

Employee Handbook

August 2013



Every employee of Starboard Cruise Services, Inc. must read, attest and have access to this manual at all times. Employees are expected to abide by and follow all sections and directives included in this manual. Failure to do so may result in disciplinary action up to termination.

Total number of Annual Guests:

3,836,615

Royal Caribbean 24 ships

Aurora	Alibi	Atlantica	Enchantment	Explorer	Freedom	Grandeur	Jewel	Legend	Liberty	Majesty	Norway
174,476	205,987	73,741	113,379	152,568	210,093	105,481	88,549	136,656	220,814	261,520	127,850
LUXURY											LUXURY

Monarch	Navigator	Odyssey	Radiance	Regency	Serenade	Sovereign	Titan	Ultara	Ultara	Ultara	Ultara
259,383	196,487	305,800	106,976	83,871	120,858	74,532	170,199	168,291	218,430	218,430	218,430
		LUXURY						LUXURY	LUXURY	LUXURY	LUXURY

637,184

Celebrity 10 ships

Century	Constellation	Infinity	Minimorum	Sunset	Signature	Eclipse	Equinox	Galactic	Reflection
92,482	58,835	66,795	105,340	96,971	41,956	130,072	150,072	100,072	158,392
					LUXURY				LUXURY

Legend	Liberty	Magic	Melanie	Paradise	Prism	Sensation	Spirit	Stargazer	Summit	Vista	Victory
111,489	175,730	103,801	109,355	252,196	132,315	259,234	119,337	158,195	213,237	171,135	166,401

4,173,144

Carnival 23 ships

Conquest	Destiny	Getaway	Glacier	Harmony	Imperial	Legend	Liberty	Next	Parade	Prism	Sensation	Spirit	Stargazer	Summit	Vista	Victory
177,267	245,507	224,554	227,565	194,955	194,655	189,876	174,942	202,723	257,199	165,961	111,489	175,730	103,801	109,355	252,196	132,315

Legend	Liberty	Magic	Melanie	Paradise	Prism	Sensation	Spirit	Stargazer	Summit	Vista	Victory
111,489	175,730	103,801	109,355	252,196	132,315	259,234	119,337	158,195	213,237	171,135	166,401

STARBOARD'S GLOBAL FLEET

3,750,075

Costa 15 ships

Aurora	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia	Costa Concordia
10,492	66,229	97,544	85,676	136,179	113,475	126,892	91,358	46,630	107,990	165,548				

Venice	Venice	Venice
104,111	2,305,111	158,000

856,779

Holland America 15 ships

Amsterdam	Maasdam	MS Eurodam	MS Nieuw Amsterdam	MS Rotterdam	MS Westerdam	MS Zuiderdam	MS Noordam	MS Oostdam	MS Westerdam	MS Zuiderdam	MS Noordam	MS Oostdam	MS Westerdam	MS Zuiderdam	MS Noordam
24,758	36,475	87,706	72,589	83,000	97,200	12,362	31,378	52,414	44,008	46,915					

Maasdam	Westerdam	Zuiderdam	Noordam
40,031	88,156	53,763	77,399

246,889

Iberia 4 ships

Celebration	Hokkaido	Mitoh
64,053	81,154	73,647

427,429

Norwegian 3 ships

Epic	Broadway	Colorado
219,429	208,000	180

12,133,201

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Acknowledgment and Receipt

I have received my copy of the Employee Handbook.

The employee handbook describes important information about Starboard Cruise Services, Inc. and I understand that I should consult my Gift Shop Manager, Home Office Leadership or Human Resources regarding any questions not answered in the handbook. I have entered into my employment relationship with Starboard Cruise Services, Inc. voluntarily and acknowledge that there is no specified length of employment.

This manual and the policies and procedures contained herein supersede any and all prior practices, oral or written representations, or statements regarding the terms and conditions of my employment with Starboard Cruise Services, Inc.

I understand that a policy and practice may be changed at any time by Starboard Cruise Services, Inc., and the company reserves the right to change my hours, wages and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the President of Starboard Cruise Services, Inc. has the ability to adopt any revisions to the policies in this handbook.

I understand and agree that nothing in the Employee Handbook creates, or is intended to create, a promise or representation of continued employment and that employment at Starboard Cruise Services, Inc. is a six-month employment agreement, which may be terminated at the will of either Starboard Cruise Services, Inc. or myself. Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I understand and agree that employment and compensation may be terminated with or without cause and with or without notice at any time by Starboard Cruise Services, Inc. or myself.

I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Employee's Signature/ Date

Employee's Name (Print / Date)

Confidentiality

For purposes of this policy, the “Company” refers to Starboard Cruise Services, Inc., and any other company that may in the future become a member of the group of companies under common administration with Starboard Cruise Services, Inc. This policy applies to all Company employees, temporary workers, and independent contractors who perform work on Company premises.

It is the policy of the Company to safeguard its trade secrets and other confidential and proprietary information (collectively referred to in this policy as “Confidential Information”). It is critical, therefore, that every Company employee understands the importance of protecting Confidential Information and understand the Company’s expectations of all employees in upholding the Company’s Confidentiality Policy.

Like many other Company assets, Confidential Information is of economic value to the Company. However, Confidential Information is valuable to the Company only as long as it is kept secret. Once information becomes generally known, it loses its economic value because it gives no competitive advantage to the Company. The Company’s Confidential Information is a collection of information that has been developed over time through the efforts of Company employees and through the Company’s substantial investment in business development, marketing and merchandising. The result of these efforts is a pool of information that enables the Company to successfully conduct its business.

1. Identifying Confidential Information

1.1 Confidential Information typically describes some aspect of the Company’s business, plans or employees and includes any information that is not generally (known) in the public domain and that is useful or helpful to the Company and/or which could be useful or helpful to competitors of the Company. Confidential Information may be contained in tangible form, such as memoranda, reports and handwritten notes, or in intangible form, such as an employee’s mind, telephone conversations, or computer memory (including personal or company emails).

1.2 Confidential Information may concern, but is not limited to, for example: the nature, number and identity of the Company’s customers; customer spending levels, patterns, and habits; the identities and nature of the Company’s business relationships with its suppliers, vendors or Cruise Line partners; cost and pricing information and policies; profits and profit margins; sales and sales forecasts; market analyses; source of supplies, goods and services sold by the Company; the choice, costs, and prices of merchandise; plans for the Company’s future business operations, including strategic plans, forecasts, new services, products and product lines, new methods of doing business, and new business locations; the Company’s financial position, lines of credit, sources of investment capital and other financial information; the Company’s methods of doing business; information regarding the Company’s computer systems, programs, and databases; and payroll, employee data, training, and other Human Resources records.

2. Guide to Protecting Company Confidential Information

2.1 Confidential Information should be disclosed to others within the Company only on a need-to-know basis. To this end, employees should exercise care to ensure that materials containing Confidential Information cannot be inadvertently or intentionally viewed by visitors or others not authorized to have access to such information; materials containing Confidential Information should be marked as “Confidential” and stored in a locked and secure location to protect against misplacement or theft; employees should partner with the Gift Shop Manager and/or Home Office Leadership (Director,

District Manager, HR partner) when removing Confidential Information from the ship, building, including traveling with company issued materials or equipment including laptop computers, and should take all practicable steps to prevent the improper disclosure of Confidential Information. Employees should be particularly sensitive to the protection of Confidential Information in preparing for and participating in competitive bids.

