



THE RITZ-CARLTON YACHT COLLECTION

SUPPLIER CODE OF CONDUCT FOR THE RITZ-CARLTON YACHT COLLECTION

INTRODUCTION

The Supplier Code of Conduct is a foundational document by which The Ritz-Carlton Yacht Collection (the “Company”) establishes standards and expectations guiding our relationships with vendors, contractors, service providers and other business partners supporting our worldwide operation.

Our Suppliers play an essential role in supporting the experiences we deliver to our guests and the operations that sustain our fleet. For this reason, we encourage all partners to carefully review this Code, understand its principles and integrate them into their own operations when working with The Ritz-Carlton Yacht Collection.

By adhering to these standards, The Ritz-Carlton Yacht Collection is looking to strengthen the relationships that support our business and reinforce the trust placed in us by our Guests and the communities in which we operate. Responsible business conduct, transparency, and respect for legal and ethical obligations are fundamental to maintaining the reputation and integrity of The Ritz-Carlton Yacht Collection.

STANDARDS OF BUSINESS CONDUCT AND ETHICS

The Ritz-Carlton Yacht Collection is committed to conducting business in full compliance with applicable laws and in accordance with the highest ethical and legal standards and expect our suppliers, contractors and business partners to operate with the same commitment to ethical conduct.

We encourage our Suppliers to use this Code to guide their actions, ensuring that their operations reflect responsible business practices and compliance with all relevant legal and regulatory requirements.

- **Business Integrity, Anti-Corruption**

The Ritz-Carlton Yacht Collection expects all suppliers to engage with integrity and in strict compliance with all applicable anti-bribery and anti-corruption laws and regulations. This includes, but is not limited to, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the OECD Anti-Bribery Convention, the EU Anti-Corruption Convention, the German Criminal Code (StGB), the Australian Criminal Code, the Hong Kong Prevention of Bribery Ordinance, the Singapore Prevention of Corruption Act, the Prevention of Corruption Act (India), and all other local laws in the jurisdictions where the company operates. Bribery and corruption, in any form, are strictly prohibited, and the company maintains a Zero-Tolerance Policy for any violations of these laws.

- **Protection of Company Assets and Intellectual Property**

Suppliers are expected to safeguard The Ritz-Carlton Yacht Collection’s assets, confidential information and intellectual property. Such information must only be used for legitimate business purposes and Suppliers must take all reasonable measures to prevent unauthorized access, misuse, loss, theft, or disclosure.

- **Disclosure of Business Information**

The Ritz-Carlton Yacht Collection expects suppliers to report all pertinent business information and records, including invoices, financial data and product information. All information is to be accurately documented and reflects the true nature of the business activity.



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- **Fair Dealing**

Suppliers are expected to deal fairly and honestly with The Ritz-Carlton Yacht Collection. Suppliers must not obtain an unfair advantage through fraud, misrepresentation, concealment of material facts, misuse of confidential information, or other improper business practices.

- **Gifts and Entertainment**

The Ritz-Carlton Yacht Collection's relationship with our Suppliers is based on informed business decisions and fair dealings. All suppliers are expected to ensure that any gifts, hospitality, or courtesies offered to the Company's representatives are reasonable, transparent and consistent with applicable laws and the company's Code of Ethics.

- **Conflicts of Interest**

The Ritz-Carlton Yacht Collection expects all business relationships to be conducted with transparency. Suppliers must avoid situations that create, or appear to create, a conflict between personal interests and their obligations while working with the Company. Such conflicts may arise from financial interests, outside employment, or relationships with family members or associates. Suppliers are expected to promptly disclose any situation that could be perceived as a conflict of interest.

- **Human Rights**

The Ritz-Carlton is committed to respecting internationally recognized human rights and expects all Suppliers to maintain the same commitment. All suppliers must conduct their operations in a manner consistent with applicable labor laws and internationally recognized human rights principles, including, but not limited to, those reflected in the United Nations Declaration of Human Rights and other relevant international standards.

SUPPLIER RESPONSIBILITY TO REPORT CONCERNS

The Ritz-Carlton Yacht Collection encourages all suppliers and their personnel to report concerns regarding suspected violations of this Code, unethical conduct, or potential legal or regulatory breaches. Such reports may include concerns related to fraud, corruption, labor violations, environmental misconduct, or other improper activities connected with the Company's operations.

The Ritz-Carlton Yacht Collection prohibits retaliation against any individual who, in good faith, reports questionable behavior or non-compliance with this Code.

Suppliers are expected to cooperate reasonably with the Company in reviewing or investigating potential violations related to their business relationship with The Ritz-Carlton Yacht Collection.