

STARBOARD HOLDINGS, LTD. LOGISTICS SUPPLIER COMPLIANCE AND ROUTING MANUAL

Starboard Holdings and/or Starboard Cruise Services, collectively called "Starboard" or "Buyer" requests all Supplier shipments be packaged and transported effectively and safely, whether goods are shipped freight Prepaid or Collect to Starboard's Miami Distribution Center or directly to a vessel. This guide summarizes the most important Logistics compliance requirements for each shipment type and provides instructions for transportation from Supplier to Starboard Cruise Services' final destinations. Compliance with these requirements supports our common goal of expediting the flow of merchandise to the selling floor.

Note: The information in this manual may be updated periodically and can change without notice. It is recommended for suppliers to refer to the online version found at http://logistics.starboardcruise.com to ensure the most current information is used.

Suppliers are advised that failure to follow these procedures and adhere to the shipment instructions provided by Starboard Cruise Services' Logistics Department will subject the Supplier to expense offset chargebacks in addition to other direct costs incurred by Starboard Cruise Services because of Supplier non-compliance and may result in the shipment not being picked up timely.

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Understanding the Purchase Order Header

Several combinations of elements will dictate documentation, communication, packaging, and regulatory compliance requirements. Some of the elements for consideration include:

- Shipping Origin and Destination
- Duty Free or Duty Paid Status
- Inco Terms and who is responsible for payment and routing of the goods
- Mode of Transportation
- Shipment Types: Direct Ship Deliveries, Miami Central Stock Orders, or Miami Cross dock shipments Your Purchase Order header helps provide some guidance on Shipment Type and requirements that will apply to your shipments:



The Shipment Type is determined by a combination of 2 PO fields <u>Location Code</u> and <u>Destination Location</u> Below is a quick reference tool to identify the PO Shipment Type for your order:

Shipment Type	Location Code	P Destination Location	
Central Stock	DC	(DC) Starboard Distribution Center	
Cross Dock	DC	Ship Number & Name	
Direct Ship Delivery (DSD)	Ship Number	Ship Number & Name	

Below is an illustration of how each shipment type will appear on the PO Header:

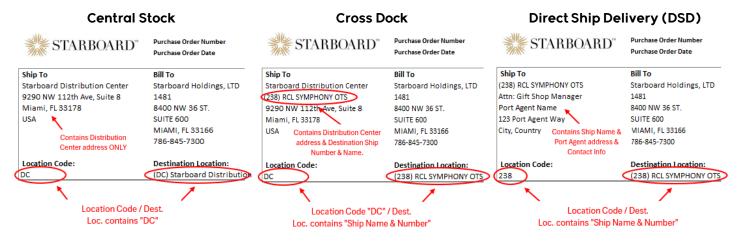




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Glossary of terms and definitions

1. Shipping Window: The time between the First and Last Ship Dates

on the Starboard Purchase Order.

2. First and Last Shipment Dates: The first and last date for the order to ship in order

to meet the "Expected Delivery Date".

3. Business Days: Monday through Friday, Excluding Holidays.

4. Goods Ready Date: First date goods are available for pick-

up or expected to ship.

5. Expected Delivery Date: Date on Board Ship for Direct Ship Deliveries or

date expected at the Miami Warehouse.

6. DSD Order: Direct Ship Deliveries are orders that

sent directly from Supplier location to a ship or designated consolidation point.

7. Cross Dock Order: Cross Dock purchase orders are orders

> shipped to the Starboard Distribution Center, Pre- destined and pre-packed by the Supplier

for a specific destination Ship.

8. Central Stock Order: Central Stock purchase orders are orders to

> be shipped to the Starboard Distribution Center for stock and replenishment to the

ships.

9. Duty Free / Bonded: Import or export shipment which has not

been cleared by customs and is transported,

stored, or

handled with security to the government provided by indemnity

bonds.

10. Incoterms The **Incoterms** or International Commercial Terms are a series

of pre-defined commercial terms published by the International

Chamber of Commerce (ICC) relating to international commercial law. They are widely used in international

commercial transactions or procurement processes and their

use is encouraged by trade councils, courts and international

lawyers.



1. General Guidelines which apply to ALL Starboard Purchase Order Shipments

b. Ship Windows

The measurement tool is an industry standard, Start Ship Date and Stop Ship Date.

This "window" requires a Supplier to have merchandise available to Starboard for Pick-Up or for delivery to the carrier/consolidator anytime within those dates without penalty. If shipment is not made available to the carrier/consolidator before the Last date or is tendered in advance of scheduled First date, an expense offset penalty will be invoked. See Terms and Conditions:

Time of Delivery

c. Merchandise Quality

Damaged, Defective, Expired, or Expiration Date not within Starboard and Supplier Shelf-Life agreement when received.