Measures which you should take to protect the confidentiality of Company information include:

- Ensure the physical security of our office and your office or workspace.
- Restrict access to Company premises by visitors.
- Ensure that sensitive information is kept in secure places.
- Do not transmit or remove reports or files containing confidential Company data from Company premises except when necessary to transfer data to accomplish an important work assignment.
- Take care that confidential information not be inadvertently disclosed. For example, reading documents in public places such as on airplanes, where others might be able to see them.
- Ensure that confidential information is secure and that access to it is carefully restricted to those Company individuals who have a need to know such information.
- Lock file cabinets, desk drawers and office doors at the end of each day.
- Exercise caution in verbal communications.
- Carefully read the Company's Confidentiality Policy to understand what information is regarded as confidential and proprietary.
- Notify your supervisor immediately should you become aware of a threat to the security of the Company's confidential information.

2.2 As a general rule, Confidential Information should not be disclosed to anyone outside the Company.

2.3 When there is a legitimate commercial reason for disclosing Confidential Information outside of the Company, it should be done only in conjunction with an appropriate Confidentiality Agreement, which can be provided by the Legal Department.

2.4 Always be careful to avoid inadvertent disclosures that may arise in either social conversation or in normal business relations.

3. Guide to Handling Confidential Information of Third Parties

3.1 Confidential information of third parties should not be received by any Company employee except (i) when there is a legitimate commercial reason for doing so, and (ii) pursuant to a written confidentiality agreement that can be supplied by the Company's Legal Department.

3.2 While remaining competitive means being alert to the competitive surroundings and obtaining information about the markets in which the Company operates, Company employees must do so only in accordance with sound and ethical practices. No Company employee should ever be a party to a situation in which confidential information has been improperly obtained from another company or individual. If any Company employee is approached with an offer of confidential information belonging to a third party that the employee has reason to believe may have been obtained improperly, the employee must immediately discuss the matter with his or her immediate supervisor and/or the Company's lawyers. In the competitive bid environment, employees should be particularly sensitive to

the receipt of confidential information of third parties and should adhere to the highest standards of ethical conduct in connection with information gathering relevant to any competitive bid.

3.3 All new employees joining the Company from other organizations must realize that the Company's policy is to respect the confidential information of the previous employers of our employees, and that no such information should be brought to us or used by the employee in his or her work for the Company.

4. Questions about Compliance with This Policy

4.1 Any employee with a question about the requirements of, or compliance with, this Policy should contact the Director of Human Resources.

5. Policy Changes

5.1 The Company may, in its discretion, amend, replace or terminate this policy at any time.

Media Relations

The Company has established procedures for responding to inquiries from the media and for obtaining management approval of public statements concerning the Company's business.

Employees (including Management) of Starboard Cruise Services, Inc. are not allowed to make any statements to the media regardless of the geographical location.

Only specifically designated senior executives and certain outside consultants have been authorized to speak on behalf of the Company. Any inquiries from the media coming to any other employees should be referred to the President, CFO or Senior Vice -President of Human Resources.

Social Media and Website Policy

Social media has changed the way we communicate. Information is spread faster to a broader audience with many more possible interactions. This can result in a wide range of repercussions. Because we are employees of the LVMH Group, we also contribute to shaping its reputation and image. These guidelines concern all participation in social media. They apply to all of us, as employees of LVMH Group companies and in all our references to an LVMH Group company (whether or not you have identified that you work for LVMH). We are all bound by principles of good faith and confidentiality requirements.

Social media guidelines*for LVMH Group employees:

Platforms for publishing content generated by Internet users, such as social networking sites:

- Facebook
- Twitter
- LinkedIn
- Viadeo
- Photo and video sharing sites (YouTube, Daily motion, Pinterest, Instagram, etc.),
- Blogs
- Forums
- Wikis
- Other related sites

The LVMH Group is also mindful of the need to maintain and protect the privacy of all its employees. When a Manager or employee uses a social media platform in a personal capacity, whatever you write online remains public for a long time, and the distinction between public and private can be blurred or shifting. These guidelines therefore include recommendations for your participation in social media outside your job.

Respect the rules

All prevailing legislation and regulations, as well as all applicable policies within the LVMH Group and at individual Group companies (employment contract, corporate rules, code of conduct, IT policy, social media guidelines, etc.) also apply to the use of social media. Disciplinary action for breaching these policies extends to social media. You are responsible for being conversant with all company rules and policies and you are expected to comply with them when you participate in social media.

Respect confidentiality

It is important to comply with Starboard Cruise Services, Inc. confidentiality policy. Make sure you do not disclose any confidential or classified information (financial or product information, business strategy of the LVMH Group and its brands, names of partners, customers or suppliers) or any information about Group employees or contractors. If you are unsure about whether to post information or require clarification about its confidentiality, do not disclose the information and check with your manager before proceeding.

Exercise caution

If you read any complaints, comments or suggestions concerning the LVMH Group or its companies in social media:

- do not take the initiative to reply;
- report them to the District Manager or Human Resources Department at Starboard Cruise Services, Inc.

Understand your responsibility

When you participate in social media in a personal capacity, you are also impacting LVMH Group's image through the content you publish. You should keep in mind that you are responsible for what you write and ask yourself whether it is relevant to express your opinion in that particular context.

Respect your readers

Your posts must be respectful of all individuals. Please respect the opinions of other people about topics that may be controversial and do not post material that is:

- fraudulent or misleading;
- offensive or defamatory;
- obscene or pornographic
- aggressive or incites discrimination, hatred or violence.

Respect the rights of third parties and adhere to disclosure and sharing rules

Follow applicable legislation for copyright, trademarks, drawings and models and personality rights, including authorization to reproduce physical likeness. Do not reproduce, copy, use, distribute, modify or adapt any logos, works, videos, photographs, etc. without having obtained the prior approval of the owners of the intellectual property rights for the relevant content.

If an employee has any questions, they can notify their District Manager or Human Resources at Starboard Cruise Services, Inc.

Employees, who have a personal website or weblog and who choose to identify themselves as a Starboard Cruise Services Inc. employee or to discuss matters related to our business on their website or weblog, must adhere to the Company's guidelines to eliminate any misconceptions that they are speaking on behalf of the Company.

Procedure

Managers/employees are required to observe the following guidelines when posting Company-related information on social media, personal websites, or weblogs:

- Make it clear to website or blog readers that personal views expressed do not necessarily reflect the views of Starboard Cruise Services, Inc. To help reduce the potential for confusion, the following statement should be posted in a reasonably prominent place on your site (e.g., at the bottom of your "about me" page): "The views expressed on this website/weblog are mine alone and do not necessarily reflect the views of my employer."
- A disclaimer should also be placed on the front page saying who you work for, but that you are not speaking officially. While it is not necessary to post this notice on every page, reasonable effort should be made to draw attention to this from the home page of your site.
- Avoid disclosing any information that is confidential or proprietary to Starboard Cruise Services, Inc. or to any third party that has disclosed information to us. For good measure, review Starboard Cruise Services, Inc. Confidentiality policy for guidance about what constitutes confidential information.

