

INTRODUCTION

Royal Caribbean Group (“Company”) requires its Employees to use Social Media responsibly. This Social Media Policy (“Policy”) provides rules and guidance on the use of Social Media.

1. Policy Detail

1.1 Scope

This Policy applies to all Employees and all Social Media activity, including without limitation Social Media “influencer” activity.

1.2 Purpose

Social Media is a widely used form of communication. While Social Media creates new opportunities for communication and collaboration, it also creates new responsibilities for the Company and Employees. This Policy provides general rules and guidance for the use of Social Media and is intended to respect personal expression while protecting the Company’s proprietary information and business interests. This Policy is not intended to restrict communications or actions expressly protected or required by applicable law.

2. Rules and Guidelines

When using Social Media, Employees are expected to follow Company policies and applicable laws and abide by the following rules:

- Exercise good judgment
- Be respectful to fellow employees, guests, suppliers, affiliates, and business partners
- Do not post content that could be viewed as malicious, obscene, threatening, intimidating, discriminatory, harassing, or retaliatory
- Respect the privacy of guests and other employees
- Do not post content about employees, guests, suppliers, affiliates, and business partners without their permission
- Safeguard and protect Confidential Information
- Do not use the Company’s trademarks or marketing materials without written permission from Corporate Communications
- Do not share information about the Company that has not been made publicly available by the Company through the Company’s regulatory filings and/or official Company communications (e.g., RCG press releases or posts).
- Be a good brand ambassador for the Company and do not share posts or comments which may damage or reflect poorly on the reputation of the Company or its employees
- Upon request by the Company, immediately delete any post or content the Company deems to be in violation of Company policy

2.1 Confidential Information and Non-Public Financial or Operational Information

Employees may not disclose Confidential Information, including without limitation, the Company’s non-public information, intellectual property, and information relating to newbuild designs, business plans, business strategies, contract terms, financial results, forecasts, bookings, strategic reports, onboard or other business performance, vendors, guests, operations, facilities, actual or potential legal claims or proceedings, policies, procedures, internal business-related communications, or personal information about other Employees.

2.2 Improper Conduct

Employees may not engage in harassing, discriminatory, retaliatory, or other conduct contrary to Company policies or applicable laws.

2.3 Representations and Communications about the Company

Employees may not misrepresent their position with the Company. For instance, if an Employee is not a Company Vice President, they may not state that they are.

Only authorized Employees may make statements on behalf of the Company. If an Employee believes an official Company response is needed, they should bring it to the attention of a member of Corporate Communications and must not provide a response on their own initiative. If an Employee makes statements on Social Media that may be relevant to the Company's business, industry, products, services, Employees, customers, partners, or competitors, the Employee must include a disclaimer that makes it clear that the Employee is speaking for themselves and not on behalf of the Company.

Employees may not post content related to the following topics without including a disclaimer that makes it clear that the Employee is speaking for themselves and not on behalf of the Company and without first receiving written approval from Corporate Communications (EmployeeCommunications@rccl.com):

- The Company's non-public operations, including, without limitation, behind-the-scenes or "back-of-house" information about the Company's business, offices, ships, or private destinations;
- The Company's policies or procedures; or
- The Company's competitors.

Employees may post content related to Company events, initiatives, and products provided the information (1) has been made publicly available by the Company through the Company's regulatory filings and/or official Company communications (e.g., RCG press releases or posts) and (2) is compliant with Company policies. Employees should avoid posting negative content about the Company except as permitted or required by law.

An Employee shall be responsible for any errors, omissions, loss, or damages claimed or incurred due to the Employee's Social Media activity that has not been specifically authorized and approved by the Company.

Employees must review and comply with the Public Relations Policy, which establishes rules and guidance for Employees' communications with the Media.

2.4 Public Facing Partnerships and Engagements

Employees must receive written approval from Corporate Communications and the Global Compliance and Ethics Group before agreeing to public-facing paid or unpaid partnerships, promotional arrangements, professional engagements, third party brand deals, or sponsored posts.