Starboard shall have the right to inspect the Goods, including any samples thereof, before accepting delivery and/or during the Quality Assurance process in the receiving area. If the Goods are defective,

damaged, expired, or fail to conform in all respects with the Seller's representations and warranties in the Order, have been shipped in variation of the quantities ordered, substituted for Goods ordered, not shipped in standard containers approved by Starboard, or otherwise strictly in accordance with specifications shown on the face of the Order or other agreement between Starboard and Supplier, the Starboard may, at its option:

- i. Return such Goods at the Seller's expense.
- ii. Hold such Goods subject to the Seller's order, expense and risk.
- iii. Cancel the Order and obtain reimbursement for the reduced value of any non-conforming Goods or subtract such amount from any amounts then owing or thereafter owed the Seller or its affiliated persons or entities. No rights or remedies under the Order or otherwise given by applicable law shall be waived by the Buyer's acceptance of the Goods.
- iv. Or impose an expense offset fee to the Supplier.

d. Fill Rate

Fill rate will measure a Supplier's performance against actual items and quantities on the original purchase order that are shipped on time.

Fill Rate will measure a 90% rate at the Purchase Order level. A Supplier penalty will be incurred if goods received fall below 90% of those goods ordered. See Terms and Conditions: Fill Rate of Orders

e. PO Quantities

Any changes in PO Quantities must be communicated and approved by Starboard prior to shipment

f. Required Documentation

Starboard needs accurate paperwork from a Supplier in order to clear customs and receive product. If that paperwork is late, missing, missing required information and/or inaccurate, a Supplier chargeback will be incurred per document. See Documentation Guidelines pg.



g. Substitutions

When an unauthorized substitution is shipped, the shipment is prevented from being booked into the warehouse on timely basis and causes additional paperwork and expense. Thus, a Supplier must ensure PO's are filled with items as ordered by Starboard.

Substituted merchandise is always automatically rejected by Starboard, without the need for notice from Starboard or any other action. Even if Starboard may be deemed, under applicable law, to have "accepted" substituted merchandise, Starboard may reject the substituted merchandise at any time after the deemed acceptance. Starboard shall have no obligation to notify the Supplier of any rejection. Purchase Order Substitutions received are subject to an expense offset fee. See Terms and Conditions: Fill Rate of Orders

h. Multiple Shipments/Backorders

When more than one shipment is made against a purchase order, it increases the overall freight cost and processing costs.

Purchase Orders must be tendered complete to Starboard at the time of pick-up or delivery. An expense offset penalty will be incurred for Multiple Shipments/Backorders. Please do not ship multiple shipments or backorders. See Terms and Conditions: Fill Rate of Orders

i. Shipping Information

As a reminder, goods should be prepared for shipment according to standard commercial practice, packed adequately to ensure safe arrival, and in accordance to Starboard Cruise Services compliance guidelines.

Suppliers shipping Prepaid using their own carrier or truck (where Starboard is not responsible for the freight charges) are still required to follow this Supplier Manual in terms of carton marking and packing, document requirements, routing and shipment notification, etc. Starboard's Logistics Department must receive the Shipping Notification Form showing the carrier to be used along with the necessary documents prior to the shipment. Specific requirements for Collect and Direct Ship Delivery shipments are also detailed in this Supplier Manual. All shipments must be tendered palletized & shrink wrapped on USDA approved pallets, unless otherwise approved by Starboard. See Prepaid Routing and Shipping Supplier Responsibilities pg.

j. Item Marking/Ticketing

Merchandise must be ticketed with the following information, as detailed in the Item Marking Guideline section of the online manual. (Varies by product category)

- UPC barcode and number
- Starboard Item Number and/or Supplier Style Number
- Item Description
- Color and Size, if applicable
- Retail Price

This is a prerequisite for doing business with Starboard. A series of general application and formal requirements for ticketing are outlined in the Item Marking Guidelines section of the online manual. An expense offset penalty will be applied to purchase orders not marked in accordance to per specs set forth in the online manual. See Item Marking Guidelines



2. Starboard Pre-Alert Form (PURF), Required Information, Timelines

a. Starboard Pre-Alert Form (PURF)

Starboard is now utilizing a Universal Starboard Pre-Alert Form (PURF) for ALL Payment Terms.

When properly indicated, the form will reflect the correct Starboard Form title to be utilized. Incorrect combination of payment terms and form type will generate an error message on the header of the form. (See *Table A* below for correct combinations)

The Starboard Pre-Alert Form is located under the **Supplier Manual** section of the **Supplier Compliance Program Site**.

Based on our agreed Payment Terms and Corresponding Inco Terms, the form will prompt you for specific information and communication requirements.

Prepaid Vendors: A prepaid Vendor will be responsible for Carrier Selection, Routing, and Payment for all Logistics services to the agreed place of receipt as stipulated by your Inco Terms (DAT, DAP, or DDU)

Collect Vendors: Starboard will be responsible for Carrier Selection, Routing, and Payment for all Logistics Services from an agreed place of origin as stipulated by your Inco Term (FCA named place of Origin)

Detailed instructions for completing this form are included on the second tab of the Pre-Alert Form, titled Form Instructions.

Table A – Correct payment terms and form combinations.

