



Ethics & Compliance Key Performance Indicators

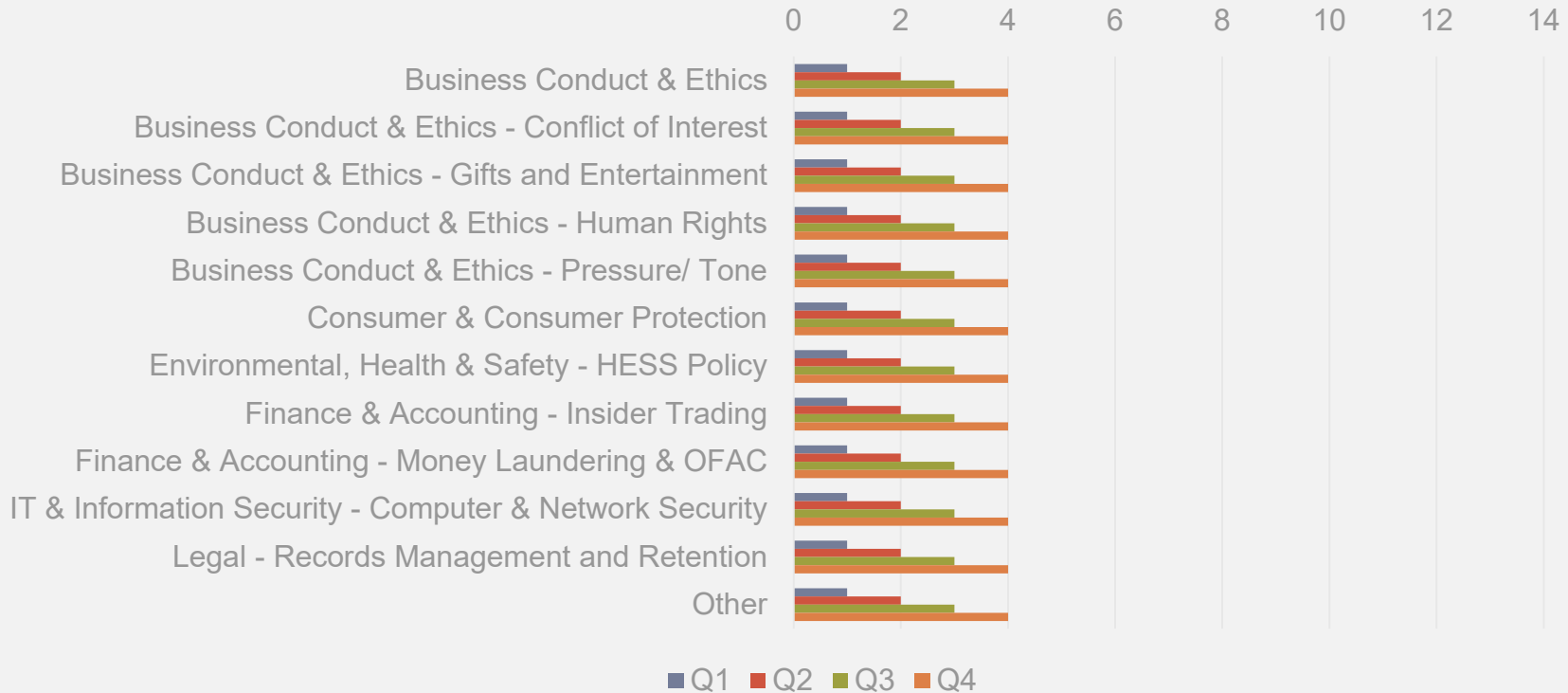
Quarter 4, 2018

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HA Group E&C Communications Q1-Q4

2018



E&C Communications

Quarter 4

Delivery Date	Status	Audience	Communication Vehicle	Topic	Input + Key Messages
9/01/2018	Completed	Shoreside	Internal Communication - Email	Business Conduct & Ethics	This Week in Santa Clarita – All employees to read updated Code of Conduct
9/02/2018	Completed	Shoreside	Information Session - Town Hall	Consumer & Consumer Protection	Discussion regarding privacy and consumer protection
9/03/2018	Completed	Shoreside and Shipboard	Intranet - Article	Legal - Records Management and Retention	Article regarding our records management system
9/04/2018	Completed	Shoreside	Internal Communication - Email	Finance and Accounting – Money Laundering & OFAC	Quarterly email to OFAC screeners
9/05/2018	Completed	Shoreside and Shipboard	Intranet – HESSS Newsletter	Environment, Health & Safety - HESSS Policy	"HA Group Works for a Cleaner Environment" - At Holland America Group, we're committed to managing the environmental aspects of our operations.

