

1. Policy Detail

1.1 Scope

This policy governs the making of corporate Political Contributions by Royal Caribbean Cruises Ltd. and its majority owned subsidiaries (the “Company”).

This policy does not affect personal contributions made by Company Employees in their individual capacity.

1.2 Purpose

The Company may choose to use funds to advance matters of public policy that are consistent with the sustainability of the Company’s business and core values. The purpose of this policy is to ensure that all Political Contributions made by the Company or on behalf of the Company are consistent with the laws and regulations that govern such practices in the United States and internationally, the Company’s Code of Business Conduct and Ethics and the Company’s values.

2. Pre-Approval Requirements

2.1 Executive Committee Approval

Any Political Contribution made by the Company must be beneficial to the long-term interests of the Company and must be approved by the Executive Committee of Royal Caribbean Cruises Ltd. In determining whether or not to approve a request to make a Political Contribution, the Executive Committee of Royal Caribbean Cruises Ltd. may consider whatever factors it believes relevant, which could include such things as the merits of the candidate, election or ballot initiative, consistency with the interests and values of the Company, a candidate’s views on issues of importance to the Company, the quality and effectiveness of the organization to which the contribution will be made, etc.

2.2 Legal Approval

In addition to the approval required by Section 2.1, any Political Contribution made by the Company must be approved in advance by the General Counsel of Royal Caribbean Cruises Ltd. or his or her designee (“General Counsel”). In determining whether to approve a request to make a Political Contribution, the General Counsel shall consider compliance with all applicable laws and regulations in the jurisdictions in which the contributions are made as well as adherence to this policy and the Company’s Code of Business Conduct and Ethics. In determining whether to approve a Political Contribution, the General Counsel may request such information as he or she deems appropriate.

2.3 Other Approvals

Certain Company subsidiaries may have requirements in place related to the approval of Political Contributions to be made by such entity. The approvals required by this Section 2 are in addition to any such entity-specific requirements.

2.4 Political Contributions Within the United States

Notwithstanding any other provisions of this Section 2, no individual who is a Foreign National may participate in any decision regarding Political Contributions to be made by a US subsidiary of the Company to any US federal, state or local election.

3. Reporting

The making of Political Contributions is subject to significant regulation and public disclosure requirements, and the Company will comply with all applicable laws and reporting requirements related to corporate Political Contributions. In addition, the Company will post this policy on its website.

4. Definitions

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

Foreign National: means any individual who is not either (i) a citizen of the United States or (ii) lawfully permitted for permanent residence in the United States. For purposes of clarification, an individual with dual citizenship in the United States and another country does not qualify as a "Foreign National" for purposes of this policy.

Employees: means an employee or officer of the Company, whether shoreside or shipboard.

Governmental Unit: means any federal, international, state, county, or municipal governmental body and any other unit of state or local government and any department, agency or commission thereof.

Political Contribution: means any contribution of money or property by the Company (a) to any candidate for election to political office; (b) to any political party or committee; (c) to promote or support any ballot initiative; or (d) to any political action committee or other entity or association organized for the purpose of nominating, electing or appointing a person to a political office in any Governmental Unit.

5. Policy Administration & Governance

This policy will be managed by the following roles, responsibilities and span of control:

Chairman and Chief Executive Officer

The Chairman and Chief Executive Officer of Royal Caribbean Cruises Ltd. is responsible for the approval of this policy and any amendments or exceptions to this policy.

Chief Financial Officer

The Chief Financial Officer of Royal Caribbean Cruises Ltd. is responsible for the approval of this policy and any amendments to this policy.

General Counsel

The General Counsel is responsible for overseeing this policy and proposing any amendments to this policy to the Chairman and Chief Executive Officer and Chief Financial Officer of Royal Caribbean Cruises Ltd.

This policy must be reviewed by all of the parties below and approved by the Chairman and Chief Executive Officer and Chief Financial Officer of Royal Caribbean Cruises Ltd. no less than once every 2 years.