



Speak Up

A toolkit for managers and leaders











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Introduction

This toolkit it has been created to inspire, equip and support us all to do our jobs as managers and leaders at Carnival UK.

Our Culture Essentials are important in making Carnival UK a great place to work and a place where we are continually improving. Team members notice what we do and say so it is important that we lead by example.

We want to help our colleagues to understand the importance of speaking up and to feel empowered to do so; understanding how to Speak Up and what happens when they do.

We know that speaking up takes courage, so we want it to be clear that we'll always listen, learn and act when someone does.

Everyone needs to:

- Feel empowered, safe, and able to challenge or question when something doesn't feel right
- Make suggestions when things could be done better
- Be able to speak up without fear of it reflecting badly on them or of there being any retaliation

Our purpose is to create unforgettable holiday happiness - something we can only do if we all feel able to Speak Up when something is not right.

This toolkit comprises five main sections:

- 1. Role
- 2. Recognition
- 3. Response
- 4. Report
- 5. Review

We want this toolkit to support you in navigating when someone speaks up and any concerns that are raised. Whilst it will not address every scenario, it serves as a guide to the right course of action.

As leaders we are role models and need to make good decisions so we lead by example. This toolkit is designed to support us to do the right thing and to demonstrate this to colleagues through what we say and do.

We welcome your feedback to help us to continue to develop this toolkit. Please contact learning@carnivalukgroup.com with any comments or suggestions.







Section 1 - Role

Being a leader is about demonstrating and embedding the positive behaviours described in our Culture Essentials. Most importantly, as leaders we need to show that we believe in them by what we do not just by what we say.





See something, do something



Respect & Protect

Respect & Protect our people, the planet, the law, and our Company



Improve

Focus on compliance and our performance as a team



Communicate

Talk openly about our values and priorities and act as we expect others to



Listen & Learn

Listen to each other, be accountable for our actions and learn from our mistakes



Empower

Give our teams what they need to succeed

We're all expected to demonstrate these behaviours. However, there is a higher expectation on us as leaders to behave ethically and role model ethical behaviours to our teams.









SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS ROLE SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS ROLE

For **Speak Up** specifically, this means:

For all colleagues

Skilled behaviours

- Take action if something doesn't seem right
- Be confident in challenging and raising any concerns
- Speak the truth

Unskilled behaviours

- Ignore or avoid things that aren't working as they should be
- Try to cover up if things go wrong
- Fail to raise concerns

Additionally, for managers and leaders

Skilled behaviours

- Encourage your team to speak
 up, and lead by example
- Challenge and raise concerns at all levels and know the correct reporting channels
- Be confident to express your views honestly and openly
- Consider the impact of your approach and behaviour on others

Unskilled behaviours

- Avoid speaking up through fear of conflict or retaliation
- Retaliate if you are challenged
- Hold back ideas or views which might be helpful to others

When individuals Speak Up about concerns, challenges or suggestions they may have, there are many benefits. We should all feel safe and able to Speak Up.

However, we recognise that colleagues may have some questions or worries about speaking up. Our role as leaders is critical in helping and supporting them, even when they may feel uncomfortable.

A 'leader' is a person who sees a better way and then gathers people together to move towards that better way.

Leadership is about good change and bringing others along on a journey, rather than just telling them to do something. It is also about being ethical, about showing commitment through what we do, how we do it, and how we treat each other, our quests and suppliers.

We want our leaders' to be ethical leaders, empowered to make the right decisions. We each have a responsibility to take accountability for our actions and to ensure that they align with the expectations of our Code of Business Conduct and Ethics and other policies and procedures that exist to guide us in our roles. We're also responsible as leaders for ensuring that our teams understand their own responsibilities.

Remember that we all have the support of Carnival UK and a growing community of ethical leaders around us.

Why is ethical leadership important?

Ethical leadership has the following benefits:

- It delivers a better working environment for everyone
- It protects the company from mistakes
- It improves the quality of our work and helps our business to be sustainable
- It enables us to make a difference for now and the future

The basic 'skilled behaviour' for everyone in 'Speaking Up' is to act, to do something rather than doing nothing. The 'unskilled behaviour' is to ignore or avoid things that aren't working the way they should.