Payment Terms	Destination	Form Type
Collect Terms		
FCA	Miami	PURF Pick up Request Form to Starboard Distribution Center Freight Terms Collect
(Free Carrier- Named Origin or Consolidator Location)	Direct Ship Delivery	DSDF (Direct Ship Delivery Form) Freight Terms Collect
Prepaid Terms		4
DAT- Deliver to Terminal/Airport DAP - Delivered to Destination Place DDU- Delivered to Destination Duties Paid	Miami	SNF (Shipper Notification Form) Freight Terms Prepaid
	Direct Ship Delivery	DSDF (Direct Ship Delivery Form) Freight Terms- Prepaid

b. Required Information

Once the correct form is selected, the form will show any unique fields that will be required for that form transaction type.

Each pre-alert form must contain only orders from the same shipping location and to the same destination.

Duty Free/Bonded orders must be on a separate pre-alert form than Duty Paid orders, even if shipping from same origin and to same destination.

All Forms, regardless of the shipment origin and destination, will require that the following fields are accurately entered:

• Shipment Origin (Geographical Region)



- **Shipment Destination** (Ship Name for Direct Deliveries or Starboard Distribution Center for Central Stock inventory or Cross Dock goods)
- Shipper Name, Address, and Contact information of where the goods are located (manual entry)
- Port Agent Name and Location as indicated by your PO, or Address to Starboard Distribution Center (Selected from Pull-down list)
- Freight Payment Terms
- Form Type (based on destination)
- Starboard Freight Terms (highlighted based on Payment Terms and Form Type)
- PO Start and Stop Date as indicated on your Starboard Purchase Order
- Ready Date and Time (Date and Time shipment is available for pick-up or will be shipped and
 must fall within the First ship date and Last ship date as indicated on the Purchase Order)
- Mode of Transport
- Purchase Order number(s)
- HTSUS Number (at 6 digit level) US Harmonized Tariff Number
- Commodity Description (selected or manually entered)
- Units (Item Quantity)
- **UOM** (Unit of Measure)
- Quantity of Cartons (Listed by Common size and dimension)
- Weight
- **Dimensions** (in regional measurement units as indicated)
- Number of Pallets
- Pallet Weight
- Pallet Dimensions
- Pallet Type and Quantity Summary
- **Special Regulatory or Shipment Condition** requirements such as Hazardous Material, Bonded, CITES, ATF/TTB, and any special temperature control requirements
- In addition to the general requirements, the following information is required based on form or transaction type:
 - **All Prepaid Shipments**
- Forwarder and Carrier Information
- Trucker's Proforma / Airway/Ocean Bill of Lading Number
- Booking Number (if relevant)
 - Prepaid Inbound Ocean Shipments to Starboard Distribution Center
- International Security Filing Number (ISF)
- c. Instructions for submitting your Pre-Alert Form via email
 - In the Subject Field:
 - Vendor Name, Destination Location (Ship or DC), and PO Number/s
 - In the Body of the E-mail Include:



For Collect Shipments:

o Include total cartons, weight and dimensions per pallet, ready date, hours of operation, and contact information

For Pre-Paid Shipments:

- o ETA of shipment to Port, Airport, or agreed destination
- o Routing Information, including Carrier name, waybill (ocean or air), house waybill (if applicable), Flight Numbers or Tracking Information, etc....

For Duty Free/Bonded Shipments: (regardless of Freight Term)

o Copy/CC: the Starboard Customs Department when sending pre-alert form

Attachments:

- o The Pre-alert Form
- All Supporting Documentation, Commercial Invoices, Packing List, Regulatory Forms, etc.
- o If possible, please submit a photo showing the palletized shipment for routing.

d. Timeline Guidelines

Sending the Pre-Alert Form to Starboard and/or Port Agent

- For Collect Freight Term completed Pre-Alert form must be received by the Starboard Logistics Transportation department and Port Agent (if DSD) 2 to 5, Business Days (Considering US Holidays) prior to the "First Ship Date" indicated on the Purchase order.
- For Prepaid Freight Term completed Shipping Notification form must be received by Starboard Logistics Transportation department and Port (if DSD) 2 to 5 business days (Considering US Holidays) prior to the Shipment departure from origin.

e. Collect Freight Terms, Starboard Routing and Shipping Responsibilities

- Starboard Logistics Transportation Department will validate all information on Pre-alert forms as well as any required supporting documents and notify if any exceptions.
- Starboard will advise of the logistics provider who will be contacting Supplier to confirm arrangements for pick-up.

All questions related to information in Section 8 above, and/or related to the Shipping Forms must be directed to the contact on the corresponding Shipping Form or as follows:

For Pre-Paid Suppliers:

logistics.prepaid@starboardcruise.com For Collect

Suppliers: <u>transportationinbound@starboardcruise.com</u>

For Duty Free/Bonded Shipments: mia starboard cdc@starboardcruise.com

Failure to send the correct form; to send complete and correct information; to provide the form 2 to 5 Business days (Based on US Holidays) in advance of the First Ship Date, for Freight Term Collect orders, and 2 to 5 business days (Based on US Holidays) prior to shipment departure from origin on Freight Term Prepaid orders; to provide required supplemental documentation; or to provide a Ready Date which falls within the shipping window, will result in noncompliance penalties.

Any Discrepancy may result in delayed routing or denied receipt of shipment.



