

It is the policy of Royal Caribbean Cruises Ltd. to reimburse employees of Suppliers for reasonable expenses incurred in order to conduct RCL Company business, upon submission of a properly prepared and approved expense invoice.

1. Policy Detail

1.1 Scope

This policy applies to all Suppliers and their employees who travel on the RCL's behalf.

1.2 Purpose

The purpose of this policy is to establish rules and guidelines regarding reimbursement to Suppliers ensuring that (i) expenses are reasonable and incurred during the course of RCL Company business with care and discretion; and (ii) reimbursements to Suppliers are on a fair and consistent basis.

2. Rules and Guidelines

2.1. Travel Arrangements

All travel arrangements, including air transportation, lodging and ground transportation must be made through the Travel Services department at RCL; otherwise expenditures will not normally be reimbursed without prior written approval from a documented project approver. Suppliers must book through the approved booking channels which include: (i) Travel Services department at RCL; (iv) approved automated online booking tools; (v) and approved after-hours emergency agency services provider.

Travel Services at RCL will make no special accommodations concerning air carrier, type of lodging or classification of automobile, unless prior written approval is received from a documented project approver and included with the expense invoice.

2.2 Travel Authorization

Travel is a manageable expense and comes under the scrutiny of the project budget constraints as well as this policy. Each traveler is accountable to be aware of project guidelines and approval requirements and to follow them.

A travel authorization will be sent to the traveler's designated approver when a travel request is made or reservation is booked. Travel is considered approved, unless the traveler's approver denies the travel authorization. Any unauthorized travel is a violation of this policy, may be grounds for breach of contract, and will not be reimbursed.

2.3 Reimbursement

RCL does not pay expenses for spouses/ partners on business trips, any exception to this policy must be approved in writing by one of the documented project approvers and included with the final expense invoice.

All expenses denominated in foreign currency must be converted to the currency of designated by the Supplier's JDE record with RCL.

2.4 Exchange Rate

The exchange rate to be used for a personal credit card or cash transactions is the actual exchange rate paid, substantiated with an exchange receipt, an ATM receipt with corresponding exchange rate from the Wall Street Journal or any other similar tool such as [QANDA](#) Corporation. Reimbursement for items paid by credit card will be at the local currency rate indicated on the credit card statement.

2.5 Expense Invoices

All Supplier expenses must be reported within sixty (60) days of when the expenses were incurred.

Expense invoices submitted to RCL for payment must include the following information or they will be returned and not processed:

- a) Supplier Name
- b) Employee Name and Title,
- c) Project Name / Ship Name
- d) Dates of expense (Traveled to and from and individual dates)
- e) Copies of all receipts

Unusual circumstances or expenses should be accompanied with written authorization from one of the documented project approvers when possible. If circumstances prohibit prior approval or written authorization expense should be accompanied by a written explanation to facilitate the approval process.

Expense Invoices must be submitted to RCL for payment within 45 days of the resources final day onboard or final day assigned to the project. In the event of extenuating circumstances an extension to this time line may be granted. This extension shall not exceed a total of 60 days and must be authorized in writing by one of the documented project approvers and included with the final expense invoice(s).

Supplier employees are not permitted, under any circumstances, to submit expenses for any RCL Employee or other vendor unless the expense has been previously authorized in writing by one of the documented project approvers.

Approval

Any exceptions must be approved in accordance with this policy by one of the documented project approvers and included with the final expenses invoice(s).

2.6 Paid Invoices or Receipts

Receipts are to be included with the invoice. Original receipts must be maintained by the Supplier in accordance with the terms of the contract/ agreement. Receipts are required for all expenses over 25 USD. Receipts that have several different types of charges, such as hotel bills, must be broken down into each individual type of charge (e.g. room, tax, internet, meals, parking, and laundry). Employees traveling in the EUROPEAN and ASIA regions, where a transaction includes VAT/GST, must obtain and submit a proper VAT/GST original receipt for all non-gratuity expenses. (NOTE: Credit Card receipts are not sufficient for VAT expenses).

All non-VAT/GST credit card receipts must bear the name of the employee requesting the reimbursement. The date on the receipt must be the same as the date the expense was reported on the expense report / invoice(s).