So, if concerns are brought to us, or we see something that needs attention, we must act. This is an important part of our role as ethical leaders who lead by example.

What this means is that we need to:

- Be aware of what is happening around us
- Recognise that this is our job, rather than assuming it is someone else's
- Stay connected to those we work with
- Notice when someone is not themselves or changes their behaviour
- Use all of our senses to gauge if something is not right
- Have courage to take any action that is needed
- Be an example of ethical leadership for others

SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

ROLE

SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

ROLE

What is the difference between company ethics and personal ethics?

Everyone has their own **personal ethics** - or set of values. These are what we believe is important and they guide our lives. They will have been influenced and shaped by many factors, including our family upbringing, education, communities, religious ideas, life experiences, and our personality.

Company ethics are what the company believes are the right things to do at work. These are shaped by legal obligations, guest experience and ideas about how people should behave in the work environment.

As leaders, we are expected to behave ethically in how we do our job. In other words, when we are at work the company ethics come first, even if these are different to our own ethics. We are responsible for ensuring that our team members understand this difference and appreciate the need to uphold company ethics.

An example of differing personal and company ethics

Your line manager has asked you to hold meetings with your team to discuss how best to prepare a work schedule for the coming months. She has asked you to invite views from everyone in the team and to see if the schedule can be agreed by consensus. She believes that involving the team in this way will mean they will be more accepting of a new schedule.

You have a strongly held view that as the manager of your team you should make decisions about schedules and that the team should accept what you decide. In your culture, a person's place in the hierarchy is fully respected and nobody would challenge this. The ethical thing to do in your community would be to ask the senior person to make the decision. It would then be accepted by everyone. You therefore feel uncomfortable about involving your team in decisions on a new schedule.

What is the ethical thing to do as a leader in Carnival UK?

As ethical leaders we DO what we SAY. When we are at work, it is the company ethics that are of most importance, and this is what we demonstrate in our role.

'Empower' is one of our Culture Essentials. Skilled behaviours include:

- Understanding the needs of others
- Invites input from the team
- Encourages diversity of thought
- Shares ownership and visibility

So, in this case we would put aside our own personal view of how the decision on schedules should be made and embrace empowering the team to make the right decisions.

This means we would discuss the schedule with our team, ask what others think and try to reach consensus on a new schedule, rather than making the decision on our own. This shows we are an ethical leader.

We all face situations at times that are not straightforward or where we are unsure about a course of action or are concerned about something we've seen.

Remember that speaking up in good faith (with an honestly held belief), even if it later proves to be wrong, is what we want everyone to do. It is something that is welcome, it is part of company ethics, and as leaders we are expected to encourage and model it.

Our colleagues have various routes available to them to Speak Up if they have concerns or want to make suggestions for how we could be doing things better.

It's important to remember not to take it personally if they choose to use another route (including the Compliance Hotline) rather than come to us. What's important is that they have the courage to Speak Up and that they are supported in doing so.

However, as leaders, individuals will often approach us first to report a concern or raise a suggestion.

The remainder of this Toolkit will demonstrate what to do when a colleague speaks up to you. Here is a simple way to remember the basics of what must be done:

SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

ROLE

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If a team member speaks up to us, it raises a FLAG, and it's our role to:

Give our Full attention to the person speaking up

Make sure to Listen actively to what they say

Think about what Action may be needed

Guard the safety of the person speaking up

The following pages outline what FLAG means in practice.

Full attention

If someone speaks up to raise a concern or suggestion, find a quiet, private place to meet. Then make sure there are no interruptions such as people coming into the room, phones ringing, or other distractions such as nearby noise. Put your mobile phone on silent and place it out of the way.

To give full attention, we have to quieten the voice in our own head which judges what people are saying. Try to listen without making judgments, to simply hear what is being said. While this is difficult to do, it's important that we don't let our own assumptions or beliefs influence what we're hearing.

To help us show our team members that they have our full attention and that we are interested in what they're going to tell us, try to keep eye contact.

