

## **2.1 SHIPBOARD COMPLIANCE WITH REGULATIONS**

### **2.1.1 Compliance with Regulation**

The United Nations has established two specialized agencies to deal with international maritime issues: the International Maritime Organization (IMO), based in London, and the International Labor Organization (ILO), which based in Geneva. Both organizations have adopted conventions dealing with the safety, health and welfare of seafarers. The most widely adopted convention that governs shipboard labor and crew employment practices is the Marine Labor Convention (MLC) 2006, which has been adopted by 33 seafaring nations and is fully enforce since August 20, 2013.

- Under normal circumstance, the applicable law will be that of the Flag State of the ship on which the employee is serving, but the law of the employee's country of residence or, in certain situations, the law of the Port State in which a ship is berthed may also be relevant. Port State Control, such as the Coast Guard in the United States has the authority to enforce crew safety regulations. Port State Control has the authority to ensure that the provisions of MLC 2006 are adhered to on all ships calling the ports that fall under their jurisdiction.

### **2.1.2 General Conditions of Employment**

As a guiding principle, member cruise lines conduct their worldwide operations according to the highest standard of business integrity and fair treatment of employees. All personnel, shipboard and shore side, have the basic right to be respected and treated in a fair and just manner at all times by superiors and fellow employees. As a global industry, cruise lines recognize the value that different cultures bring to the industry, encourage workforce diversity and provide a workplace free of discrimination based on gender, race, religion, age, disability, nationality, sexual orientation, social or ethnic origin. All crew members employed aboard a vessel must be 18 years of age or older.

### **2.1.3 Hours of Work**

Hours of work and hours of rest will comply with flag state regulations, applicable collective bargaining agreements, MLC 2006 and/or STCW conventions.

### **2.1.4 Living Conditions**

All crew members receive room and board at no cost and are entitled to live in a clean, well-maintained, and healthy environment. The crew areas on each ship are inspected on a regular basis by the ship's master or representative designated by him.

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### **2.1.5 Health and Safety**

The shipboard work environment will be monitored and governed through safety and quality management systems (SMS). Cruise line sponsored medical care is provided for all crew members working on board. Crew members that become injured or ill while working are entitled to receive sick leave in accordance with the applicable Collective Bargaining Agreement.

The work environment operates in accordance with Safety of Life at Sea (SOLAS), the International Safety Management (ISM) Code, the Standards for Training Certification, and Watchkeeping (STCW), and respective flag state requirements.

### **2.1.6 Seafarer Identification**

ILO Conventions 108 and 185 require that ratifying countries issue identification documents to seafarers.

### **2.1.7 U.S. Transit Visas (C1/D1)**

The U.S. State Department oversees the issuance of visas to foreign nationals who sail with ships into U.S. ports. U.S. embassy personnel in the crew member's country of origin conduct background checks. A cruise ship's work force is pre-screened, and checks are conducted on prospective employees.

### **2.1.8 Recruitment**

Responsibility for the recruitment and placement of seafarers who serve on cruise vessels may be undertaken by third parties, such as seafarers recruitment and placement services (SRPS). When personnel administration or the recruitment of seafarers is delegated to a third party, it is important to ensure that the activities of such agencies are monitored for compliance with MLC 2006 convention standards.

### **2.1.9 Repatriation**

The precise circumstances in which the employer will be responsible for repatriation costs are included in the employment contract, employment manual or terms and conditions issued to the seafarer.

### **2.1.10 Wages**

Crew members receive wages that are competitive and comparable to international pay scales with compensation packages that are equal to or exceed similar positions. For certain positions, there is the opportunity to earn gratuities. In addition, the company has policies in place that include recruiting at the trainee level and providing education in order

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for the crew members to obtain work skills that facilitate promotion and career development.

### **2.1.11 Security**

The cruise industry places the highest priority on the safety and security of its passengers and crew. From the Master to the utility staff and all guests, every soul onboard a cruise ship must be listed on an official manifest. Passengers and crew may embark or disembark only after passing through security. Security personnel are employed onboard every vessel. Federal and state authorities have the right to investigate crimes onboard cruise ships. The FBI has the authority to investigate and prosecute alleged crimes in international waters involving American Citizens. The U.S. Coast Guard has jurisdiction for inspection and enforcement of international safety and security standards for all ships calling at U.S. ports.

### **2.1.12 Complaint Resolutions / Grievance Procedure**

All ships recognize the right of employees to voice complaints. All ships will maintain an environment in which crew members may express complaints and obtain resolution of those grievances without fear of retaliation or retribution. Refer to Section 11.2 of this manual for a more detailed outline of the company's Grievance Procedure.

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