

September 06, 2011

STARBOARD CRUISE SERVICES ANTI-BRIBERY STATEMENT

To whom it may concern,

As you are may be aware, Starboard Cruise Services, Inc. is the world's leading onboard retailer, offering cruise ship passengers world-class brands and exclusive merchandise with tax and duty free savings. Together with our cruise partners, our goal is to provide an unforgettable, exciting vacation and destination shopping experience. Starboard Cruise Services, Inc formerly Greyhound Leisure Services, has been in operation since 1958.

The U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010 prohibits bribery and other corrupt payments regardless of where such acts occur. Furthermore, the Bribery Act prohibits so-called "facilitating payments" made to government officials to secure or expedite the performance of routine governmental action. These may take the form of small cash payments, cigarettes, alcohol, perfume or other items of nominal value given to government officials for routine actions such as ensuring timely issuance of permits, conduct of inspections or processing of routine paperwork. The Bribery Act's prohibition on facilitating payments has changed worldwide sentiment regarding best practices in company compliance programs. As a company committed to conducting business according to the highest ethical principles and in accordance with best practices, Starboard has a clear policy not to pay bribes or make facilitating payments.

We request and require that third parties who represent our interests – such as agents, contractors, Vendors or other business partners – must comply with this policy and assist Starboard's compliance efforts. In particular, this means that in addition to ensuring the compliance of your own operations, you should immediately inform your employees and the relevant business and government partners with whom you deal on our behalf regarding Starboard's policy as set out in this letter.

We sincerely value our professional partnership with your company, and we hope you understand the importance of this issue. Please contact us if you have any questions, concerns, comments or if any difficulties may arise.

Yours sincerely,



Ares M. Michaelides, CFA
Senior Vice President
Finance and Administration