Try to listen without interrupting. Allow the team member to say what they have to say, even if it means hearing a lot of information quickly which you may not fully understand or be able to remember. You can go back and ask them to repeat things or make things clearer once they have finished speaking. It's about making them welcome and being open to what they say without making judgments.

Always make sure to thank the team member at the end of the meeting, as this may not have been easy for them to do.

Acknowledging how they might be feeling can also be helpful.

Listen actively

Try to **listen to understand** rather than to find things with which to agree or disagree.

Taking brief notes will help later in remembering what was said.

The key to good listening is to be able to repeat back (summarise) what has been said, in a succinct way. This shows active listening and, if anything has been misunderstood, the person will be able to correct it.

Summarising what someone says is not something we do naturally in conversations. You may need to remind yourself to do this. And it can be helpful to practice summarising in other conversations, so it becomes more natural.

Here is an example of summarising in practice:

Leader: "Please tell me what you saw today that made you concerned."

Team member: "Well, one of my colleagues was lifting some heavy equipment and he bent down to lift it without bending his legs properly. I know from the safety training video that this is not the right way to lift things. I went over to tell him he could damage his back, but, as I was talking to him, a manager came over and told me to mind my own business, and that safety was his responsibility, not mine. He then told my colleague to get on with it and keep lifting the way he had always done."

Leader: "So, you were trying to tell a colleague about the correct lifting procedure so that he wouldn't damage his back as the load was heavy, but a manager came over and told you not to interfere and instructed the colleague to continue lifting in the wrong manner. Is that right?"

Team member: "Yes, that's right. But it wasn't just that. The manager was very rude, and it didn't sound like he was following our Culture Essentials - I know some of them are about respect and protect, and it didn't seem that the manager was respecting me or protecting my colleague. It shouldn't be one rule for us and a different rule for managers."

Leader: "I see. So, you're also concerned about the manner in which the manager spoke to you and felt he wasn't practising our Culture Essentials, which are things that we all should do, including managers."

Team member: "That's it. So, you can see why I thought it best to tell you about this."

Leader: "Yes and thank you for bringing it to my attention. Perhaps I could ask you a few more questions so that I'm clear about what happened...."

In this example, the leader is showing their understanding by recapping the situation the team member had described. They're not making any judgements or challenging the team member. They are simply showing that they're interested in finding out what the concern is.

SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

ROLE

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Another way to listen actively is to ask relevant questions. This again shows that you are following what is being said and that you're interested and engaged. It can also elicit more information than what has already been said.

Try to keep questions as neutral and simple as possible. Keep an even tone of voice, be mindful of your body language (be relaxed) and ask questions in as non-judgmental way as possible.

For example, rather than asking: "What, EXACTLY, do you mean when you allege that Mary incorrectly reported the hours of work of a section in which YOU don't even work??"

You could instead ask:

"Could you explain why you believe the hours of work were incorrectly reported?"

If a team member is nervous about speaking up, how we ask questions will either make them tell us a lot more or will result in them closing down and saying nothing. Our manner in asking the question is of importance here, not simply the words we use.

There are two different types of questions we can use when listening – closed questions and open questions.

Closed questions can result in a short - one or two word - answer, such as 'yes', 'no', 'maybe', 'Tuesday', 'not sure' and so on. Examples are:

"Were you in the kitchen on that day?"
"Do you work in Accounts?"
"Do you think that was a good decision?"

Although closed questions can be useful to establish specific facts, they are not very helpful for getting someone to talk openly.

Open questions are questions for which there is more than one possible answer, and which seek more information from the speaker. They usually cannot be answered with a single word or two. Examples are:

"What happened in the kitchen on that day?"
"What has been your experience of working in Accounts?"

"What impact did that decision have on your team?"

Always start with open questions and ask more open questions than closed questions when listening to a concern brought by a team member. This allows them to feel safe, give you more information and to explain in their own way, so that you can understand the concern more clearly.

Action needed

After meeting with the team member and listening carefully to the concern or suggestion raised, we need to think about what was said. Your notes should assist you to reflect – keep a note of key factual information such as dates, times, and who was there.