2.5 Promoting the Company

The Company recognizes that Employees may wish to use Social Media to promote the Company, its brands, and its products. The Company encourages Employees to share, engage with, and promote official content produced and posted by the Company. If an Employee is unsure about whether specific content may violate Company policies, the Employee must contact the Human Resources Department, which may confer with Corporate Communications before responding to the Employee's request. The Company may monitor all such posts for compliance with the Company's policies, guidelines, and best practices.

Employees are expected to ensure that any information they post about the Company is accurate, and that any mistakes are quickly corrected. Employees should remember that almost everything posted online is archived; therefore, even deleted or altered posts may be found. Employees must not post anything that includes rumors, speculation, or misleading or inaccurate information related to the Company, other Employees, guests, suppliers, vendors, or competitors.

To the extent that Employees are authorized as part of their job duties to use social media accounts to advance the Company's interests, the Company owns the social media accounts and related content. If an Employee is tasked with sharing content from the Company's channels, the Employee must follow all applicable Company and brand guidelines.

2.6 Expectation of Privacy

The Company reserves the right to monitor all public blogs and Social Media sites for the purpose of protecting its interests and monitoring compliance with Company policies. Employees are cautioned that they should have no expectation of privacy while using Company equipment or facilities for any purpose, including the use of

Social Media, and there must be no excessive use of Company computer equipment for personal or frivolous purposes. If activity is found to be compromising, insubordinate, adverse to the Company's legitimate business interests, or in violation of Company policy or applicable law, the Company may require deletion of such content.

3. Related Policies and Procedures

When using Social Media, Employees are expected to follow the Company's Code of Business Conduct and Ethics and other policies, including without limitation the following policies:

3.1 Conflict of Interest Policy

The [Conflict of Interest Policy](#) identifies and addresses conflicts of interest involving Employees.

3.2 Equal Employment Opportunity and Anti-Discrimination Policies

The Company is committed to ensuring equal employment and promotion opportunities to all qualified employees and candidates. More information is available in the Employee Handbook and [Code of Business Conduct and Ethics](#).

3.3 Harassment, Guest Interaction, and Crime Policy

The [Harassment, Guest Interaction, and Crime Policy](#) explains the Company's commitment to providing a safe environment for Employees and guests free of harassment, unwelcome sexual advances, and crime.

3.4 Reporting and Non-Retaliation Policy

The [Reporting and Non-Retaliation Policy](#) is designed to ensure Employees speak up and inform the Company about illegal or unethical activities and is intended to reassure Employees that the Company will not allow retaliation against any Employee who, in good faith, reports a concern in accordance with the policy.

3.5 Investment Community Disclosure (SEC Regulation FD) Policy

Requests for information from the Wall Street community (e.g., analysts, portfolio managers, investors, brokers, etc.) should be referred to the Investor Relations Department, as set forth in the [Investment Community Disclosure \(SEC Regulation FD\) Policy](#).

3.6 Confidential Information Policy

The [Confidential Information Policy](#) governs confidential information of the Company and third parties and establishes rules related to the ownership, use, and disclosure of confidential information.

3.7 Securities Trading Policy

The [Securities Trading Policy](#) establishes guidelines to promote compliance with federal, state, and foreign securities laws relating to certain persons who are in possession of material non-public information about a company. Employees must ensure that any information that is not considered material, non-public information.

3.8 Public Relations Policy

The [Public Relations Policy](#) establishes rules and guidance for Employees' communications with the Media relating to the Company.

3.9 Data Classification and Handling Standard

The [Data Classification and Handling Standard](#) outlines the enterprise method for classifying and handling of Company data.

4. Certification

The Company may require Employees and contractors to certify that they have reviewed this Policy, received training, and/or are in compliance with this Policy.

5. Exceptions

Any request for an exception to this Policy must be submitted in writing to the Human Resources Department, which should in turn escalate requests relating to media relations to Corporate Communications. Exception requests must be approved in writing by the Chief People and Outreach Officer.