Required Shoreside E&C Training Courses

- All courses required every 2 years
 - Anti-Money Laundering Policy
 - Anti-Trust Policy
 - Avoiding Bribery and Corruption
 - Code of Business Conduct and Ethics
 - OFAC Compliance Policy
 - Valuing Employees' Concerns and Preventing Retaliation

Shoreside Training Curriculum

The following courses must be assigned to employees within 30 days of being hired or promoted to the listed positions. Course completions are valid for two years.

- **Anti-Money Laundering Policy**
 - All employees at the Director level or above
 - All employees in Casino Operations
- **Anti-Trust Policy**
 - All employees at the Director level or above
 - Employees expected to attend trade association meetings
- **Avoiding Bribery and Corruption**
 - All employees at the Manager level or above
 - Shoreside employees with responsibility for reviewing and approving invoices
 - Shoreside employees involved in oversight or day-to-day operations of joint ventures to which the company is a party
- **Code of Business Conduct and Ethics**
 - All members of the Boards of Directors
 - All employees
- **OFAC Compliance Policy**
 - All employees at the Director level or above
 - Employees involved in sanctions screening activities
- **Valuing Employees' Concerns and Preventing Retaliation**
 - All employees at the Manager level or above

HA Group E&C Shoreside Course Completion Rates

- Quarter 4, 2018 Data
- Cells highlighted in red indicate a failure to meet the target completion rate (90%)
- Anti-Money Laundering Policy, Avoiding Bribery and Corruption, Code of Business Conduct and Ethics, OFAC Compliance Policy, and Valuing Employees' Concerns and Preventing Retaliation have the highest shoreside completion rates
- Anti-Trust Policy has the lowest completion rate (50%)

Course	Amount Assigned	Amount in Compliance	Amount Past Due	Completion Rate
Anti-Money Laundering Policy	1000	999	1	99%
Anti-Trust Policy	100	50	50	50%
Avoiding Bribery and Corruption	500	490	10	98%
Code of Business Conduct and Ethics	1000	1000	0	100%
OFAC Compliance Policy	100	90	10	90%
Valuing Employees' Concerns and Preventing Retaliation	500	480	20	90%

Required Shipboard E&C Training Courses

- All courses required every 2 years
 - Anti-Money Laundering Policy
 - Anti-Trust Policy
 - Avoiding Bribery and Corruption
 - Code of Business Conduct and Ethics
 - OFAC Compliance Policy
 - Valuing Employees' Concerns and Preventing Retaliation