Receipts must include the following details:

- Date and place (merchant identification/name) expenditure was incurred.
- The company, name and title of all people who participated in the business discussion.
- The nature of the business discussion and/or the business reason for the expense or the nature of the business benefit to be derived as a result of the expense.
- For procurement expenses a description and quantity of each item purchased and total cost of the order

3. Expense Types

3.1 Entertainment

Entertainment expenses are not reimbursed by RCL. This includes but is not limited to: in-room movies, mini bar amenities, gift shop, in-flight movies, in-flight headsets, alcoholic beverages during travel (e.g., on airplanes, in airports/ train stations).

3.2 Meals

Business Meals

Meal allowances are intended to provide flexibility and simplicity while managing costs. This policy provides a “not-to-exceed” daily rate that allows for adjustment when meals are provided through other means. For example, when a lunch is provided at a meeting, the Employee must reduce his or her maximum allowance for that day to \$40 (\$60 less the \$20 allocated for lunch). This provides the flexibility for employees that decide to skip a meal and eat a hearty later meal while mitigating the risk for abuse.

Refer to Appendix A for Maximum Daily Meal Allowance.

Gratuity is considered part of the meal allowance and must be considered by the employee

Meals While Working Onboard

Employees working onboard ships are expected to eat onboard. Meals eaten in ports will not be reimbursed unless eating off ship was required for a specific business purpose. This purpose should be noted on the receipt submitted for reimbursement.

3.3 Air Transportation

Employees are expected to balance the shortest flight time and the lowest cost, while weighing the convenience of the Employee and the business being conducted. With low airfares as a priority, travelers and Travel Services agents will look for the most direct service at the times and dates requested avoiding stop-overs and overnight stays. When overnight travel on trains or ferries is more economical and time efficient than flying, Employees are allowed to obtain first class or private accommodations. If there is a change of plans, the travel services provider must be notified in order to properly cancel the ticket so any residual value can be reclaimed.

Employees are required to book their travel at least 14 days in advance to take advantage of savings. Exceptions require the prior written approval by one of the documented project approvers.

Airline Preference

Choice of airlines and scheduling is at the discretion of Travel Services. Employee requests for their preferred carrier will be honored when appropriate; however, the final decision is that of Travel Services and must consider optimization of the Company's carrier arrangements and the lowest cost to the Company.

Class of Service Eligibility

All supplier travel is booked in coach/ economy class, unless otherwise approved in each instance by one of the documented project approvers.

Frequent Flyer Programs

RCL does not pay for airline club membership or entrance fees.

Optional Product Charges

Employees may expense standard base baggage fees (excluding overweight, oversize, or additional pieces) and stand-by fees for same day travel, in lieu of purchasing a new ticket. Other optional fees including Internet access and seat assignments require written approval by one of the documented project approvers. Charges for in-flight entertainment and beverages are not eligible for reimbursement.

Reserving the Lowest Fare

The lowest priced airfare that meets the business need for the traveler will be booked and ticketed by Travel Services or a Company designated provider service. Lower fares must be considered when departure or arrival times are within a reasonable window. Travel Services will consider domestic flights departing or arriving within 4 hours, and international flights departing or arriving the same day.

Employees are expected to book the lowest available fare. However, if scheduling circumstances require that Employees select alternatives to the lowest fare, the below process must be followed:

- a. Employees may book a fare that exceeds the lowest available fare by 200 USD. In order to purchase a ticket that exceeds the 200 USD limit must be approved in writing by a documented project approver noting the reasons for the approval. Ticket purchases that exceed to 200 USD allowance and will be paid by the Supplier.

Emergency travel requested at the last minute will be proactively reported to the approver, but ticketing will not be withheld.

Exceptions

The following approval level is required for air transportation exceptions:

- a. Senior Vice-President or Vice-President, that reports directly to a Named Executive Officer (NEO)

An SVP or VP, that is a Direct Report to a Named Executive Officer (NEO), must approve in writing the following:

- Suppliers travel above listed class of service (see section 3.3 Class of Service Eligibility).

3.4 Lodging

All lodging must be reserved through Travel Services or Pre-Approved by one of the documented project approvers in order to receive reimbursement. Employees must be aware of and utilize negotiated rate properties as denoted in the online ebooking tool in cities where available.