6. Violations, Questions, and Reporting

Violations of this Policy may result in disciplinary action, up to and including termination of employment. All questions regarding this Policy should be communicated to the Human Resources Department through the respective Human Resources Business Partner, which should in turn escalate potential or actual violations of this Policy as it pertains to external and internal issues management to Corporate Communications and the Chief People and Outreach Officer. If you have concerns or need to report a violation of this Policy, contact your supervisor, the Human Resources Department, the Global Compliance and Ethics Group (Email: ethics@rccl.com), the Chief Compliance Officer (Email: compliance@rccl.com) or any of the other Compliance and Ethics contacts set forth in the Company's Code of Business Conduct and Ethics. You may also make a report through the Company's AWARE Hotline Program by phone at 1-888-81-AWARE (29273), extension **88 for shipboard employees, or online at RCLaware.ethicspoint.com.

The Company does not tolerate any kind of retaliation for reports or complaints made in good faith. For more information, please refer to the Company's [Reporting and Non-Retaliation Policy](#).

7. Definitions

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

Company: Royal Caribbean Cruises Ltd. and its wholly owned subsidiaries.

Confidential Information: non-public information the Company considers confidential, including without limitation, information, observations, procedures, practices, intellectual property, and data, whether written or oral, regarding:

- Any of the business, operations, affairs, or culture of the Company including, by way of example, financial projections, strategies, planning, research, developments, product designs or specifications, manufacturing processes, "know-how," prices, suppliers, customers, contemplated acquisitions, marketing plans, costs, workflow processes, and proprietary and/or trade secret information;
- Employees' personal and compensation-related information;
- Discussions, deliberations, and decisions relating in any manner to the Company's business; and
- Any information that a reasonable person would conclude is intended to remain confidential due to its nature or the circumstances under which it was learned.
- Confidential Information does not include information which is generally available to the public.

Corporate Communications: the Corporate Communications Department.

Department Head: the highest-level person (Vice President or above) and decision-maker for any given department.

Employee: any employee or officer of the Company shoreside or shipboard.

Social Media: internet, mobile and other electronic communication channels that people use to connect with others and share information, including websites and applications that allow users to create profiles, post content, and interact with others. Examples include, without limitation, X (Twitter), Instagram, Threads, LinkedIn, Facebook, Snapchat, Reddit, TikTok, Pinterest, YouTube, Yelp, Cruise Critic, Trip Advisor, blogs,

discussion forums, chat rooms and any other electronic communication channels where text, images, videos, and/or other data can be posted or shared.

8. Policy Administration and Governance

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

Chief Executive Officer

The Chief Executive Officer is responsible for the approval of this Policy and approving any amendments to this Policy.

Chief People and Outreach Officer

The Chief People and Outreach Officer is responsible for overseeing this Policy and proposing any amendments to this Policy to the Chief Executive Officer. The Chief People and Outreach Officer is also responsible for approving any exceptions to this Policy.

Human Resources Department

The Human Resources Department is responsible for administering this Policy, answering questions and providing guidance under this Policy, and reviewing it on an annual basis to determine if any amendments are appropriate and proposing any such amendments to the Chief People and Outreach Officer. The Human Resources Department is also responsible for reviewing any requests for exceptions to this Policy and proposing said requests to the Chief People and Outreach Officer for approval.

Corporate Communications Department

The Corporate Communications Department will assess and provide feedback and guidance with respect to this Policy as it relates to media relations, crises, and issues management.

Department Heads

Each Department Head is responsible for ensuring that the Employees within their department comply with this Policy.

This Policy must be reviewed by all parties below and approved by the Chief Executive Officer at least every three (3) years.

Owner:	<u>/s/ Dana Ritzcovan</u> Chief People and Outreach Officer	Date: <u>10/30/2024</u>
Reviewed by:	<u>/s/ Alex Lake</u> Chief Legal and Compliance Officer	Date: <u>10/31/2024</u>
Reviewed by:	<u>/s/ Christopher Rush</u> Chief Audit and Risk Officer	Date: <u>10/30/2024</u>
Reviewed by:	<u>/s/ Heather Hust Rivera</u> Chief Communications Officer	Date: <u>10/30/2024</u>
Approved by:	<u>/s/ Jason Liberty</u> Chief Executive Officer	Date: <u>10/31/2024</u>