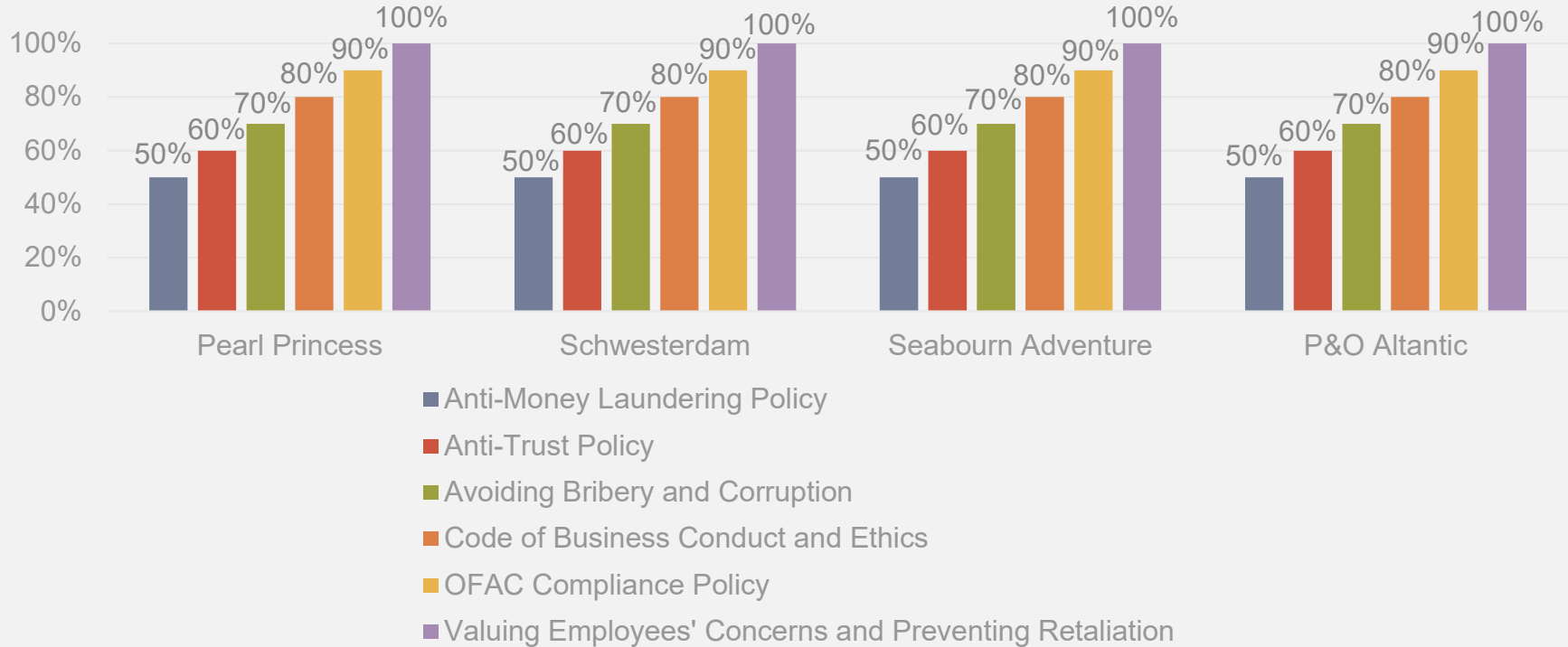
Shipboard Training Curriculum

The following courses must be assigned to employees within 30 days of being hired or promoted to the listed positions. Course completions are valid for two years.

- Anti-Money Laundering Policy
 - All employees at the Director level or above
 - All employees in Casino Operations
- Anti-Trust Policy
 - All employees at the Director level or above
 - Employees expected to attend trade association meetings
- Avoiding Bribery and Corruption
 - All employees at the Manager level or above
 - Employees with responsibility for reviewing and approving invoices
 - Employees involved in oversight or day-to-day operations of joint ventures to which the company is a party
- Code of Business Conduct and Ethics
 - All members of the Boards of Directors
 - All employees
- OFAC Compliance Policy
 - All employees at the Director level or above
 - Employees involved in sanctions screening activities
- Valuing Employees' Concerns and Preventing Retaliation
 - All employees at the Manager level or above

E&C Shipboard Course Completion Rates

Quarter 4, 2018



Total Course Completion Rates by Ship

Quarter 4, 2018

HA Group Ship	Total Amount of Courses Assigned	Total Amount of Courses Completed	Total Amount of Courses Not Completed	Completion Rate
Pearl Princess	1000	800	200	80%
Schwesterdam	2000	1800	200	90%
Seabourn Adventure	500	450	50	90%
P&O Atlantic	200	100	100	50%

- Cells highlighted in red indicate a failure to meet the target completion rate (90%)
- Schwesterdam and Seabourn Adventure have the highest overall course completion rates (90%)
- P&O Atlantic has the lowest overall course completion rate (50%)

Course	April 2018
Anti-Money Laundering Policy	50%
Anti-Trust Policy	60%
Avoiding Bribery and Corruption	70%
Code of Business Conduct and Ethics	80%
OFAC Compliance Policy	90%
Valuing Employees' Concerns and Preventing Retaliation	100%