- Employment documents give the company certain rights with respect to concepts and developments you produce that are related to our business. To avoid conflicts or discrepancies, you should consult your Management team or Human Resources Manager/Specialist if you have questions about the appropriateness of publishing such concepts or developments related to the company's business on your site.
- Since your site or blog is a public space, you should be as respectful to the company, our employees, our customers, our partners and affiliates, and others (including our competitors) as the company itself endeavors to be.
- You may provide a link from your site to the corporate website. However, you must receive permission to use company trademarks or reproduce company material on your site.
- The company may request that you temporarily confine your website or weblog commentary to topics unrelated to the company (or, in rare cases, that you temporarily suspend your website or weblog activity altogether) if necessary or advisable to ensure compliance with securities regulations or other laws.

Maritime Labor Convention 2006

Maritime Labor Convention 2006 (MLC)

MLC 2006 is a comprehensive International Labor Convention that was formed by the International Labor Organization (ILO).

Effective, August 20, 2013 all articles and titles will become legally binding for all ship owners and seafarers.

A **seafarer** is defined as any person who is employed, engaged or working in any capacity on board a ship.

The Regulations of the MLC 2006 are organized under five Titles.

- **Title 1:** Minimum requirements for seafarers to work on a ship
- **Title 2:** Conditions of employment
- **Title 3:** Accommodation, recreational facilities, food and catering
- **Title 4:** Health protection, medical care, welfare & social security protection
- **Title 5:** Compliance and enforcement

CRUISE LINE INSPECTION

- The Management team must ensure they are adhering to MLC compliance as outlined in training provided by the respective cruise line and Starboard Cruise Services, Inc.
- It is the management team's responsibility to review and become familiar with the Starboard Cruise Services, Inc. Compliance Checklist form to ensure they are able to answer or provided documentation requested by an auditor.
- Each manager is required to schedule time each month to review Starboard Cruise Services, Inc. Compliance Checklist form to ensure success for any scheduled or non-scheduled MLC audits.

SEAFARER COMPENSATION FOR THE SHIP'S LOSS OR FOUNDERING

- In the event of a ship loss or foundering, Starboard Cruise Services, Inc. will ensure all seafarers are protected from being stranded in a foreign port. In addition, a seafarer will reside in a company approved hotel and will receive commission pay based on an average rate of the 4 weeks prior to the period of disembarkation in addition to their regular base pay. Any stranded seafarer will be immediately transferred to another ship owner or voluntarily repatriated home. Payroll payments will be made through the company's Ocean Pay payroll system not to exceed the minimum amount by the flag state.

SEE APPENDIX

Scheduling & Time Keeping

Gift Shop Managers shall answer any questions that employees have regarding the following issues: working conditions, working hours, and any other matters pertaining to safe working conditions.

WORK SCHEDULE

In general, the ordinary hours of work shall not normally exceed 14 per day in any 24 hour period and 72 hours in any seven-day period. A week of work is calculated from Sunday thru Saturday.

- Hours of rest must be at least 10 hours in any 24-hour period and 77 hours in any seven-day period.
- No changes to the work schedule may be made without prior approval of the Gift Shop Manager (24 hour notice).
- It is the employee's responsibility to know and adhere to their assigned work schedule.

The Gift Shop Manager will assign working hours to employees at the beginning of each week (Sunday-Saturday).

Altering, falsifying, tampering with working hours, or recording time on another employees time records may result in disciplinary action, up to and including termination of employment. It is the employee's responsibility to record their working hours and certify the accuracy of all time recorded. The Gift Shop Manager is responsible to review and validate all time keeping before submitting it to the cruise line or Home Office.

UPDATED SCHEDULES

Work schedules can be revised at any time based on management discretion to meet business needs. In addition, if corrections or modifications are made to work schedules, both the employee and Gift Shop Manager should verify the changes by initialing a copy of the revised document.

ACCOUNTABILITY

It is the Gift Shop Manager's responsibility to audit hours worked vs. scheduled hours. If an employee or Manager does not adhere to their assigned schedule, the Gift Shop Manager is required to track and document all variances in the employee's TED file. After three occurrences are listed in the associate's TED file, the GSM is required to issue a corrective action (verbal, written, and final warning). If an employee receives a final warning, continuation of their current contract will be reviewed by the Home Office and may lead to termination.

RECORD RETENTION: *The Management team is required to file every posted schedule and not to discard them (including revised schedules). Schedules should be filed by month (January-December) and stored onboard for three years unless retention requirements are specified differently by the ship owner.*

ANTI-BRIBERY POLICY

It is the policy of Starboard Cruise Services, Inc. (“Starboard”) to conduct its business in compliance with all applicable anti-bribery laws. For purposes of this policy, anti-bribery laws include the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, and the anti-bribery laws of any other country that Starboard determines may apply to its operations.

Starboard will not pay, offer, or promise to pay, or authorize the payment, directly or indirectly, through third persons or otherwise, of any monies or anything of value to any government official or government contractor of any country (that is, to any officer or employee of a government or any department, or any state-owned enterprise, agency or other body, or any public international organization, or any person acting in an official capacity for or on behalf of the foregoing), or to any political party, official thereof or candidate for political office, for the purpose of:

1. Influencing any official act or decision by such government official, person or party, or
2. Inducing such government official, person or party to perform or omit any act in violation of his or its lawful duty, or
3. Securing any improper advantage, or
4. Inducing such government official, person or party to use his or its influence with a government or any of its agencies or instrumentalities to affect or influence any act or decision of such government or agency or instrumentality in order to obtain, retain or direct business for, with or to any person or entity, or
5. To induce any other action that is illegal or is a breach of trust.

Entertainment:

This policy prohibits Starboard Shipboard Employees from providing hosted entertainment.

This policy does not prohibit Starboard Corporate Office Employees from providing reasonable, hosted entertainment to promote good business relations. However, no person may provide to any of the foregoing recipients on behalf of Starboard lavish or excessive entertainment, gifts or entertainment which is not hosted and attended by a Starboard employee. No Starboard employee will be subject to corrective action or adverse consequences for refusing to pay bribes, declining to provide excessive entertainment or make facilitation payments, as defined below, even if it means that Starboard loses business because of the refusal.

Facilitation Payments:

Facilitation payments, sometimes known as grease payments, are small amounts, gifts or things of value demanded to secure, hasten or “facilitate” government or official services, such as connecting a telephone or obtaining a visa, or can be inducements offered to or solicited by customs, immigration and other officials to speed up the granting of clearance, services and permits. If appropriate, Starboard may pay for faster official service at publicly posted rates, if the payment is made transparently to the government organization or department and an official receipt obtained, because payments under such conditions are not facilitation payments. If a Starboard employee has doubts about whether a payment is a facilitation payment, seek written approval from the Senior Vice-President (SVP) Finance in advance. Facilitation payments are prohibited by this policy, subject to the following exception. If a facilitation payment is demanded under threat to the employee’s personal security or significant and immediate forfeiture of Starboard assets, and only after the employee has exhausted all possible options of contacting superiors through the chain of command, the facilitation payment should be paid, and immediately (within 24hrs) after the threat is avoided, a detailed written report of the circumstances and amount of the payment should be made to SVP Finance. Starboard will take appropriate steps to avoid a recurrence of the circumstances of the coerced payment. Starboard will require that Shipboard Management, Home Office and Distribution Center Management employees have read and agree to comply with this policy. Violations of this policy by Starboard employees may result in corrective action up to and including termination of employment. The SVP Finance of Starboard shall be responsible for implementing and communicating this policy, including, but not limited to:

1. Liaising with the Starboard Finance function to put into place controls designed to ensure that bribes are not hidden in off the books accounts or by inadequate or inaccurate descriptions or false accounting entries;
2. Investigating, together with other Starboard functions and legal counsel as appropriate, reports of violations of this policy; and
3. Preparing a report for the Board of Directors at least annually on the implementation of this policy, results of investigations of any violations and identifying and assessing corruption risk to Starboard.