3. Prepaid Freight Terms, Supplier Responsibilities

a. Domestic Shipments:

The carrier must request and obtain a delivery appointment. Deliveries without appointment will
not be accepted and are subject to expense offset compliance fees.
 For Delivery Appointment, submit appointment request to:
 DLLogisticsInbound@starboardcruise.com

b. In-Bond Shipment:

• Shipments from a bonded warehouse, traveling within the United States, or originating from Canada and transporting through the United States, or originating from a Free Trade Zone, must be provided with Customs Form 7512/QP for bonded movement. The 7512/QP must be "arrived" at the Port of Miami (5201) before delivery to Starboard's Distribution Center.

c. International Shipments:

Air and Ocean Shipments to the Starboard Distribution Center (DC)
 Must be made available in Miami, Florida (Miami Airport 5206 or Miami Seaport 5201)

• Ocean Shipments to the Starboard DC

Requires an International Security Filing Number (ISF)
All international ocean shipments arriving into the United States require compliance to
Customs and Border Patrol (CBP) Importer Security Filing (ISF) 10+2 rule. <u>CBP requires</u>
<u>ISF 10+2 filing 24 hrs. prior to cargo loading on vessel at foreign port</u>. If past 24 hours,
the customs ISF is considered late and CBP will have the right to issue fines in the
amount of \$5,000 for each violation, not to exceed \$10,000 per shipment.
Starboard Cruise Services requires Prepaid Suppliers shipping via Ocean to file ISF
Notification on Starboard's behalf. Prior to your first shipment, "Limited Power of
Attorney" will be provided to your Logistics provider in accordance with this requirement. Please
contact Starboard Transportation at

transportationinbound@starboardcruise.com for support.

The ISF 10+2 Confirmation Number must be provided on the Pre-Alert Form to Starboard's transportation department and Transport Document (BOL/AWB) upon shipment. (See the Documentation section for further details.)

• Direct Ship Deliveries (DSD)

Goods to arrive at final destination port no later than 5 Calendar Days prior to the Expected Delivery Date on board the Ship to allow for recovery and clearance.

• Direct Ship Deliveries under payment terms DDP (Delivered Duties Paid)

The Supplier is responsible for coordination and clearance to ship side on the designated provision date. Suppliers should insure all commercial arrangements are made in advance with their designated logistics partners to ensure smooth processing and direct billing requirements.

d. Courier and Small Package Shipments (International or Domestic)

- The Starboard PO number needs to be indicated in the Billing Reference Field of the shipping document
- Duty Free/Bonded purchase orders ensure courier will not clear U.S. Customs
- Shipments via currier (UPS / FedEx) cannot exceed more than loose 10 cartons per PO.



4. <u>Documentation Guidelines</u>

a. General Documentation Guidelines

- The Starboard Purchase Order (PO) Number (Prefixed by DC) must on **ALL** documentation
- Duty Free/Bonded and Duty Paid orders **must not** be on the same Transport Document/Shipment

b. Transport Document (Freight Bill, Bill of Lading/BOL & Air Way Bill/ AWB)

Must be consigned to:

Starboard Cruise Services 9290 NW 112 Ave, Suite 8 Miami. FL 33178

- Must be manifested in the total number of cartons of the shipment (Not Pallets)
- Must provide the accurate Weight and cube of the shipment
- Must state the Freight Payment Terms:
 - -Freight Collect (Starboard pays freight for Terms FCA)
 - -Freight Prepaid (Supplier pays freight for Terms DAT, DDP, DAP)

If Ocean Freight:

- Must indicate container and seal number
- International Security Filing Number (ISF)
- Ocean Bill of Lading should be issued "EXPRESS RELEASE"
 If Applicable to the shipment/item:
- Temperature control requirements
- Hazardous designation
- Any special handling required (e.g. in-bond)
 Below requirement only apply to DSD orders:
- Must include in the body of the BOL or Handling Information:
 - "Ship Stores In-Transit"
- "Notify on Arrival Party" must include Port Agent Name and Phone Number

c. Hazardous Materials

- Hazardous Materials (fragrance, nail polish, relevant cosmetics etc.) as defined by International Air Transport Association (IATA), International Maritime (IMO), or US Title 49 of the Code of Federal Regulations (CFR49), must be properly packaged, labeled, and Documented.
- Must be properly declared on the Transport Document (per applicable regulations)
- Hazardous Material Documents must be provided:
 - Air IATA Hazardous Material Declaration
 - Ocean IMDG Form
 - All Modes Material Safety Data Sheet
- A copy of the Material Safety Data Sheet must also be on file with the Transportation Department and Distribution Center for each product shipped to Starboard

d. Packing List

A Packing List is required for all shipments.

Each Packing List must correspond to <u>only one</u> specific Starboard Purchase Order and Commercial Invoice.