Ask yourself:

- How serious is the matter raised?
- Does it appear to be against any company policies?
- Does it appear to be illegal?
- Have you noticed anything similar previously or have others reported similar concerns?
- What is the impact?
- Is it against company ethics?
- Do you need any other information to decide what to do?
- Is this something you can deal with, or should you escalate it?

Do not put off taking action that may be needed, even if that is simply reporting or escalating the matter. Think about the level of confidentiality required and the topic matter - are there any immediate concerns or dangers?

It may be useful to consider any patterns or repetition that you see occurring. Is the same concern being brought up regularly? This may indicate a deeper problem and require more analysis – you can always ask for help or support from others to do this. The same problem may be happening in different areas, so discussing it with other leaders may help to highlight a hidden fault or breakdown.

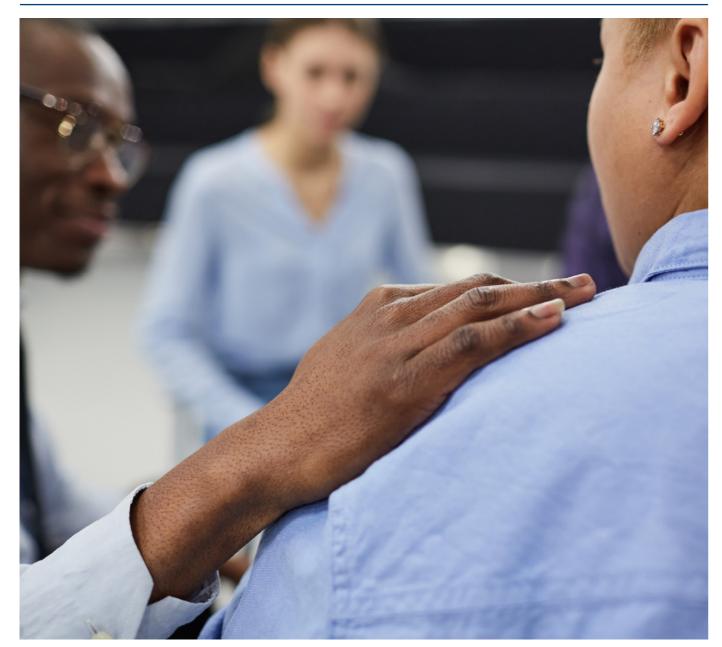
There are **resources** that can help us to think about what action might be needed. Please refer to Additional resources and Support section.

You may also be able to deal with the concern or suggestion by discussing it with your team or with other leaders, without having to escalate the matter. Please be sure to consider confidentiality when discussing concerns and only share with those who have a need to know or who have a genuine role in supporting you to deal with the concern. If in doubt, please contact your Head of Department or Senior Management Team member for guidance.

SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

ROLE
SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

RECOGNITION



Guard safety

Once a team member has told you about a concern, it is likely that others will know. It's important that you make sure there is no retaliation, unfair treatment or negative impacts on the team member. You should also make sure that you don't put pressure on the team member yourself.

Think about the sensitivity of the conversation. Does the person raising the concern need someone with them to provide support?

If you have any concerns about the person's mental or physical welfare, seek help immediately from the appropriate resources such as the medical team onboard, Occupational Health ashore or a Mental Health First Aider.

Section 2 - Recognition

As ethical leaders, we have a responsibility to listen to concerns and suggestions that are brought to us, and also to keep a look-out ourselves for issues of concerns.

We should always remain alert, even if a concern or suggestion is raised that seems trivial or unimportant. By taking these concerns seriously, individuals will be more comfortable coming and talking to you if they have more serious concerns in the future. It may also mean, once the concern is examined and addressed, that you will have solved a problem and the outcome can be shared with others.

Remember it is not necessary to know that something is proven before a concern is raised. What is important is that the concern is brought in good faith (with an honestly held belief) and is based on what the person knows at the time. It may be that they do not know everything about the situation and there may be a good explanation for what the person has reported.

What concerns might be raised?

Below are some examples, and there are many more examples that you may come across.