The Senior Vice President, Human Resources and the Senior Vice President Operations of Starboard shall be responsible for implementing and communicating this policy, including:

1. Arranging for compliance training and ensuring employees’ awareness of this policy on a periodic basis;

Information concerning this policy or violations of this policy and suggestions for improving Starboard’s anti-bribery practices should be reported to Senior Vice President of Finance or alternatively may be reported anonymously to the Starboard Hotline 1-800-241-5689.

Starboard will require its agents, contractors, vendors, and other business parties to confirm that they will not pay any bribes or do anything for and on behalf of Starboard that is prohibited by this policy.

Any breach of that commitment will be grounds for immediate termination of the business relationship, without prejudice to any other right of Starboard.

This policy was adopted by Starboard Cruise Services, Inc. on August 22, 2011 and is effective as of that date.

To ensure compliance, all Starboard employees are required to:

1. Read the “Anti-Bribery” Policy
2. Review the “Anti-Bribery” compliance training located in Starport
3. Submit Training Attendance Sheet to cruise line Human Resources Partner

SEE APPENDIX

Ocean Pay

On November 20, 2012 Starboard Cruise Services, Inc. transitioned from a cash payroll system to a personalized pre-paid Visa debit card that provides a faster, easier and safer way to pay all employees and managers. Instead of being paid in cash, Starboard's employees will now have their salaries (wages), commissions and spiffs loaded directly on a Visa debit card on a bi-weekly basis.

- All employees are required to enroll their Visa pre-paid debit card online www.oceanpay.com or by telephone by dialing 1-800-383-7059
- The Ocean pay card has standard fees which are listed in the employee's enrollment packet or online.
- It is the employee's responsibility to keep their Ocean Pay card in a safe and secure location.
- Employees should not share their personalized PIN (personal identification number) with anyone.
- Wage Statement-The information contained within the document is for informational purposes only and should not be used for any legal or tax purposes.

See Appendix: How to Enroll Guide

Discrepancies or Issues with Wages and Ocean Pay Card

All inquiries related to discrepancy of payroll payments (wages) are to be communicated directly to Shipboard Management and Gift Shop Manager. The employee is required to send an email with a cc to the District Manager, HR Manager/Specialist directly to Oceanpay@starboardcruise.com . All inquiries will be researched within fifteen (15) days from the date of the original email communication.

If an employee has any other discrepancy with the utilization of their Ocean Pay card, it is their responsibility to contact Ocean Pay directly by calling 1-800-383-7059 or by internet www.oceanpay.com.

Uniforms

Starboard Cruise Services, Inc. maintains a high standard for Managers and employees to represent Starboard Cruise Services, Inc. as it relates to their personal appearance and hygiene. The uniform policy enhances the overall guest experience and ensures every associate is providing World Class Service. It is the employee's responsibility to present a well-groomed appearance at all times.

Starboard Cruise Services, Inc. will provide all new-hire associates with a uniform (a one-time uniform fee of \$100.00 will be charged to the associate upon embarkation). Every employee is issued a jacket, two blouses or shirts, and two skirts or pairs of pants (unless otherwise specified) and a tie to be worn with the uniform.

Any additional items required will need to be paid for by the employee, and ordered from Human Resources using the Uniform Requisition Form.

SEE APPENDIX

The Gift Shop Sales Manager is responsible to complete the following:

- Enter the amount owed by the employee into the Voyage Work Book on the "Expense" page as a negative figure for the individual.
- Note the date on the Requisition Form that the monies were paid.

Associates are responsible for the following:

- Uniforms are to be kept neat, clean and tidy at all times. Every employee is responsible for their own uniform. Unless an employee does not intend to return for a future contract, each employee must take their uniform with them when they go on vacation, so that they have it for their next contract.
- Name tags are to be clearly visible on the upper left side of the uniform at all times in guest areas.

Sea day Uniform

9am to 5pm

- Sales Associates – Starboard issued uniform pants or skirt and black closed toe shoes with rubber soles.
- Jewelry Specialists – White Shirt and Starboard issued tie, Starboard issued uniform pants or skirt and black closed toes shoes
- Management – Business attire, men to wear a tie.

Evening Uniform

5pm to 11.30pm – non formal

- Sales Associates – White Shirt and Starboard issued tie or scarf, Starboard issued uniform pants or skirt and black closed- toe shoes.
- Jewelry Specialists – White Shirt and Starboard issued tie, Starboard issued uniform pants or skirt and black closed- toes shoes.
- Management – Business attire, men to wear a tie, jackets must be worn in guest area.

Evening Uniform

5pm to 11.30pm – formal

- Sales Associates – White Shirt and Starboard issued tie or scarf, Starboard issued uniform pants or skirt and black closed- toe shoes. Jackets must be worn in guest area.
- Jewelry Specialists – White Shirt and Starboard issued tie or scarf Starboard issued uniform pants or skirt and black closed- toe shoes. Jackets must be worn in guest area.
- Management – Business attire, men to wear a tie and jacket. Women to wear a dress, skirt or pant suit.

Replacement of Uniforms

In the event an employee requires a "new for old" replacement uniform he/she must obtain the approval from Human Resources within 60 days before embarking (with the exception to ties and scarves).

Replacements are permitted only when:

- The condition of the item detracts from the standards prevailing on board for appearance, comfort, functional suitability and safety.
- The original uniform has been lost, stolen or damaged beyond repair.
- Replacements will be charged to the employee if the damage or loss is due to their negligence or abuse

It is the responsibility for all employees to partner with their Gift Shop Manager on any inquiries concerning the Uniform Policy. Starboard Cruise Services, Inc. requires all employees to adhere with cruise line policies if there is a difference as outlined by Starboard Cruise Services, Inc.