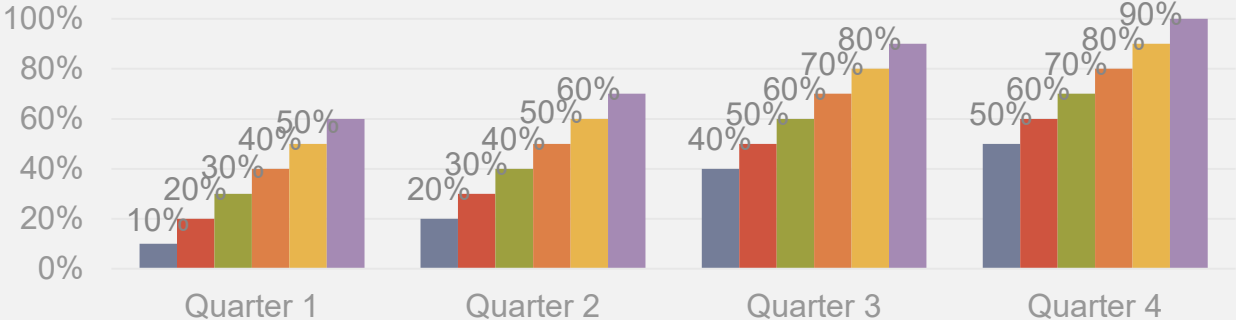
Shipboard Course Completion Rates

Quarter 4, 2018

- Cells highlighted in red indicate a failure to meet the target completion rate (90%)
- Strong completion rates for OFAC Compliance Policy and Valuing Employees' Concerns and Preventing Retaliation courses
- Weaker completion rates for Anti-Money Laundering Policy, Anti-Trust Policy, Avoiding Bribery and Corruption, and Code of Business Conduct and Ethics courses

Overall E&C Shipboard Course Completion Rates per Quarter

Quarter 4, 2018



- Anti-Money Laundering Policy
- Anti-Trust Policy
- Avoiding Bribery and Corruption
- Code of Business Conduct and Ethics

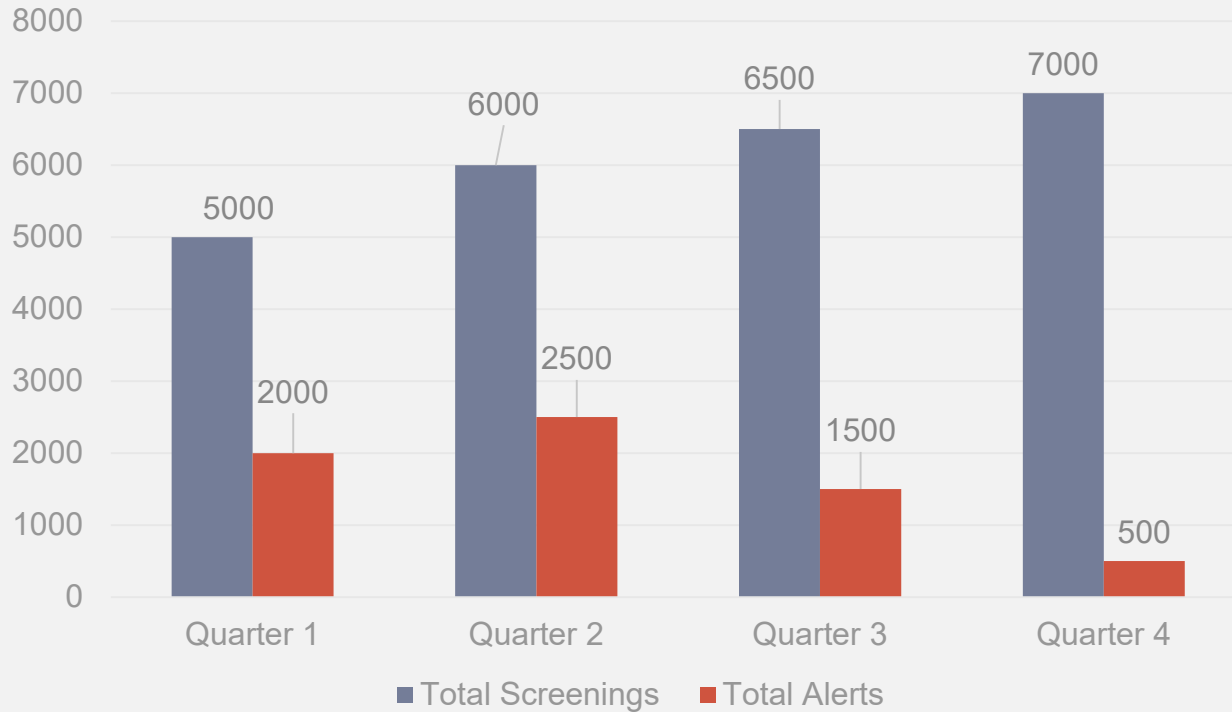
Course	Shore Completion Rates	HA Group Ship Completion Rates
Anti-Money Laundering Policy	99%	50%
Anti-Trust Policy	50%	50%
Avoiding Bribery and Corruption	98%	70%
Code of Business Conduct and Ethics	100%	60%
OFAC Compliance Policy	90%	90%
Valuing Employees' Concerns and Preventing Retaliation	90%	100%