The Packing List must include the following:



- Ship From Address
- Ship To Address
- Starboard Purchase Order number, including prefix, "DC"
- Starboard Item Number (SKU) and/or Supplier Style Number
- Item Description
- Contents by Carton (preferred)
- Quantities Ordered (preferred)
- Quantities Shipped
- Total Units per Packing List / per PO
- Relevant Invoice Number (preferred)
- Breakdown per Size and Color for Apparel and Shoe Orders
- Gross weight (specify unit of measure)
- Number and type of outer packaging
- Total Carton Count for the PO

**Packing list should not include prices

Below requirement only apply to DSD orders:

 Ship to Address: Cruise Line Abbreviation and Ship Name, proceeding the Port Agent Name Example: M/V XCL Dream C/O Port Agent Name and Address

e. Commercial Invoice

The Commercial Invoice is required for all shipments, including those from and within the United States and those traveling in-bond in and out of the United States.

Each Commercial Invoice must correspond to only one Starboard Purchase Order and must show the following in English:

- Supplier Name and Address
- Bill to as per Purchase Order
- Ship to Address
- Terms of Payment & Terms of Delivery
- Mode of Transportation
- Possible discount (cash discount), rebate or allowance
- Manufacturing date, best before date/expiration date (for Food/Candy)
- Shelf life (for Food and Candy)
- Starboard Purchase Order Number, including prefix "DC"
- Quantities shipped, number and type of packages
- Total Items/Units per Invoice
- Complete Description of Merchandise
- Country Of Manufacture for each SKU/Style
- Item Cost in USD
- Extended Cost in USD



- Total Invoice Value in USD
- Supplier Style (including size/color where applicable)

The below additional requirements apply to Duty Free/Bonded orders:

- Manufacturer/Seller Name and address of each SKU/Style and/or "MID"
 Important: If Textiles, must be the Actual Manufacturer not supplier
- HTSUS Number (at 6-digit level), US Harmonized Tariff Number
- Item/Unit Quantity based on the Items HTSUS Number (ex. Jewelry Grams, Alcohol pf/liter)
- Complete, Clear Description of Merchandise (what is it, what is it used for, what is it made of?)
- Breakdown per Material/Fiber Content

f. Partnering Government Agency (PGA) Requirements

In addition to US Customs Import Requirement the Commodity/Merchandise may be subject to other Partnering Government Agency Requirements and/or Documentation

The below listed by agency are the most common, but it is the supplier's responsibility to alert Starboard <u>prior to shipping</u> if any Item/s on the Purchase Order are subject to any Regulatory Compliance Requirements or Restrictions by both Customs and/or any other Government Agency, both US and International.

i. Food and Drug Administration (FDA)

The Food and Drug Administration is responsible for protecting the public health by ensuring the safety, efficacy, and security of human and veterinary drugs, biological products, and medical devices; and by ensuring the safety of our nation's food supply, cosmetics, and products that emit radiation.

It is the supplier's responsibility to advise if any item/s on the order are regulated by F&W prior to shipping. i.e. Cosmetics, Fragrances, Food, Candy, Liquor, Sunglasses, Medical Devices, Motion Sickness bands, Eyeglasses, electronic products emitting radiation, tobacco products, e-cigarettes, etc...

FDA, Prior Notice

The Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (the Bioterrorism Act) directs the FDA to take additional steps to protect the public from a threatened or actual terrorist attack on the U.S. food supply and other food-related emergencies. All products covered under the Food and Drug Administration's Bio-Terrorism Act must comply with all requirements of the act including, but not limited to the registration and **prior notice** regulations of such act.

All Suppliers, whether pre-paid or collect must provide Starboard Cruise Services, Inc. all pertinent information required for **prior notice filing** and in accordance with the time frames of the FDA Act. Any Supplier not complying with the laws of the FDA Bio-Terrorism Act will be subject to a minimum \$1,000 fee per FDA product type. Additional fees may be incurred for detention, examination, seizure, storage, handling, transportation and any other charges



associated with the shipment as deemed applicable by Starboard Cruise Services, Inc. This may include and is not limited to any civil or criminal sanctions that may be imposed as a result of non-compliance. In addition, the Supplier will be subject to all civil and criminal punitive actions that may be assessed by the FDA for non-compliance.

For all merchandise subject to FDA Prior Notice, the following information is required on the commercial invoice or other document accompanying <u>each</u> shipment:

- FDA Registration number
- Manufacture Name/Address (actual Manufacturer not supplier)
- Shipper Name Name/Address
- Product Name
- Product Code
- Quantity

FDA, Import Requirements

The following additional elements must be included on the Commercial Invoice or other document accompanying the FDA regulated shipment:

- Complete Name and Address of the Manufacturer (or grower) and their FDA registration number. (actual manufacturer not supplier)
- Country of Production/Manufacture
- Identification of Each Article (including the common, usual name or market name, the quantity described at the smallest package size, and the lot or code numbers or other identifier)
- English language description of each item shipped.
- The FDA product code, if known.
- Unit of Measure i.e. Proof Liter, Units, Pieces, etc.
- The Foreign establishment (manufacturer) must add Starboard as a Known Importer

If the item is a "Drug" supplier must provide, i.e. may apply to cosmetics/beauty

 NDC (National Drug Code) The NDC, or National Drug Code, is a unique 10-digit or 11- digit, 3-segment number, and a universal product identifier for human drugs in the United States.