Appearance of Employees

MALE	FEMALE
<p>Eye Wear</p> <ul style="list-style-type: none"> • Neutral Colored frames for eyeglasses and sunglasses. • Sunglasses must allow your eyes to be seen. • Natural eye-color contacts <p>Hairstyling</p> <ul style="list-style-type: none"> • Hair must be neatly cut on the back and sides, forming a smooth, symmetrical appearance so that it does not extend beyond or cover any part of the ears or the shirt collar. • A modified “fade” cut is permitted • Hair coloring must look natural. <p>Jewelry</p> <ul style="list-style-type: none"> • One ring per hand and a conservative, business-style watch are permitted. • One necklace with a maximum width of 1mm allowed • Jewelry may not be worn in any visible body piercings. • Wrist and ankle bracelets not allowed. <p>Facial Hair & Sideburns</p> <ul style="list-style-type: none"> • Mustaches are permitted, but must be neatly kept and trimmed and should not extend onto or over the upper lip or beyond or below the corners. Mustaches must be fully grown-in on the employee’s start date. Aside from mustaches, employees must be clean shaven every day. Beards or goatee are not allowed. Side burns should be neatly trimmed, straight and of even width and may be permitted to extend to the bottom of the earlobe. Flared or extremely wide sideburns are not permitted. <p>Shoes</p> <ul style="list-style-type: none"> • Men are required to provide their own black or white (only) leather oxford shoes with a plain toe. In some areas, a leather athletic shoe is required (preferably at deck sales). <p>Tattoos</p> <ul style="list-style-type: none"> • Tattoos may not be visible in guest areas (they should be covered by clothing, make-up or band aids). • Body piercing, tongue studs and visible dental ornamentation are unacceptable. 	<p>Eye Wear</p> <ul style="list-style-type: none"> • Neutral Colored frames for eyeglasses and sunglasses. • Sunglasses must allow your eyes to be seen. • Natural eye-color contacts <p>Fingernails</p> <ul style="list-style-type: none"> • Fingernails should be kept clean. Polish should complement your skin tone; including deeper, richer shades (Florescent colors are prohibited). <p>Hairstyling</p> <ul style="list-style-type: none"> • Hair should be kept neatly combed and arrange in a classic, easy-to-maintain style. • Hairstyles must be symmetrical in appearance and balanced proportionately. • Hair below shoulders length should be confined with a band or hair clip. • Hair coloring must look natural. • Conservative braided hairstyles without beads or ornamentation are permitted provided that they are cut above the ears and collar and are neatly braided. <p>Hair Accessories</p> <ul style="list-style-type: none"> • A plain barrette, comb, or clip no larger than one inch wide and four inches long is acceptable. • All accessories must be a neutral or solid color that matches the uniform. <p>Makeup</p> <ul style="list-style-type: none"> • All facial cosmetics should be blended and in colors complementary to your skin tone. <p>Jewelry</p> <ul style="list-style-type: none"> • One ring on each hand is permitted, with the exception of a wedding set. • One necklace with a maximum width of 1mm allowed. • A conservative pair of earrings and a classic business-style wristwatch are permitted. • Earrings no larger than 2 cm are also permitted. • Jewelry may not be worn in any visible body piercing, except one per ear lobe. • Wrist and ankle bracelets not allowed. <p>Shoes & Hosiery</p> <ul style="list-style-type: none"> • Women in costume or uniform, unless otherwise advised, are required to provide their own black leather pump-style shoes with a plain toe. Flats are acceptable but platform shoes are not permitted. In some areas a leather athletic shoe is required (black or white). <p>Tattoos</p> <ul style="list-style-type: none"> • Tattoos may not be visible while working (they should be covered by clothing, make-up or band aids). • Body piercing, tongue studs and visible dental ornamentation are unacceptable.

Travel Expense

New Hires

New hires will be responsible for travel expenses to their first vessel. Starboard will provide an airline ticket home.

Returning Staff

- Airline expense to and from the designated vessel will be paid by Starboard for returning staff who commence a new term of employment within 3 months of prior contract completion.
- Returning Staff is defined as those that start a new contract within 2 months of completing a six-month contract, this means any employee who has worked 6 months on, and a maximum of two months off. A 3rd month off requires HR approval in advance; 4 or months off results in a loss of seniority. Staff returning after more than a 3 month break, will be classified as a New Hire.

Repatriation

Repatriation will be arranged on the day of disembarkation with a scheduled flight to the airport in the employee's country or repatriation which is nearest to his or her city or town of residence.

MEDICAL POLICY

Medical insurance is provided for all employees while they are signed on the vessel. Medical insurance is not valid when employees sign off the vessel. Once an employee signs off for vacation or work break, the applicable insurance is no longer valid. Employees who are in-transit while transferring from one vessel to another are covered.

If an employee becomes ill or is injured, he/she must immediately report the incident to his/her Gift Shop Manager. The Gift Shop Manager will provide a medical referral slip and send the employee to the Ship's medical department.

The onboard medical department will evaluate the issue/concern. If the medical concern is minor and can be treated onboard, such as: a cold, headache, flu, etc. employee will be treated by the medical team onboard. If the medical concern requires additional treatment by a Specialist, employees will be referred for treatment by the company's Benefits Administrator or the ship's medical department.

- It is the Gift Shop Managers responsibility to complete the Incident Report for all cases prior to any crewmember receiving shore side treatment. The completed report is to be emailed to the following: jennifer.colina@starboardcruise.com, robert.alderman@starboardcruise.com and allison_kelly@usmaritime.com.
- Failure to report an employee incident will result in disciplinary actions up to and including termination.
- Starboard Cruise Services / US Maritime (third-party administrator) will send a Medical Authorization Letter and Work Status Report to give to the employee to be presented to shore side medical facility/doctor.
- If shore side treatment is determined to be an EMERGENCY, then ship's doctor will provide authorization.
- In order to protect the health and wellbeing of the employee and unborn child, Starboard Cruise Services reserve the right to repatriate the employee at the first home port after pregnancy is confirmed.

Medical insurance does not cover:

- Injury incurred otherwise than in the service of the ship
- Injury or sickness due to the willful misconduct or violation the Starboard Cruise Services, Inc. Rules and Regulations of the sick, injured or deceased employee
- Routine eye exams, eyeglasses or examinations, unless they are work-injury related
- Dental work, except extractions and illness or accident related cases
- Pregnancy
- Sexually Transmitted Diseases, (STDs)
- Treatment for pre-existing conditions
- Sickness or infirmity intentionally concealed when the engagement is entered into.

See Appendix for Instructions for Completion of Accident Report

ALCOHOL & DRUG POLICY

It is the responsibility of every employee including Management to adhere to the cruise line Alcohol and Drug Policy. Failing to comply with the cruise line policy will result in immediate termination from the cruise line and Starboard Cruise Services, Inc.

- No drinking of alcoholic beverages will be allowed while on duty and no employee will be allowed to report for work under the influence of alcohol.
- Possession and or use of drugs in any form are prohibited. Violators will be subject to prosecution by local authorities.

Starboard Cruise Services, Inc. will not legally represent any associate or manager found to be in violation of the cruise line Alcohol & Drug Policy.

RANDOM DRUG TESTING

Starboard Cruise Services, Inc. will require all Employees and Managers to comply with any random Alcohol & Drug testing requested by the cruise line. Failure to comply with random drug testing will result in immediate termination with Starboard Cruise Services, Inc.

Performance Management

Starboard Cruise Services, Inc. financially rewards employees for their contribution based on performance. On April 1st, 2011 an annual increase structure was replaced with a company-wide pay for performance structured payout tied directly to the end of contract performance evaluation rating. All eligible shipboard staff will receive a merit increase at the beginning of each contract.

Starboard Cruise Service Gift Shop Managers are responsible for evaluating all employees (Sales Assistant, Assistant Manager, and Lux Managers) twice in a 6-month period.

Every employee should receive a 60-day evaluation and a Signoff evaluation.

The Gift Shop Manager must complete and deliver a sign-off evaluation for any staff member disembarking a vessel for any reason. All evaluations are to be submitted to Workforce Planning (shipboard.evaluations@starboardcruise.com). Evaluations must have the following information before submission to the Home Office.

- The signature of the evaluator
- The signature of the employee
- The date of the evaluation

Sign-off merit increases will only impact the employee's base salary. The current commission structure will not be affected in any way.

In order for an employee to be eligible for a merit increase, they must be onboard for at least 150 days. If an employee signs off a ship after 150 days they will be eligible for a merit increase at the start of the next employment agreement period. The Gift Shop Manager is responsible for completing a performance evaluation which will determine the employee's salary at the beginning of their next contract.

Employees promoted during an employment agreement period will receive a promotional increase and are eligible for a merit increase once they complete a full employment agreement period in their new position.

When the Gift Shop Manager signs off a vessel for any reason, they must complete Sign-off and 60-day evaluations scheduled within 4 weeks of the Manager's sign off. This provides transitional information for the embarking Gift Shop Manager.