Shoreside and Shipboard Overall Completion Rates

- Cells highlighted in red indicate a failure to meet the target completion rate (90%)
- Strong overall shoreside completion rates
- Strong shipboard completion rates for OFAC Compliance Policy and Valuing Employees' Concerns courses
- Weaker shipboard completion rates for Anti-Money Laundering Policy, Anti-Trust Policy, Avoiding Bribery and Corruption, and Code of Business Conduct and Ethics courses
- Weaker shoreside Anti-Trust Policy completion rate

Economic Sanctions Compliance

Screening Results per Quarter



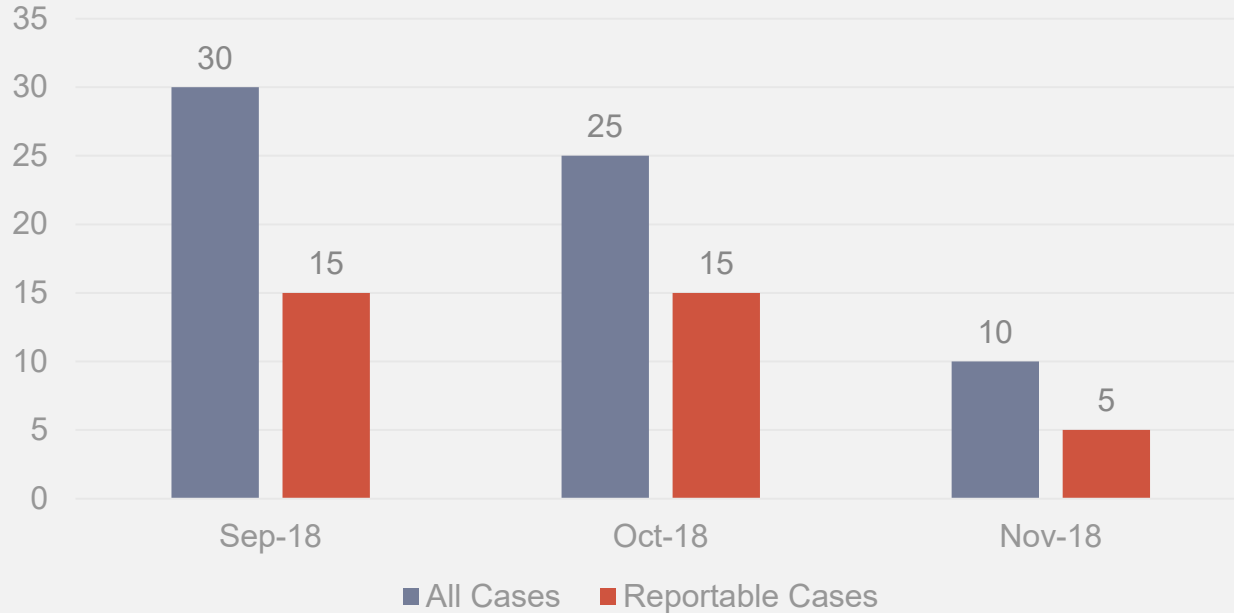
Economic Sanctions Compliance

Types of Alerts per Quarter



Hotline Statistics – Reporting Trends

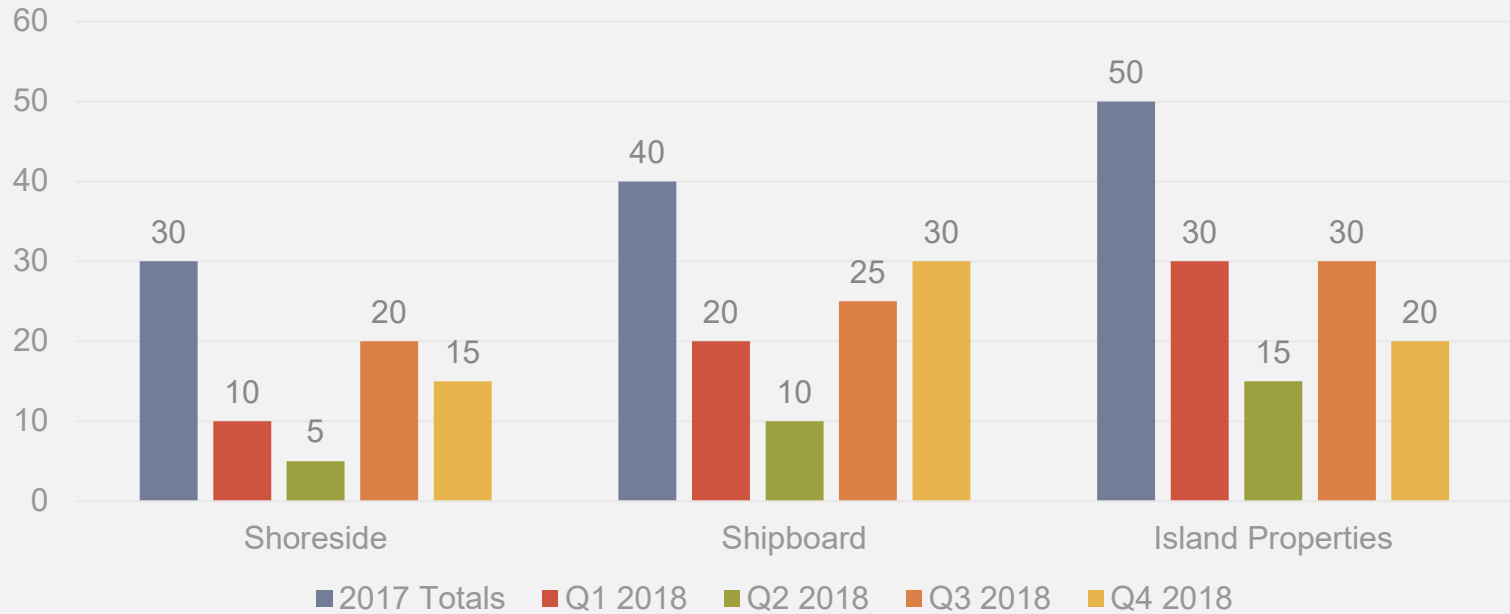
Q4 2018 Reportable Cases vs. All Cases¹



1. “Reportable Matters” are defined in the Reporting of Improprieties Policy and do not including hotline tests, customer relations, or employee relations issues.

