises” or the “Group”) is made pursuant to Section 54 of the Modern Slavery Act 2015 and provides an overview of the actions that MSC Cruises has taken to date and will take in the future to manage the risk of modern slavery within its operations as well as its supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

MSC Cruises has a zero-tolerance approach to any form of modern slavery. MSC Cruises is committed to conducting its business with integrity and transparency in all its business dealings and to ensuring that effective systems and controls are in place to safeguard against any form of modern slavery.

## **MSC CRUISES ORGANISATIONAL STRUCTURE**

MSC Cruises is the world’s third-largest cruise brand as well as the leader in Europe, South America, the Gulf region, and Southern Africa, with more market share in addition to deployed capacity than any other player. MSC Cruises is also the fastest-growing global cruise brand with a strong presence in the Caribbean, North America, and the Far East markets.

As of June 2024, the fleet consists of 23 modern cruise vessels with additional vessels to be delivered in the coming months and years. MSC Cruises employs over 30,000 staff globally and sells cruise holidays around the world.

Headquartered in Geneva, Switzerland, MSC Cruises is part of the MSC Group, the leading privately held Swiss-based shipping and logistics conglomerate with over 300 years of maritime heritage.

## **OUR VALUES CODE OF BUSINESS CONDUCT**

MSC Cruises company values coupled with its Code of Business Conduct details the rules and protocols by which we should treat fellow employees. This includes:

- Transparent and fair behaviour, such as protecting human rights
- Compliance with legislation, including fundamental rights at work freedom of association and the elimination of discrimination throughout employment.

Employees are offered dedicated e-learning training to emphasise the importance of acting with integrity and in line with our own Code of Business Conduct.

MSC Cruises Code of Business Conduct ensures that all of its businesses comply with international human rights standards and that employees are treated in a fair and transparent manner. This includes adherence to any national laws pertaining to working conditions and minimum wages.

MSC Cruises human resources policies permit the termination of employees found to be involved in any breach of the law banning forced labour, slavery and human trafficking.

## **CREW**

With regard to its crew, MSC Cruises complies with the requirements of Maritime Labour Convention 2006 (“MLC”) from the International Labour Organization (“ILO”) which sets minimum international standards for working and living conditions for seafarers.

MSC Cruises operates robust recruitment standards, to safeguard against human trafficking or individuals being forced to work against their will. In addition, our policies provide freedom for workers to terminate employment, freedom of movement and freedom of association. Thus, all employees working for MSC Cruises have the right to join, not join, or form trade unions to bargain collectively on their behalf, in compliance with applicable laws and regulations.

## **KEY HIGHLIGHTS OF MSC CRUISES COMPLIANCE PROGRAM**

MSC Cruises has a comprehensive ethics and compliance programme in place. All MSC Cruises’ employees must adhere to the Code of Business Conduct and comply with its supporting policies. In 2024, the priority will be to ensure all employees have successfully passed the online training modules.

The focal points outlined in the training modules are:

- 1. Human rights and labour:** MSC Cruises believes that each person brings something unique to its business. MSC Cruises supports and respects the protection of internationally proclaimed human rights, ensuring that the company is not complicit in human rights abuses by conducting due diligence, assessing risks and addressing suspected cases of potential Human Rights violations.
- 2. Non-discrimination:** The diversity of employees is one of MSC Cruises’ greatest assets. Therefore, MSC Cruises is firmly committed to supporting equal employment opportunities and does not tolerate any form of discrimination.
- 3. Recruitment and Freedom of Association:** The company operates a robust recruitment policy, including determining eligibility to work in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will. In addition, policies provide freedom for workers to terminate employment, freedom of movement and freedom of association. Thus, all employees working for MSC Cruises have the right to join, not join, or form trade unions to bargain collectively on their behalf, in compliance with applicable laws and regulations.

**4. Freedom from harassment:** MSC Cruises does not tolerate any form of harassment or abusive conduct or any form of retaliation against any employee who complains about harassment.

**5. Whistleblowing/Reporting:** MSC Cruises has a whistleblowing hotline for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week. Reports can be made anonymously. It is managed by a third-party supplier and all data supplied is maintained on secure servers in Germany. All reported content is handled exclusively by MSC.

**6. Sanctions compliance:** MSC Cruises continues to adhere to its Global Sanctions Policy to ensure compliance with all applicable trade sanctions laws and regulations in regions where MSC Cruises operates. All potential suppliers of goods and services must sign a declaration to confirm that they are not restricted from conducting business under sanction laws. MSC Cruises also developed training to support employees in relevant business areas, including procurement, human resources, and sales.

**7. Business Partners' Code of Business Conduct:** We have developed a code of conduct specifically designed for third parties, which was approved by our Executive Director in 2022 and rolled out in February 2023. It further strengthened our suppliers and other partners to adhere to our values, including but not limited to the protection of human rights.

## **TRAINING AND DEVELOPMENT**

During 2023, nearly 15,000 new crew members embarked on the MSC Cruises fleet. In 2024, we are expecting around 6,500 new crew members. Priority will be given to ensuring the vast majority are trained in all aspects of compliance through our e-learning modules and face-to-face training.

## **FRAUDULENT EMPLOYMENT OFFERS**

MSC Cruises is aware of cases of fraudulent shipboard employment offers being made to potential candidates for shipboard positions by unauthorised and unconnected third parties. These offers are normally made via web adverts and/or direct emails by third parties maliciously impersonating our cruise brands representatives for the sole purpose of taking advantage of vulnerable workers in a country with a high unemployment rate. We are conscious that such malicious practice could be a vehicle for human trafficking or a scam against said workers who are promised to process their travel documents against the payment of an upfront fee. We constantly and closely monitor this situation soliciting our agencies to report any issue associated with this issue, highlighting the risk on our webpage, and monitoring social media via specialised providers.

## **MSC CRUISES SUPPLIERS' PROCUREMENT PROGRAM**

MSC Cruises chooses suppliers who share high ethical standards and concern for the welfare of workers, the environment, and local communities. The MSC Cruises' Business Partner (Suppliers) Code of Business Conduct outlines the expectations MSC Cruises has of its suppliers, and it reflects the commitment to undertake business in a fair, ethical, and responsible manner. In addition, procurement initiatives ensure the incorporation of specific clauses on ethical business conduct and sustainability in every contract and agreement when suppliers are formally

registered via our online portal. MSC Cruises has a specific clause in its contracts when working with external workers in its workplaces, providing special protection to them, which is regularly checked and forced. Key contractual clauses include:

- Environmental Protection
- Health & Safety at work
- Social responsibility
- Modern Slavery
- Compliance with anti-corruption and sanction laws.

MSC Cruises has a zero-tolerance approach towards the violations of the laws banning forced labour, slavery, and human trafficking. MSC Cruises contractual agreements permit the termination of suppliers for a single violation.

### **CONTINUING DEVELOPMENT**

MSC Cruises will continue to update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or business.

This statement is effective for the financial year ended 31 December 2023. The statement is approved by the Board effective 30 June 2024 and is signed on its behalf by Mr Pierfrancesco Vago, Director of MSC Cruise Management (UK) Limited and Executive Chairman of MSC Cruises SA.