The merit increase plan will be structured as follows:

Shipboard Merit Increase			
Performance Rating	% Increase to Base Pay		
	Employee	ASM	GSM
5	6.0%	4.5%	4.0%
4	4.5%	3.5%	3.0%
3	3.0%	2.25%	2.25%

If an employee receives a 2- rating at their End of Contract, they will not be eligible for a merit increase for the current contract. In addition, the company has the liberty to determine if the employee will receive future employment agreements due to poor performance.

Merit increases will be prorated based on actual time of service. All prorated increases are based on a 6- month employment period and administered according to the table listed in the appendix.

See Appendix- Job Descriptions, Evaluation Form, Merit Increase Q&A

Promotion

As a company, Starboard Cruise Services, Inc. looks for energetic, customer service-oriented, and results-driven individuals with accomplished retail experience who are ready to embark on a six-month commitment and experience an exciting career onboard a cruise ship.

In order for an employee to be identified as a candidate for promotion, the Gift Shop Manager must first identify the employee as a High Performing- High Potential employee through the monthly Talent Assessment process which is submitted and reviewed by the District Manager and Human Resources.

Once an employee is identified as a High Performing- High Potential, there is a process in which the employee must complete before he/she will be promoted.

IDENTIFICATION

- Informal Interview
- Monthly Talent Assessment
- Career Conversation / Qualification
- Identification on the GAP and Navision

DEVELOPMENT

- Development Calendar
- Leadership Conference Calls
- Internal Management Training/ Weekly Assessment
- Evaluations
- Cruise line Leadership Training (per individual needs)

VALIDATION

- Ship Visit/ Validation call
- Self-Evaluation
- DM presents for approval
- Promotion

The final decision on any shipboard Management (GSM, ASM, and Lux Salon) will be made by the Home Office (Director of Operations, District Manager, and Human Resources).

*****Going through the HIPO identification, development, and validation process including the ASM training does not guarantee a candidate will be promoted*****

Position & Salary Change

POSITION CHANGE

Any position change must be completed on the Assignment Change form by the Gift Shop Manager with a signature. All forms should be sent to the appropriate cruise line scheduler for processing.

SPECIALIST CERTIFICATION

As of August 2013, Starboard Cruise Serves, Inc. has four specialist certifications:

- Promotional Ambassador
- Fine Jewelry
- Fine Watch
- Beauty

In order for an employee to receive certification, he/she must complete the appropriate training and the Gift Shop Manager must validate their readiness for certification. Once the Gift Shop Manager has validated the employee's readiness, he/she must complete the certification form and submit to the appropriate cruise line scheduler for processing.

SALARY CHANGE

All salary changes should be sent to the Workforce Planning Manager by the assigned Human Resources Manager. It is mandatory that all salary changes must have approval signatures from the Director of Operations, District Manager, and Human Resources.

SEE APPENDIX: POSITION & SALARY CHANGE FORM AND SPECIALIST CERTIFICATION

LEAVE OF ABSENCE POLICY

A leave of absence is an approved absence from work for a specified period of time for medical, personal, or family emergency reasons. Emergency reasons include a death of an immediate family member (parent, sibling, spouse, and children) care needed for the employee's spouse, child, parent, who has a serious health condition, or a personal serious medical condition (all leaves of absence are unpaid).

There are various reasons that require employees to take leave from work to attend to medical, personal or family matters. This policy establishes guidelines for the approval of and return from approved leave of absences.

REQUIREMENTS

- If an employee finds that he/she must be out of work, the Shipboard Sales Manager should contact the Human Resources department to determine if a leave of absence may be necessary.
- The maximum amount of time an employee may be approved to take a leave is 12 weeks in any rolling 12 month period. No more than one leave in a 12 month duration should be approved. Any exceptions for a leave beyond the 12 weeks maximum will need approval by the Director of Human Resources.
- The leave will start on the date of request or date of need. While on a leave, an employee must maintain regular contact with the Human Resources department, as defined in the approved request for leave of absence. Failure to return to work upon the expiration of a leave of absence, or refusing an offer of reinstatement, for which the employee is qualified, will result in voluntary termination.

DOCUMENTATION

- All requests for a LOA must be made on a "Request for Leave of Absence" form and submitted by the Shipboard Sales Manager to the District Manager and Human Resources for approval. An employee should provide a 7 days advance notice when the need for the leave or absence is "foreseeable". If an unforeseeable absence is required, or it is not possible for the employee to provide a 7 days advance notice, the employee must provide a written notice on the date they are informed they may need to disembark.
- Physician certifications supporting the need for a LOA are required within 7 days of the date of request or as soon as practicable for all medical leaves. For an extension of a medical leave of absence, a Work Status Report shall be required. A Work Status Report may also be required in other circumstances. "Work Status Report" forms must be obtained from a doctor and submitted to Human Resources.

APPROVAL

- Both the District Manager and Human Resources Representative will review the request, and Human Resources will provide notice on the approval or decline of the leave request.
- A leave of absence will not be granted to allow an employee time off to seek employment elsewhere or to work for another employer. Employees, who begin employment elsewhere while on Leave, are considered to have resigned voluntarily.

REINSTATEMENT

- Unless otherwise noted, an employee returning from a leave will be reinstated to the same position held at the time the leave began or to an equivalent position, if available.
- The Company, at its discretion, may choose not to reinstate an employee returning from a leave of absence for any reason.

MEDICAL LEAVE

A Medical Leave is defined by:

- Death of a spouse, child, or parent for which you are needed to provide care
- A serious health condition that makes you unable to perform the essential functions of the job
- A serious health condition affecting your spouse, child, or parent which you are needed to provide care.

PERSONAL LEAVE

A Personal Leave is defined by:

- A voluntary leave from employment initiated at the request of the individual employee. A request for personal leave is reviewed individually and granted at the discretion of Starboard. The decision to grant a personal leave will be based on the business needs of the Company and the validity of the request.

EMERGENCY LEAVES BEFORE THE END OF CONTRACT

- All emergency sign off requests must be submitted in writing by the associate to their Sales Manager within a reasonable timeframe.
- All emergency sign off requests are reviewed by the reporting HR Manager/Specialist and District Manager, based on facts presented. Supporting documentation must be included with the request.
- In the event that supporting documentation does not justify a reason for emergency leave, the request will be considered a resignation of employment.

RESIGNATION AND TERMINATION

RESIGNATION

Starboard Cruise Services, Inc. prides itself in creating a mutually rewarding experience on board; we understand that varying circumstances do cause employees to voluntarily terminate their contract. Should this time come, all employees and managers are to follow the guidelines below regarding notice and disembarkation procedures.

- All managers/employees must provide a minimum of (7) days' notice.
- All resignations must be confirmed in writing. The written notice must include the reason for leaving and the effective date
- If a manager/employee provides less notice than requested, Starboard Cruise Services, Inc. will communicate to the employee if they are ineligible for future contracts depending upon the circumstances regarding the notice given.
- All managers/employees will not be allowed to rescind a resignation, whether given verbally or in writing, once the resignation has been confirmed by Starboard Cruise Services, Inc.
- All managers/employees who resign in good standing under this policy and whose documented performance rating is a 3 or higher may be eligible for future contracts.
- All managers/employees who fail to return any company property, including keys, credit cards, tools, uniforms, cellular phones, laptops and other equipment, will be deemed ineligible for rehire and may be subject to legal proceedings on behalf of Starboard Cruise Services, Inc.
- Disembarking managers/employees will be asked to confirm their mailing address, email, and telephone number in the event Starboard Cruise Services, Inc. will need to notify them in the future.
- Final payroll payments will be made on the individual's Ocean Pay Card via the ship's end of Voyage Workbook. The manager/employee will be paid according the company's payroll calendar.