1. Damage or loss to the company or its assets

This could be through:

- Fraud
- Cheating
- Stealing
- Forgetting to do something important
- Choosing not to do something important

This could include breaking the law and corrupt actions. The person or people involved could be **employees** but could also be **suppliers**, **contractors**, **guests** or **others** connected to Carnival UK.

Example: A team member tells you that he saw a colleague from another department remove two bottles of vodka from the stores, put them in a holdall bag and walk away. The team member says that the colleague was not on duty at the time and it didn't look like they were delivering the bottles to any of the bars.

2. Accounting and reporting issues

This could include:

- Non-compliance
- Misrepresentation
- False reporting
- Changing records

Example: A team member brings an expenses form to your attention. He says that the expenses claimed are outside of the company policy but that the claim has been signed as correct by a line manager. The amount involved is £120. He says that when he told the line manager, the response was to just pay it.

3. Environment, health and safety issues

There are many possible concerns here, including things which may harm a person who is doing something incorrectly as well as things which may harm others.

Example A: A team member tells you that a guest continuously refuses to take appropriate hygiene or sanitisation precautions, e.g. to wash/sanitise their hands. The team member is concerned because it could be a risk for her colleagues and other guests.

Example B: A team member tells you that he believes the ship has been illegally discharging waste and that this is not the first time. He says that everyone knows about it but it has been kept quiet. He is worried that he will lose his job because he told you.

Example C: A team member tells you his friend has been feeling really low. He's not left his cabin for two days and he thinks he's worried about something going on at home.

4. Human rights issues

Example: A team member tells you that they're concerned about practices they've witnessed when working with one of our business partners. Working conditions in their factory didn't look safe and they were concerned that the workers appeared to be working very long hours.

5. Employment issues such as bullying and retaliation

Example: A team member tells you that her colleague, who is a new member of staff and a younger person, has been subject to jokes by two other colleagues. She says it does not sound offensive and seems to be in good humour, but she is worried that the joking will get worse and that the younger colleague does not know what to do and is afraid to say anything.

6. Other issues such as violations of company policy or not complying with the 'Code of Business Conduct and Ethics'

Example: A team member tells you that they suspect a colleague is taking a copy of guest contact details and giving it to a competitor. She does not have evidence but has suspicions and knows that this is serious and should not be done by her colleague.

7. Something that is repeated and is against best working practice

Example: Overloading of cargo.

Remember that these are just some examples, there are many more possible concerns you could encounter.

Please refer to the Reporting section which provides more detail.









SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS RESPONSE SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS RESPONSE

Section 3 - Response

It is part of our role as an ethical leader to raise issues of concern and to listen to concerns that are brought to us. In the previous sections you have seen examples of what those concerns might be about.

This section outlines how to respond if concerns are brought to you.

Bringing a concern to you will probably not have been easy for the team member. It's likely that they will have thought a lot about it before telling you, and they may be worried or upset that they'll get someone else into trouble. They may be feeling tense or emotional.

How you respond, especially in the first few minutes, is very important. Your response will determine whether the person is open and tells you a lot, or whether they are wary, close down and do not tell you very much more. There may also be others watching to see how you respond and they will learn from • Excluding somebody from the response that you give.

When a team member brings a concern to you, try not to appear annoyed or irritated. Remember, we want everyone to Speak Up and raise any concerns, and to feel comfortable sharing suggestions and ideas.

- Show interest in what they are telling you
- Remain calm
- Stay open and curious don't blame, judge or get defensive

Remember that this is about receiving information. You're not doing a formal investigation. That may be necessary later,

and someone else may do this, but what is important at this point is that the team member feels able to Speak Up freely.

What is retaliation?

Retaliation (also known as: revenge, getting even, payback) is doing something harmful to someone because they've done or said something that you perceive as harmful to

Retaliation can take different forms and some can be hidden from view. Some examples are:

- Giving more or less work to somebody or making work more difficult by changing schedules or procedures
- Changing working hours to make them less favourable
- Demotion
- Reducing pay
- communications, meetings or training (including social gatherings or social media chats)
- Threatening behaviour, intimidation, or bullying
- Ignoring a team member or not speaking to them as normal
- Physical harm, emotional or verbal abuse;
- Spreading false rumours or saying nasty things about the team member
- Writing a poor, unbalanced performance report

As a leader, we have a responsibility to ensure that no harm comes to a team member who has spoken up.