If the items are Eye or Sun Glasses

- Device Listing Number:
- DFE (Device Foreign Exporters Registration Number)
- DEV (Device Foreign Manufacture's Registration Number)
- Impact Resistance Test/Drop Ball Test

All FDA regulated item shipped to the United States (including bonded warehouses) must meet FDA requirements.

The Seller hereby guarantees that, as of the date of shipment or delivery, the food products comprising the shipment or delivery are not adulterated or misbranded within the meaning of the



Federal Food, Drug and Cosmetic Act, and are not articles which may not, under the provisions of

section 404, the Act, be introduced into interstate commerce. In cases in which the Buyer has supplied to the Seller the design for the product in accordance with paragraph 10 (Designs), the Seller shall be responsible for furnishing the Buyer with required ingredient and nutrition information for purposes of composing labeling that complies with FDA regulations.

For more information please see the FDA website at: www.fda.gov

ii. Alcohol and Tobacco Tax and Trade Bureau (TTB)

The Alcohol and Tabacco Tax and Trade Bureau regulates and collects taxes on trade and imports of alcohol, tobacco, and firearms within the United States. It is the supplier's responsibility to advise if any item/s on the order are regulated by TTB prior to shipping.

- Liquor or Tobacco shipments that move from a TTB export warehouses (EW) must be provided with documentation (i.e. TTB F 5200.14, TTB F 5200.11, etc..) as required by TTB to expedite:
 - (a) proper clearance of Starboard US Customs bonded warehouse entry /or
 - (a) receipt into the Starboard Cigarette TTB export warehouse
 - Identify if the product is SM cigars, LG cigars, roll your own tobacco, pipe tobacco, etc.
 - Provide the applicable unit/s of measure based on type (i.e. sticks, packs, case, etc.)

iii. Consumer Product Safety Commission (CPSC)

Button Cell and Coin Battery Business Guidance Example: watches and toys

The Reese's Law was signed on Aug. 16, 2022, and the rule published on Feb. 9, 2023, mandated federal

Safety requirements for button cell & coin batteries to eliminate or reduce the risk of injury for children.

- General Certificate of Conformity (GCC) required for watches
- CPS (children's product certificate) required for toys
- Certificate of compliance for other items containing batteries not specified above
- The packaging for the overall product must bear a warning.
- The product itself must bear a warning, if practicable.
- Accompanying instructions and manuals must include all the applicable warnings.

iv. U.S. Fish & Wildlife Services (F&W)

The United States Fish and Wildlife Service is an agency of the US Federal Government dedicated to the management of fish, wildlife, and natural habitats.

It is the supplier's responsibility to advise if any item/s on the order are regulated by F&W prior to shipping.

For all other merchandise subject to F&W, the following information is required on the commercial invoice:

- Common name
- Scientific name
- Country of origin

v. CITES (Fish & Wildlife Services regulations for endangered species)

CITES is the Convention on International Trade in Endangered Species of Wild



Fauna and Flora. CITES permits conserve protected species by complying with the Fish and Wildlife laws which are regulated. It is the supplier's responsibility to advise if any item/s on the order are regulated by CITES prior to shipping.

Suppliers shipping product(s) requiring CITES permits must complete the documentation prior to exporting merchandise.

- The CITES permit number must be noted on the Bill of Lading as being required and the original permit must be attached to the Bill of Lading or Airway Bill at the time of shipment being exported.
- CITES Permit must match; Shipper, CNEE, quantity and items shipped and invoiced.
- Starboard purchase orders with CITES cannot be comingled with non-cities purchase orders, they must ship separately and must be exported on separate transportation documents to its final destination.

For additional information please visit the USDA Website https://www.cites.org/

vi. United States Department of Agriculture (USDA), Lacey Act

The overall mission of USDA is to protect and promote food, agriculture, natural resources and related issues. It is the supplier's responsibility to advise if any item/s on the order are regulated by USDA prior to shipping.

The most common USDA regulated item currently imported by Starboard are wood products, and finished goods containing wood, regulated under the Lacey Act.

 Items subject to the Lacey Act will require that you provide a Lacey Act Declaration otherwise known as PPQ Form 505

For additional information please visit the USDA Website https://www.usda.gov/

vii. Environmental Protection Agency (EPA)

Environmental Protection Agency regulates the import and export of environmentally sensitive products, materials and wastes into and from the United States. It is the supplier's responsibility to advise if any item/s on the order are regulated by EPA prior to shipping.

The most common EPA regulated item currently imported by Starboard are Jewelry/Leather cleaners and composite wood products, and finished goods containing composite wood products.



For Jewelry/Leather cleaners

Must provide in writing if the product is Negative or Positive for TSCA certification

For Composite Wood Products

Effective March 22, 2019 they are required to be certified as TSCA Title VI compliant by an EPA TSCA Title VI TPC with all the required accreditations.