TERMINATION

Involuntary terminations will occur based on violation of company policies. All managers/employees will be warned and counseled based on our progressive discipline process. However, failure to correct behavior or further violation of company policy may result in additional disciplinary action, up to and including termination. Depending on the nature of the offense, the Company reserves the right to terminate any employee without warning. Starboard Cruise Services, Inc. will generally terminate an employee after the third offense.

- Warnings and counseling are to be documented on the company's Corrective Action Form and documented in the employee's' TED file report.
- The company will inform the employee of the reason for termination as well as the date of separation.

RETURNING STAFF/RETENTION

Returning staff are defined as those that start a new contract within two months of completing a six-month contract (continuous six month contract onboard and a maximum of two months off).

- Former managers/employees who apply for re-employment within 3 months of prior contract completion are eligible for future contracts based on the following criteria:
 1. Performance Rating of 3-rating or higher
 2. Zero Disciplinary Action taken within the last 6 months
 3. Approval from District Manager and HR Manager/Specialist
- Any manager/employee that has not been assigned a contract beyond 4 months may not be eligible for seniority with the company and will be classified as a New Hire.
- Any exception to the above policy is under the discretion of Starboard Cruise Services, Inc.

Discrimination & Harassment

Harassment or discriminatory conduct can be any verbal or physical conduct that belittles or otherwise shows hostility or aversion toward an individual or group based upon that individual's or group's race, color, religion, gender, national origin, marital status, age, citizenship, disability, and sexual orientation that for a reasonable person:

- has the effect of creating an intimidating, hostile, or offensive work environment; or
- has the effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's terms and conditions of employment.

Examples of illegal harassment include, but are not limited to, insults, slurs, jokes, negative stereotyping, or other acts which are threatening, intimidating, or hostile in nature, that relate to a protected class, or any display of written or graphic material such as photographs or cartoons that belittles or shows hostility or aversion toward an individual or group because of the same.

- Any employee who believes that he or she is being or has been illegally discriminated or retaliated against or harassed must notify a member of management (Gift Shop Manager, District Manager, HR Manager/Specialist, Director or specifically-designated senior-level Human Resources).

- Departmental managers and supervisors are responsible for bringing any allegations or concerns related to potential cases of illegal discrimination or harassment to the immediate attention of the Home Office Management (District Manager and Human Resources Manager/Specialist).
- Employees questioned during the course of an investigation are obligated to cooperate in a full and honest manner. No employee shall face any form of retaliation for making a complaint or for his or her cooperation with an internal investigation. Employees who either refuse to cooperate in an internal investigation, or who intentionally give false information at any point within an investigation, shall be subject to disciplinary action.

Sexual Harassment

Starboard Cruise Services, Inc. has a zero tolerance policy and prohibits sexual harassment in the workplace. All employees are expected to be sensitive to and respectful of their co-workers and others with whom they come into contact. Unwelcome sexual advances, requests for sexual favors or other verbal, physical, or visual conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made a condition of an individual's employment.
- Submission or rejection of such conduct is used as a basis for making promotion or certification decisions affecting the individual.
- Such conduct, intentionally or unintentionally, unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

The consequences for violation of this policy will depend on the severity of the incident. Disciplinary action can range from (but is not limited to) verbal warnings to termination.

Examples of Offensive Behavior

Verbal

Examples of verbal behavior which can be offensive, unwelcome and/or uninvited include (but are not limited to):

- using a derogatory name to refer to anyone;
- whistling at someone, cat calls;
- making sexual comments about a person's body;
- telling sexual jokes or stories;
- asking about sexual fantasies, preferences, or histories;
- making sexual comments about a person's clothing, anatomy, or looks;
- repeatedly asking out a person who is not interested;

- making kissing sounds, howling, or smacking lips; or
- telling lies or spreading rumors about a person's sex life.

Visual or Non-Verbal

Examples of visual or non-verbal behavior which can be offensive, unwelcome and/or uninvited include (but are not limited to):

- looking a person up and down;
- staring at someone;
- blocking a person's path;
- following a person;
- giving personal gifts;
- displaying sexually suggestive photos;
- making facial expressions such as winking, throwing kisses, or licking lips; or
- making sexual gestures with hands or through body movements.

Physical

Examples of physical behavior which can be offensive, unwelcome and/or uninvited include (but are not limited to):

- giving a massage around the neck or shoulders;
- touching the person's clothing, hair or body;
- hanging around a person;
- inappropriate hugging, kissing, patting or stroking;
- inappropriate touching or rubbing oneself sexually around another person; or
- standing close or brushing up against a person.

Sexual Harassment-Continued

Who to Contact With a Complaint

First, recipients of harassment should notify the harasser that their behavior is unwelcome and should stop immediately.

If the sexual harassment continues, then the individual should notify their Gift Shop Manager or Assistant Manager. However, if the complainant is uncomfortable notifying their Gift Shop Manager or Assistant Manager, they should contact one of the following:

- Human Resources Manager/Specialist
- District Manager

Once the Home Office is notified the complaint is forwarded to the Manager of Human Resources who coordinates all follow up procedures.

Contact should be made in the order indicated. However, if an individual is uncomfortable following this order, or if the complaint is concerning one of the Ship's Staff, contact may be made directly with the Director of Human Resources.

Gift Shop Managers and employees are required to immediately notify the Home Office of any complaints or reports of problems they receive. The District Manager and Human Resource Specialist are required to immediately notify the Human Resource Manager and the Director of Human Resources. The Human Resources Manager either on his/her own initiative or at the direction of the Director of Human Resources, or the Vice President of Human Resources will initiate and direct an investigation of the complaint.

Fraternization

Fraternization between Shipboard Management (and those acting in a supervisory capacity) and the employees they supervise is discouraged. It is the policy of the Company that personal relationships between company employees should not unfavorably impact the effectiveness of company operations.

DEFINITION

Fraternization includes dating, cohabitation (living together) or in any way being involved in a manner generally referred to as a “close personal relationship.”

GUIDELINES

“Acting in a supervisory capacity” includes, but is not limited to, anyone who has the authority to:

- Make decisions regarding the employees status in the Company
- Conduct performance reviews
- Create work schedules, approve working hours or authorize any other time off
- Control either directly or indirectly, work activities of an employee or group of employees

DECLARATION

If anyone in a Shipboard Management position (or those acting in a supervisory capacity) engages in a “close personal relationship” with an employee that they supervise, they must advise their District Manager and Human Resources Manager.

Disciplinary Actions

The decision to take disciplinary action, if any, shall be based upon the findings of an investigation, repetitive pattern of behavior, or company violations that qualify for immediate termination of an employment agreement. Disciplinary action is to be appropriate to the nature of the situation and can range from, but is not limited to, verbal warnings, corrective actions, demotion, and/or termination of employment agreement.

Disciplinary action will be decided upon by the Director, District Manager, Human Resources, and/or Gift Shop Manager.

If an employee receives more than three disciplinary actions within one employee agreement, a review for immediate dismissal will be conducted by the Director of Human Resources.