This means that we should be careful of how we treat the individual and be aware and mindful of others' reactions.

You should ask the team member to tell you if there is any retaliation.

Carnival UK has a zero-tolerance policy towards retaliation and the appropriate policy and procedure should be followed if you find that there has been retaliation.

A word of caution - don't promise confidentiality

Don't make promises that you can't keep. A team member may tell you something and ask that it be kept confidential between the two of you. You cannot quarantee this - the matter raised may have to be escalated and investigated, and confidentiality would then be broken.

What can you say if a team member requests confidentiality?

- Each case will be handled carefully, respectfully, and sensitively
- I may be required by company ethics to take some action
- Confidentiality cannot be guaranteed, but only those who have to be involved with the concern will know about it
- It's your duty to raise concerns and to speak up, even if this is difficult to do
- Anyone who raises a concern in good faith will be protected against retaliation, unfair treatment or negative impact by either the company or others

Remember, if a **FLAG** is raised you should give your **F**ULL attention, **L**ISTEN actively, decide on ACTION needed, and GUARD safetv.



SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

REPORT

SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

REVIEW

Section 4 - Report

When you reflect on what action is needed, you may decide you can find a resolution within the team or by speaking informally with another leader. Not every concern will need to be escalated.

However, it is important that you can identify:

- 1. When something is serious
- 2. When you are unable to deal with something effectively on your own
- 3. When something has been reported several times and might indicate a deeper problem that requires wider support

Never delay taking action to escalate a concern where anyone might be in danger.

Refer to the Additional Resources section for details of our Reporting of Improprieties Policy which will help you know which things must be reported. If you decide that the concern is serious and should be reported, there are people who can help you.

Be clear in communicating that a concern has been brought to you and make sure to look back at your notes. Pass on any facts such as dates and times. Distinguish between what may be a belief or feeling and what was witnessed or is known to be fact.

The routes for escalating a concern that has been reported are set out in Appendix A below. If you're ever unclear on the right place to go for support then please contact the Ethics & Compliance Team who can help you get the report to the right place.

Examples of concerns under each of the three headings (people related, HESS related, and non-HESS related), can be found in Appendix A.

Section 5 - Review

The individual that brought a concern to you may be worried if they hear nothing afterwards.

Keeping the person informed of what action has been taken will help them to stay calm. It's a good idea to meet with them, even if you cannot tell them any detailed information. There may be times when you cannot tell them what is happening, such as when someone is disciplined, but this can be explained in an appropriate way.

The person will appreciate that you stayed engaged with them. This builds trust, not only with the person who raised the concern, but also with others who may be aware of what is happening. Every effort you make to be responsive to concerns will build more trust and make it easier for others to speak up in the future.

Taking time to engage is also an investment in embedding our culture and demonstrating the right behaviours. We should talk in our regular meetings with our team members about ethics, the importance of doing the right things and the behaviours expected. The more we speak about these things and invite discussion, the more normal it will seem.

Some ideas for ongoing conversations include:

- Discussing examples of decisions, and what was done to support the right outcome
- Recognising team members when they demonstrate ethical decision making and sharing examples with our teams
- Sharing examples of scenarios in which a decision needs to be taken and working through the scenario in team meetings ask team members what they would do and why

Remember that we may not have the answer to every question, and that's OK. We can seek an answer from someone else and take it back to the meeting.

How should you review?

Approach the review as an opportunity to learn. Some questions to reflect on and discuss with the individual(s) who raised the concern, if appropriate - are:

- What was learned?
- Does something need to be changed as a result?
- How well did I respond to the concern?
- Who else in Carnival UK needs to know?
- What Culture Essentials were demonstrated?
- What needs to improve for a concern to be raised sooner?

We hope you find this toolkit useful and thought-provoking. We encourage you to discuss and use to embed a safe, open and supportive place to work.

SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

APPENDIX

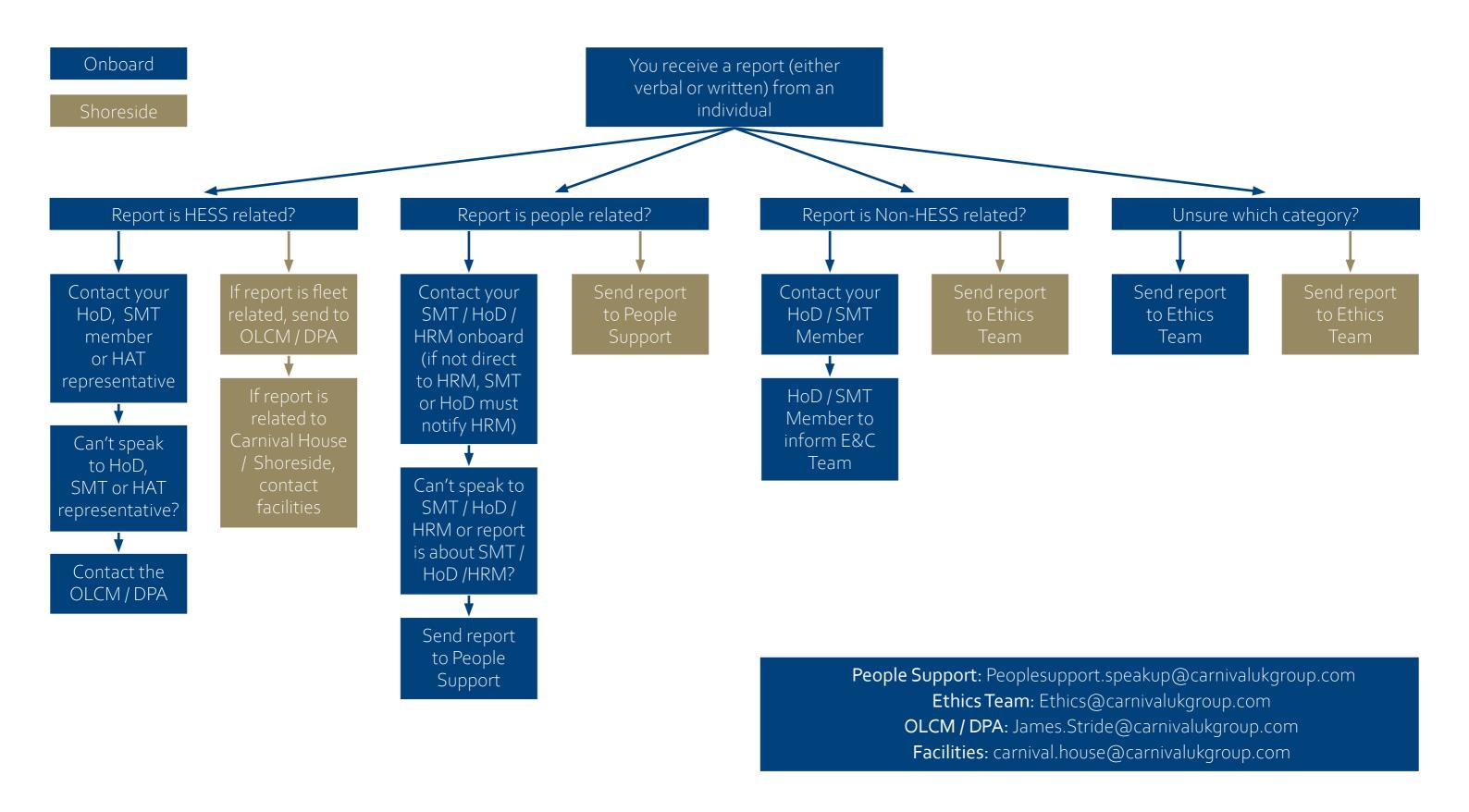
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Appendix A - Potential reporting issues



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Appendix A Potential reporting issues

This appendix lists examples of potential reporting issues under three headings - people related issues, HESS related issues and non-HESS related issues.