Appropriate room types are considered a “corporate standard” single room. Generally, 3 star properties are sought out for most Employees and 4 star properties for Officers. Because these ratings are nebulous and not always a good indication of quality, Travel Services will deviate from these guidelines when appropriate to ensure the best combination of price and quality. The paid lodging invoice or folio must be attached to the expense report for reimbursement.

Travel Services will work with Employees to provide the most appropriate hotel, based on hotel rating, distance from the business site, and total travel costs. In some cases, this will mean not booking the lowest hotel rate. This will require a spirit of cooperation between the traveler and the Travel Services provider.

Shipboard

All employees below VP are entitled to double occupancy in a crew cabin if one exists, and if not, to double occupancy in an inside guest stateroom.

Hotel Charges

In room movies, mini bar amenities, gift shops, spa and other services will not be reimbursed.

Extended Stays

For Employees who are temporarily required to work in a single location away from their home base for a period of 8 to 30 consecutive days, extended stay accommodations must be coordinated in advance with Travel Services. Assignments lasting more than one month will be considered long term and corporate housing must be utilized. Corporate housing must also be coordinated through the Travel Services department.

When staying in accommodations that provide adequate kitchen facilities, Employees will be reimbursed up to USD 90, in the US, GBP 170 in the UK, EUR 150 in Europe and CNY 850 in China, per week, for groceries, laundry, gasoline and miscellaneous charges in lieu of the Maximum Meal Allowance.

Hotel Exceptions and Approvals

All hotels booked outside of Travel Services require pre-approval from one of the documented project approvers in order to receive reimbursement the written approval must be included with the expense invoice(s).

3.5 Ground Transportation

Transportation Out of Town

The choice of transportation while on a project must be made based on the lowest cost alternative. The use of airport shuttles, super shuttle, light rail and other public transportation is encouraged, keeping the Employees knowledge of the area and safety in mind at all times.

Automobile Rental

All automobile rental reservations must be made through Travel Services. If there is a change of plans, the travel services provider must be notified.

It is the responsibility of the traveler to inspect the vehicle prior to renting. Pre-paid gas, car rental upgrades and navigation unit rentals will not be reimbursed.

As the Company has pre-negotiated arrangements with preferred Suppliers, all car rentals will use these preferred Suppliers. Booking classes are as follows:

Number of Passengers	Largest Allowed U.S. Car Type
Up to 3 Passengers	Intermediate
4 Passengers	Full Size
More than 5 Passengers	Van

Auto Rental Insurance

Suppliers, their employees and outside contractors are not covered under the RCL insurance and must consult with their company leadership regarding the purchase of additional car rental insurance.

Taxis

A receipt must support all taxi fares claimed on the invoice. Taxi receipts must indicate destination and date of travel.

Airport Parking

Parking expenses should be minimized. Long-term airport parking must be used whenever the vehicle will be left for more than 24 hours. Employees are to use discounted off-airport extended parking whenever possible.

On extended trips, the costs of parking versus the use of a taxi or shuttle service must be compared. The lower cost option should be selected.

3.6 Miscellaneous

Tips

Tips, as listed below for North American travel, must be appropriate and reasonable. For non-North American travel refer to the customs of the country using similar table for comparison. Always identify the nature of the tip (e.g. maid, bellhop, driver, etc.) For more guidance, please refer the table below.

The Company will reimburse Employees onboard the Company's ships for the gratuities recommended when accompanied by a description of each individual tipped and the amount (e.g. cabin steward, 7 days at \$3.50 = \$24.50). If extra tipping is necessary, an explanation must be provided.

Porter, Bellman, Skycap	\$1.00 per bag
Doorman	\$1.00
Maid, Housekeeper	\$1.00 per day
Meals / Room Service	15 - 18% or country norm

Miscellaneous Expenses related to lost luggage, such as necessary toiletries, must be approved in writing by one of the documented project approvers and provided with the final expenses invoice(s).

Telephone

Business related calls should always be direct dialed and charged using a ship admin line or RCL employee cell phone whenever possible. Business related calls made via personal or Supplier provided cell phone or calling card will be reimbursed via an expense report. Direct dial cellular calls placed outside the local calling area utilizing a personal or

Supplier provided cell phone will be reimbursed at the rate charged by the cell phone service providers. Roaming charges associated with business calls will be reimbursed as billed.