See Appendix-

- Corrective Action
- Company Violations that qualify for immediate termination of employment agreement

Grievance Procedures

All embarking managers and employees will receive a copy of the Cruise Line grievance policy. Every Manager/Employee has the right to file a complaint of wage (See Ocean Pay Policy) or non-wage nature and to have that complaint investigated, provided it is specific in nature and is alleged to constitute a breach of seafarers' rights under the Maritime Labor Convention 2006, or applicable internal procedures.

Starboard Cruise Services, Inc. recommends that employees adhere to their assigned cruise line Grievance Policy in the event there is disparity.

SHIPBOARD

All Managers/Employees "seafarer" with a complaint or concern has the right to address their concerns by bringing it to the attention of the proper authority on board and/or the Home Office, listed below.

- Gift Shop Manager
- Home Office Management (Operations/HR Director, District Manager, HR Manager/HR Specialist)
- Shipboard HR Manager/Director (where available)
- Master

In all cases, seafarers have the right to complain directly to the Master, the ship owner and competent authorities, where they consider it necessary. As well, Starboard Management and employees have the right to file a complaint with Starboard Cruise Services, Inc. for conciliation with all complaints related to ship staff.

- All Managers/Employee "seafarer" have the right to be accompanied and to be represented by another employee "seafarer" of his/her choice, on board the ship.
- All complaints by Managers/Employees should be communicated and resolved at the lowest level possible; and only when the matter cannot be resolved to the satisfaction of both parties, should it be elevated to the next level.
- Management is to respond to the complainant within fifteen (15) days from the date of the alleged occurrence of the grievance and bring the matter to the ship's Master, Shipboard Department Head, Gift Shop Manager, Shipboard HR Manager/ Director, and Home Office Management, who each in the chain of command dealing with the grievance shall have a further seven (7) days to bring about a solution to the matter through conciliation, provided that this time limit is appropriate to the seriousness of the matter.
- If the Master cannot reconcile the complaint, the matter should be formally referred to the Company Headquarter and /or Starboard Cruise Services, Inc. in the person of Director HR Shipboard Operations, within 7 days thereafter, who must conciliate the matter in accordance with the terms and conditions of employment.

- If a matter is to the prejudice of the Master, then a Manager/Employee may present his/her case directly to the Company or Starboard Cruise Services, Inc. in the person of the Director HR Shipboard Operations or his/her appointee.
- Until such time as the Company's decision is received, the Master's decision shall be binding on all parties.

External Authorities

Seafarers shall have the right to file a complaint directly to an appropriate external authority, such as, but not limited to:

- a Flag Administration
- a Flag Administration Inspector
- a Port State control official

Should a complaint reach the level of external authorities, other than Flag, that authority shall be provided with the contact information for the Maritime Administration and shall be requested to communicate the complaint to them.

The Maritime Administration shall communicate the complaint to the Company who shall then be expected to resolve the matter in accordance with the terms and conditions of employment to the satisfaction of both parties.

It is the Gift Shop Management team's responsibility to ensure a written report has been completed on board and sent to the Company.

The report shall list the details of the complaint, the action taken and the decisions agreed.

A copy of the report will be given also to the Seafarer involved. Appropriate entries in the ship's official log book must also be made.

Any victimization (retaliation) against a seafarer for filing a complaint is strictly prohibited. Victimization (retaliation) is understood to mean any adverse action taken or threatened by any person with respect to a seafarer for lodging a complaint which is not vexatious or maliciously made.

HOME OFFICE

- Upon receipt of a complaint/problem from the ship's Master/Company Headquarter, the Director of Human Resources or Director of Operations will advise the HR Manager/Specialist and District Manager regarding what procedures to follow for investigating and documenting the situation. The District Manager and Human Resources Manager/ Specialist will oversee the investigation, unless the complaint is against them, in which case the investigation will be carried out by persons designated by the Senior Vice-President, Human Resources.
- Care shall be taken to immediately investigate and document the situation within fifteen (15) days by reviewing shipboard documentation and/or interviewing involved managers/employees.
- The progress of the investigation will be monitored by the Human Resources Manager/Specialist and the Director of Human Resources.
- A determination as to the validity of the complaint and any action to be taken as a result will be made and recorded with a copy provided to the seafarer concerned.

Starboard Home Office Address: 8400 NW 36th Street, Suite 600 Miami, FL 33166

Ethics and Compliance Hotline: 1-800-241-5689 (US) or 00 1-800-241-5689 (international)

APPEAL

- If a Manager/Employee does not agree with the decision determined onboard, they may write to the Director of Human Resources within ten (10) business days of the date of the decision exercising their right of appeal.
- When the appeal involves other individuals, the persons named in the grievance will be informed of the appeal and the outcome.
- The decision may be given verbally or confirmed in writing within ten (10) business days of the hearing. Any recommendations for further action will be clearly stated in the letter.
- The decision following the appeal is final and there will be no further internal right of appeal.

RECORD KEEPING

- Any record pertaining to filed grievance issues of wage or non-wage nature must be retained by shore side office for a minimum of 7 years.

Confidentiality

All parties are required to maintain strict confidentiality and shall not discuss the matter, or the persons involved, with any unauthorized personnel or personnel not directly relevant to the resolution of the situation.

General Implementing Procedure

1. Any employee who believes he or she has been the subject of sexual harassment should report the alleged act immediately to their supervisor or the company's Human Resources Department.
2. The Human Resources Department and the District Manager will make an immediate and confidential investigation of all circumstances.
3. The guiding standard is that all employees have the right to work in a discrimination-free environment, which includes freedom from sexual harassment by Starboard Cruise Services, Inc. personnel or third parties.
4. Any supervisor or employee of Starboard Cruise Services, Inc. who is found to have engaged in sexual harassment, in violation of the law and company policy, under the guidelines set forth above, will be subject to appropriate disciplinary action up to and including immediate termination of their employee agreement.

Retaliatory Actions

Retaliation, of any kind, for reporting instances of sexual harassment is prohibited. Persons found to be retaliating in any way are subject to appropriate disciplinary action, ranging from, but not limited to, verbal warnings to termination.

Vacation Pay

The employee shall be eligible for vacation pay calculated at the following rate:

The number of days of service under this agreement / 30 X current monthly salary/ 30 x 2.5

Objective:

Starboard recognizes that paid time off contributes toward the health and effectiveness of employees. To promote employee well-being and in compliance with MLC regulations, this policy represents the Company's approach to vacation pay for our employees.

Vacation Pay Overview

- Vacation pay is payable to all shipboard Gift Shop Sales Managers, Assistant Managers, and employees.
- Vacation pay is calculated and paid directly by the Home Office. The Gift Shop Manager will not be required to make any changes to the workbook.
- Vacation pay will be paid at the rate of **2.5 days for every month (30 days) worked**.
 - Calculations for vacation pay will commence on August 20, 2013, meaning vacation pay will only begin to accrue following this date
 - Employee's monthly salary will be used to calculate daily rate of pay
- Payments will be made to the employee's Ocean Pay card on the next pay date following their sign off date

APPENDIX- Please refer to the Knowledge Center via Starport

POLICY	ADDITIONAL RESOURCE (\$)
Social Media	
MLC 2006 Inspection Checklist	
Anti-Bribery	
Ocean Pay	
Uniforms	
Medical Policy	
Performance Management	
Position and Salary Changes	
Disciplinary Actions	
Leave of Absence	
Grievance Policy Competent Authorities	