Composite wood products affected under TSCA are:

- Hardwood Plywood
- MDF, including thin MDF
- Particleboard
- •

The supplier may also communicate if the item qualifies for a product exemption, under this regulation such as:

"(1) Any finished good that has previously been sold or supplied to an end user, an individual or entity that purchased or acquired the finished good in good faith for purposes other than resale. For example, subparts B, C, and D of this part do not apply to antiques or secondhand furniture. (2) Hardboard. (3) Structural plywood, as specified in PS 1-07, Voluntary Product Standard—Structural Plywood (incorporated by reference, see § 770.99). (4) Structural panels, as specified in PS 2-04, Voluntary Product Standard—Performance Standard for Wood-Based Structural-Use Panels (incorporated by reference, see § 770.99). (5) Structural composite lumber, as specified in ASTM D5456-06, Standard Specification for Evaluation of Structural Composite Lumber Products (incorporated by reference, see § 770.99). (6) Oriented strand board. (7) Glued laminated lumber, as specified in ANSI/AITC A190.1-2002, Structural Glued Laminated Timber (incorporated by reference, see § 770.99). (8) Prefabricated wood I-joists, as specified in ASTM D5055-05, Standard Specification for Establishing and Monitoring Structural Capacities of Prefabricated Wood I-Joists (9) Finger-jointed lumber. (10) Wood packaging, including pallets, crates, spools, and dunnage..."

For full details see Code of Federal Regulations Citation 40 CFR Part 770

If item is made of or contains composite wood and does not qualify for a product exemption, will

require the following:

- The vendor will need to provide a certification. The certification must come from an EPA recognized company
- The finished goods must include a label: fabricator's name, the date the finished good was produced (in month/year format), and a TSCA Title VI compliance statement.

The vendor will need to include a statement from the supplier that the composite wood



- products are TSCA Title VI compliant. "I certify that all chemical substances in this shipment comply with all applicable rules or orders under TSCA and that I am not offering a chemical substance for entry in violation of TSCA or any applicable rule or order under TSCA."
- Provide Records on Request. When EPA requests, make available within 30 days
 records identifying 1) the panel producer and the date the composite wood products
 were produced; and 2) records identifying the supplier, if different, and the date the
 composite wood products (or component parts/finished goods) were purchased.

For additional information please visit the EPA Website: https://www.epa.gov/

- g. How and When to send Documentation
 - i. Accompanying ALL shipments (Central Stock, Cross Dock, DSD Orders):

INSIDE the Lead Carton (carton 1 of X), located on Pallet No. 1 of the shipment

- Copy of Packing list
- Copy of Purchase Order
- ii. For Duty Free/Bonded and/or TTB shipments to the Starboard Distribution Center, documentation must be received by the Starboard Customs Department <u>via email</u> a minimum of <u>1 to 2 business days</u> prior to shipment departure from origin.
 - Commercial Invoices (see section e. commercial invoice requirements)
 - Packing Lists (see section d. packing list for requirements)
 - Transport Document (B/L or AWB) (see section b. transport document for requirements)
 - Any additional PGA required regulatory documents

Email address: mia starboard cdc@starboardcruise.com



5. <u>General Loading and Packaging</u> <u>Guidelines</u>

a. Carton Packing Guidelines

i. General Guidelines

- Each carton must contain merchandise for only one Starboard Purchase Order
- Use new cartons constructed of a minimum 200Lb/sq. in. test corrugate for packaging. The corrugate should be clean. For hardboards, use corrugates of a minimum of 275 lb. / sq. in.
- To ensure integrity of cartons, use new cartons, not cartons previously used.
- The gross weight of each carton must not exceed 55 lbs.
- A carton must not exceed the dimensions of a standard pallet (48"x 40")
- A carton must not exceed 6 cubic feet. (0.1699 M3)
- A carton must not be smaller than 1 cubic foot. (0.0825 M3)
- Pack merchandise in the same trans-pack stated on the Purchase Order

ii. Central Stock orders

• Only one ITEM No. (SKU) is allowed per carton

iii. Cross Dock and DSD orders

- More than one ITEM No. (SKU) is allowed per carton since quantities per ITEM No. (SKU) are generally small and orders are pre-packed to a specific ship. All items of each ITEM No. (SKU) in the carton should be inner packed and labeled with STB ITEM No. and Quantity per inner pack
- Where the goods are intended for foreign destinations they must be packaged in accordance to appropriate international regulations

b. Carton Marking Guidelines, Non-EDI (Not engaged in Electronic Data Interchange)

All cartons sent to Starboard Cruise Services, Inc. must be labeled. The purpose of the label is to connect the physical units of a Supplier's shipment with our Purchase Order, electronic information, and shipment documents.

i. General Guidelines

- Carton markings must be large enough to be easily read.
- Carton Label size should be approximately 4" X 6".
- Use only smudge-proof labeling ink and high-quality paper.
- If marking carton itself, use uniform stencil for all markings.
- All cartons must be clearly marked with the following information.
 - Ship from (Shipper Name, Address information)
 - Ship To (Starboard Distribution Center)
 - Starboard Purchase Order Number
 - Quantity of units in carton
 - o Carton No. X of Y
 - Carton Weight