Personal roaming/international calls are only authorized during business travel and should not exceed two calls daily. Overall personal usage is allowed but should stay within reasonable limits. Users must reimburse RCL for personal calls placed on ship admin lines or RCL phones if they surpass reasonable limits.

Laundry

Reasonable laundry expenses will be reimbursed for out of town travel in excess of five days. Emergency laundry or dry cleaning (including pressing) will be reimbursed if explained appropriately.

Memberships Dues and Subscriptions

Dues and subscriptions are not reimbursed by RCL.

Personal Items

The following personal items used in business will not be reimbursed by the Company:

- Luggage, toiletries and non-business related reading materials, etc.
- Damage to an Employee's personal car is covered by the Employee's own insurance.
- Traffic or parking tickets.
- Items lost or stolen while traveling on Company business.
- Clothing and costumes to wear to business functions.
 - a. Tuxedo/ women's formal wear rentals are an exception and must be accompanied with a receipt and description of the event requiring rental.

Internet

Internet fees in hotels and onboard RCL ships associated with business related usage may be expensed via an expense report. Onboard RCL ships all attempts should be made to use RCL laptops attached to the RCL corporate network. If RCL access is not available employees should work with the designated project manager or project approver to secure shipboard wireless access onboard credit/refund.

Personal usage is only authorized during business travel and should not exceed thirty (30) minutes daily. Overall personal usage is allowed but should stay within reasonable limits. Users are not to request reimbursement for personal usage billed in a hotel or onboard ship if they surpass reasonable limits.

4. Entitlements

Casino

All employees while onboard for business purposes, may only play the slot machines during non working hours. Employees in uniform or wearing a name tag may not use the casino facilities.

6. Definitions

For purposes of this policy, the following terms shall have the following meanings:

Company: means Royal Caribbean Cruises Ltd., (RCL) its subsidiaries and affiliates (excluding Pullmantur).

Employees: means an employee or Officer of the Supplier's company.

Supplier: means any person or business that furnishes materials, products or services to the Company, or any agent, broker or other intermediary that facilitates the furnishing of such products, materials or services, including a travel agent, concessionaire, port agent, tour operator, contractor, consultant, international representative, hiring partner, advertising agency or real estate broker.

Traveler: Any Owner, officer, employee and/or representative of a supplier traveling on RCL related business/ projects.

Traveler's Designated Approver: is an RCL employee who is documented as a project approver, for the specific project travel is being booked towards.

Travel Services: means the Company's travel department or an alternative provider of the services that is approved by Travel Services and senior leadership for all Employees in a geographic region.

Owner: _____ Date: _____
Chair, T&E Committee

Reviewed by: _____ Date: _____
SVP, General Counsel and Chief Compliance Officer

Reviewed by: _____ Date: _____
VP, Audit and Advisory Services

Approved by: _____ Date: _____
Chairman and CEO

Appendix A

Maximum Daily Meal Allowance

All Other Cities:			
Maximum Daily Allowance: \$60			
Meal Guidance: \$10, 20, 30			
Gratuities are considered part of the meal allowance and must be considered by the employee.			
Maximum Daily Allowance: \$75		Maximum Daily Allowance: \$115	
Meal Guidance: \$10, 25, 40		Meal Guidance: \$25, 35, 55	
Country	City/ State	Country	City
Argentina	Buenos Aires	Aruba	Aruba
Aruba	Oranjestad	Australia	Sydney
Australia	Adelaide	Austria	Wien
Australia	Darwin	Bahamas	Nassau
Australia	Fremantle	Brazil	Sao Paulo
Australia	Hobart	Canada	Calgary
Australia	Wagga Wagga	Canada	Quebec
Austria	Graz	Canada	Toronto
Austria	Neusiedl	China	Hong Kong
Austria	Salzburg	Finland	Helsinki
Austria	Vienna	Finland	Turku
Austria	Wels	France	Nice
Bahamas	Freeport	France	Paris
Barbados	Bridgetown	Germany	Berlin
Belgium	Brussel	Germany	Bremen
Brazil	Rio de Janeiro	Germany	Frankfurt/Main
Brazil	Santos	Germany	Papenburg
Canada	Halifax	Greece	Athens
Canada	Vancouver	India	New Delhi
Cayman Islands	Grand Cayman	Ireland	Dublin
China	Shanghai	Israel	Tel Aviv
Croatia	Split	Italy	Florence
Croatia	Zagreb	Italy	Genoa
Denmark	Copenhagen	Italy	Milan
Denmark	Gudbjerg	Italy	Rome
Finland	Naantali	Italy	Turin
Finland	Vantaa	Italy	Venice
France	Cannes	Netherlands	Amsterdam
France	La Baule	Netherlands	Den Haag
France	Marseille	Norway	Oslo
Germany	Bremerhaven	Norway	Trondheim