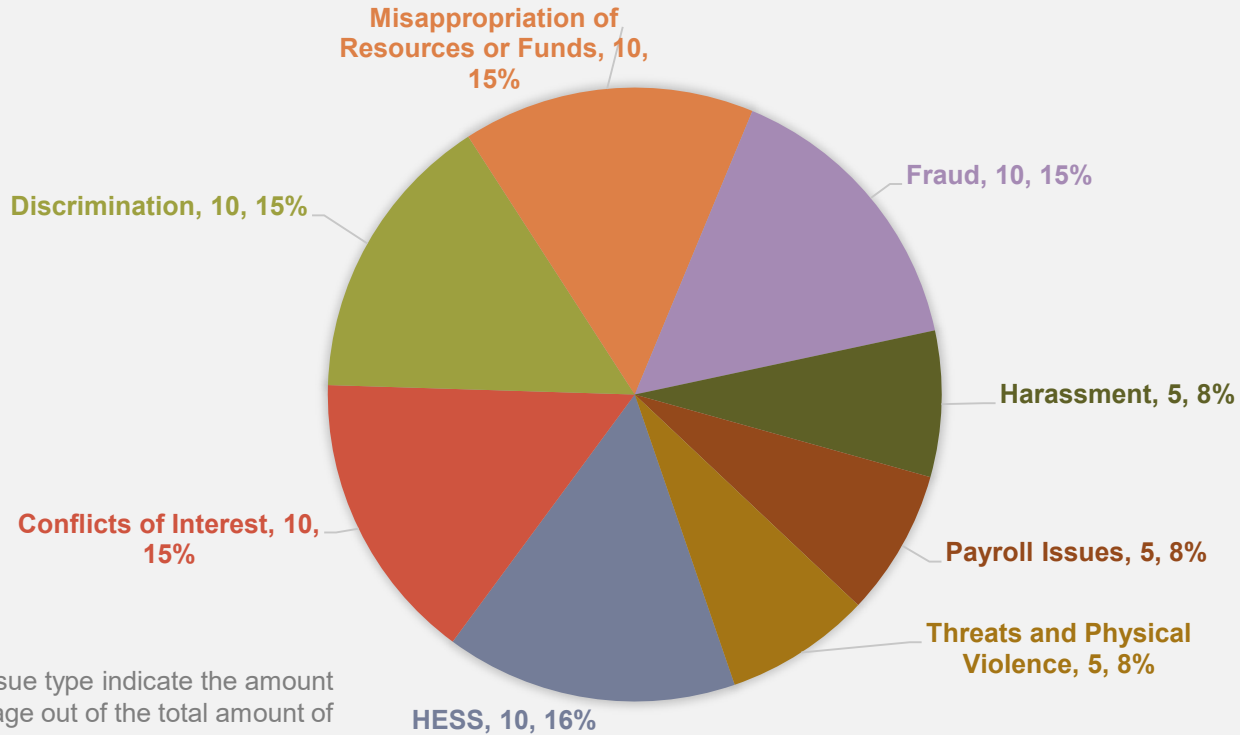
Hotline Statistics – Reporting Trends

Amount of Reported Matters by Location



Hotline Statistics – Issue Types Reported

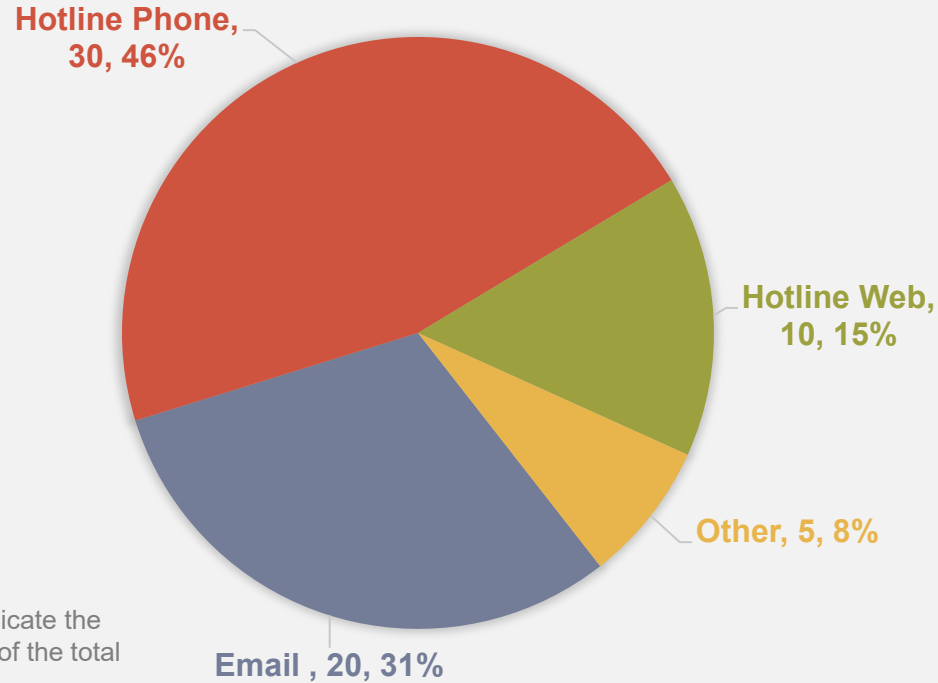
REPORTABLE MATTERS PER ISSUE TYPES (SEP 2018 - NOV 2018)¹



1. Numbers next to the issue type indicate the amount of cases and the percentage out of the total amount of cases

Hotline Statistics – Intake Method

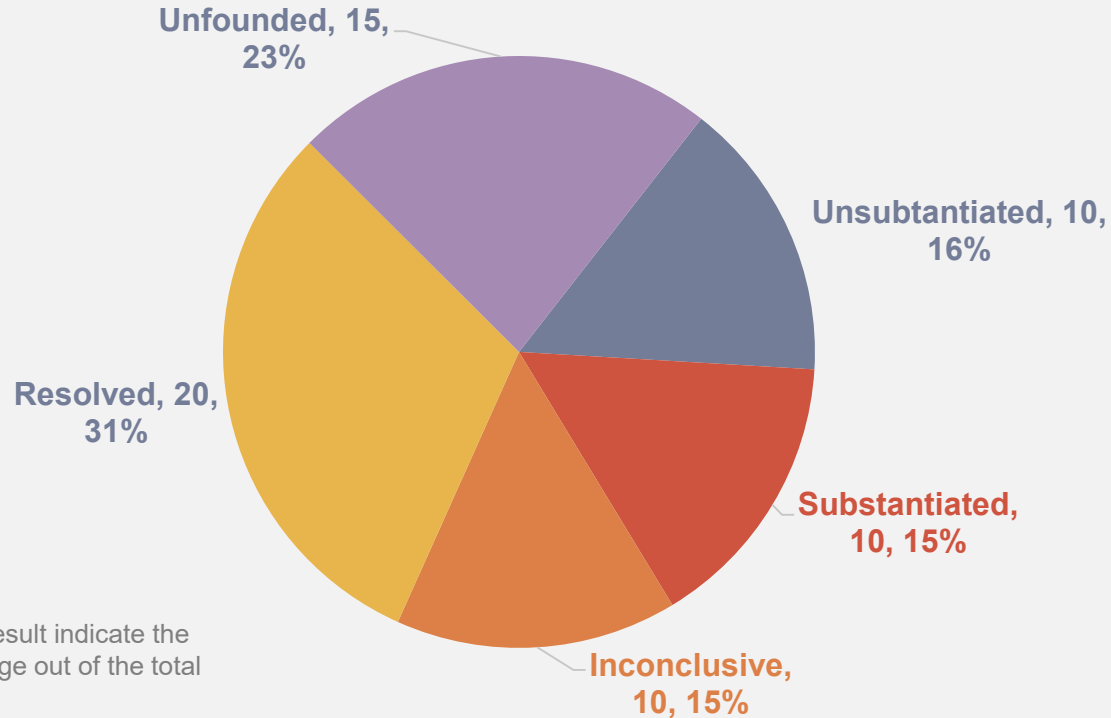
SUMMARY – INTAKE METHOD OF REPORTABLE MATTERS (SEP 2018 – NOV 2018)¹



1. Numbers next to the intake method indicate the amount of cases and the percentage out of the total amount of cases

Hotline Statistics – Outcome Results

OUTCOME RESULTS OF REPORTABLE MATTERS
SEP 2018 – NOV 2018¹



1. Numbers next to the outcome result indicate the amount of cases and the percentage out of the total amount of cases

All E&C Services Department Goals

Goal Title	Description/ Thoughts	To do/ Tasks	Timing/ Update