HESS Related issues

Health, environmental, safety and security issues ("HESS matters"), including but not limited to:

- Illegal discharges of waste streams by vessels operated by the Company;
- Non-compliance with applicable environmental, health, safety and security policies, laws or regulations
- Fraud or deliberate error in the shipboard or shoreside preparation, evaluation, review, or audit of any vessel operated by the Company
- Fraud or deliberate error in the shipboard or shoreside recording and maintaining of the HESS records of the Company, including improper recording of waste disposals in vessel record books
- Criminal activities which have been committed or likely to be committed, including suspicious activities such as bomb threats, possession of illegal substances or threats to another's health or safety
- Failure to follow health protocols such as those relating to COVID-19, or the excessive or inappropriate use of alcohol, etc.

People Related issues

Employment issues, including but not limited to:

- Retaliation for reporting Reportable Matters or making a report of any illegal activities or policy violations to the Company or other authorities
- Harassment, including sexual harassment
- Illegal discrimination such as that based on sex religion, race, national origin, sexual orientation, disability, or age.

Non HESS related issues

Fraudulent and corrupt activities, including, but not limited to:

- Actual or perceived cases of fraud or theft involving Company assets or personnel
- Corrupt behavior and/or non-compliance with the Company's Anticorruption Policy and Guidelines, including bribery
- Fraud or deliberate misrepresentation in booking reports, guest satisfaction reports, status reports

Accounting and reporting issues, including, but not limited to:

- Fraud or deliberate error in the presentation, evaluation, review, audit, recording or maintaining of any financial statement or financial record of the Company
- Noncompliance with the Company's internal accounting controls
- Misrepresentation or false statement to or by an employee regarding a matter contained in the financial records, financial reports or audit reports of the Company
- Deviation from full and fair reporting of the Company's financial condition and results of operations

Data privacy and information security matters including but not limited to:

- Suspected data breaches
- Suspicious e-mails or communications
- Violations of privacy or data security laws, including GDPR, or privacy or data security policies including disclosure or misuse of guest or employee data

Other unlawful activity or violation of Company policy, that has been committed or is likely to be committed including but not limited to:

- Non-compliance with the Company's Code of Business Conduct and Ethics
- Suspected Modern Slavery activities, including Human Trafficking
- Anti-competitive behavior and/or non-compliance with the Company's Antitrust Policy and Guidelines
- Violations of insider trading laws and/or non-compliance with the Company's Securities Trading Policy
- Concealment of any of the matters that are reportable under this Policy

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SPEAK UP: A TOOLKIT FOR MANAGERS AND LEADERS

REMEMBER

Appendix B - Additional resources & support

Our Vision and Purpose

https://theinsider.carnivalukgroup.com/what-we-stand-for-2/

Our Culture Essentials

https://theinsider.carnivalukgroup.com/what-we-stand-for-2/our-culture-essentials-home-2/

Speak Up video and info for all colleagues

https://theinsider.carnivalukgroup.com/what-we-stand-for-2/our-culture-essentials-home-2/speak-up-home/

Policies & Procedures

https://theinsider.carnivalukgroup.com/policies/

GLADIS

 $\underline{https://cuk-live.marinels.com/Pages/Login/ShowLogin}$

Global HESS

https://cuk-sou-hso1.carnivaluk.com/HESS/ghess.nsf

Employee Assistance Programme and support

https://theinsider.carnivalukgroup.com/sources-of-support/

Mental Health Support & resources

https://theinsider.carnivalukgroup.com/your-mental-health/

Remember:

If someone Speaks Up to us with a concern, it raises a **FLAG**, and it is our role as leaders to:

Give our Full attention to the person raising the concern
Make sure to Listen actively to what they say
Think about what Action may be needed
Guard the safety of the person raising the concern

Ask yourself:

- How serious is the matter raised?
- Does it appear to be against any company policies?
- Does it appear to be illegal?
- Have you noticed anything similar previously or have others reported similar concerns?
- What is the impact?
- Is it against company ethics?
- Do you need any other information to decide what to do?
- Is this something you can deal with, or should you escalate it?