Germany	Hamburg		Russia	Moscow
Greece	Mykonos		Russia	St Petersburg
India	Bombay		Spain	Barcelona
India	Mumbai		Spain	Madrid
Indonesia	Balikpapan		Sweden	Stockholm
Italy	Mestre		Switzerland	Basel
Italy	Naples		Switzerland	Zurich
Italy	Napoli		United Kingdom	Belfast
Italy	Pisa		United Kingdom	Bristol
Italy	Trieste		United Kingdom	Crawley
Italy	Venezia		United Kingdom	Edinburgh
Jamaica	Montego Bay		United Kingdom	Egham
Mexico	Cancun		United Kingdom	Horley
Netherlands	Groningen		United Kingdom	Kensington
Netherlands	Hoofddorp		United Kingdom	London
Netherlands	Rotterdam		United Kingdom	Manchester
Netherlands	Schiphol		United Kingdom	Weybridge
New Zealand	Auckland		United Kingdom	Woking
New Zealand	Christchurch		United States	Key West
Norway	Gardermoen			
Norway	Lysaker			
Norway	Sandvika			
Philipsburg	St Maarten			
Portugal	Lisbon			
Romania	Bucuresti			
Singapore	Singapore			
South Africa	Durban			
Spain	Benalmadena			
Spain	Benicarlo			
Spain	Mallorca			
Spain	Palma Mallorca			
Spain	Segovia			
Spain	Tenerife			
St Kitts	Basseterre			
Sweden	Malmö			
United Arab Emirates	Dubai			
United Kingdom	Chertsey			
United Kingdom	Cobham			
United Kingdom	Guildford			
United Kingdom	Salisbury			
United Kingdom	Shepperton			
United Kingdom	Southall			

United Kingdom	West Drayton		
United States	Alyeska, AK		
United States	Talkeetna, AK		
United States	Mesa, AZ		
United States	Scottsdale, AZ		
United States	Carlsbad, CA		
United States	Irvine, CA		
United States	Los Angeles, CA		
United States	Milpitas, CA		
United States	Napa, CA		
United States	Newport Beach, CA		
United States	Palm Springs, CA		
United States	San Diego, CA		
United States	San Francisco, CA		
United States	San Pedro, CA		
United States	Santa Clara, CA		
United States	Santa Monica, CA		
United States	Santa Rosa, CA		
United States	Aspen, CO		
United States	Vail, CO		
United States	Bridgeport, CT		
United States	Danbury, CT		
United States	Aventura, FL		
United States	Coconut Grove, FL		
United States	Palm Beach, FL		
United States	Hilo, HI		
United States	Lahaina, HI		
United States	Chicago, IL		
United States	Annapolis, MD		
United States	Linthicum, MD		
United States	Waldorf, MD		
United States	Boston, MA		
United States	Medford, MA		
United States	Minneapolis/St Paul Apt, MN		
United States	Billings, MT		
United States	Henderson, NV		
United States	Las Vegas, NV		
United States	East Brunswick, NJ		
United States	Newark, NJ		
United States	New York		
United States	Lake Oswego, OR		
United States	Philadelphia, PA		

United States	West Chester, PA			
United States	Beaumont, TX			
United States	Odessa, TX			
United States	Stowe, VT			
United States	Arlington, VA			
United States	Sterling, VA			
United States	Seattle, WA			
United States	Spokane, WA			
United States	Washington DC			