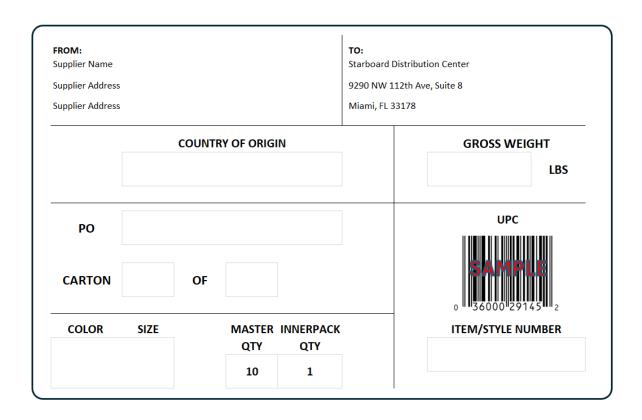
- o Country of Origin
- o Mark "Fragile" and "up" arrow, if applicable.
- Do not over pack or under pack the carton.
- Do not place strapping on individual cartons.
- Seal packing cartons with good quality security tape. All tapes must be moisture/temperature resistant and have an adhesive quality that resists drying in transit.
- Place carton inserts above and below merchandise to prevent the contents from knife cuts when opening.
- All liquid products must have a sealed cap.
- For folded items and items packed in polybags, place the tag so that the UPC/EAN
 is visible and accessible to scan without violating the item packaging.
- Perishable Goods must have Human Readable expiration dates on the export cartons
- Merchandise must be packaged as a unit together with warranty, box, and other
 applicable materials pertaining to each item to avoid kitting. Any kitting performed
 by Starboard will be at supplier's expense and applied in the form of an expense
 offset chargeback fee. Examples: Sunglasses with case, must be packaged and
 shipped each in their individual case. and Watches must be packaged in their
 individual case/box, warranty card(s), and manual
- Hazardous Materials (fragrance, nail polish, relevant cosmetics etc.) as defined by International Air Transport Association (IATA), International Maritime (IMO), or US Title 49 of the Code of Federal Regulations (CFR49), must be properly packaged, labeled, and designated in packaging as required by the appropriate dangerous goods regulations.
- Only the following Hazardous Materials are currently accepted by Starboard DC.
 - Perfumery Products **UN# 1266**, Must only be ordered by Beauty/Fragrance Dept
 - o Lithium Batteries **UN# 3481 & 3091**, Must only be ordered by Watches Dept Any new UN Number must be reviewed and approved by Logistics.



ii. Central Stock Orders, must also include below information

- UPC Barcode and Number corresponding to the item packed in the carton
- Color (if applicable)
- Size (if applicable)
- Master Quantity and Inner Pack (if applicable)

Non-EDI Label Sample for Central Stock



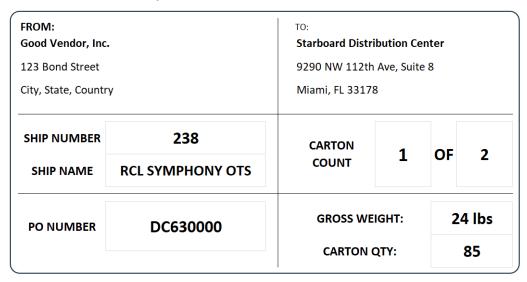
Downloadable sample label available on our website: https://logistics.starboardcruise.com/finance-logistics/



iii. For X-dock and DSD orders, must also include below information

- Ship name
- Ship number

Non-EDI Label Sample for Cross-Dock/DSD



Downloadable sample label available on our website: https://logistics.starboardcruise.com/finance-logistics/

c. Carton Label Location (for all shipment types)

- The carton label must be applied to the upper right-hand corner of one of the narrow sides of the case. See image below.
- The label should be applied in a way that it is visible to the outside when packed on a pallet
- Do not allow the label to cover any other important information.
- All purchase order and store numbers on the label must be clearly separated from numbers which are internal to the supplier and must be legible and at least as large as those numbers.

d. General Pallet Guidelines

Merchandise must be shipped on standard 48" x 40" pallets or slip sheets (slip sheets are exclusive for Ocean shipment to Starboard Distribution Center), unless otherwise authorized. Floor loaded shipments (truck or container) will result in an expense offset non-compliance chargeback.

<u>Wooden Pallets</u> must comply with USDA Wooden Packing Material Regulation.

USDA Wood Packing Material Regulation requires that wooden packing materials such as pallets, crates, boxes, and dunnage be either heat treated or fumigated with methyl bromide, in accordance with the IPPC guidelines and marked with an approved international mark certifying treatment.

See Guidelines, Final Rule, and ISPM15 documents.

Note: Plastic Pallets are an acceptable alternative to wooden pallets, excluding U.S.P.S pallets.



e. Pallet Packing/Configuration

i. General Guidelines

- Orders with 10 or more loose cartons must be palletized, with all palletization costs covered by the shipper.
- Cartons from the same Purchase Order should be on the same pallet. Mixed pallets are allowed only if the pallet limit is exceeded.
- Pallets must be tightly shrink-wrapped from top to base for protection.
- Use additional strapping when possible to prevent shifting; strapping is required for liquor shipments.
- Cartons must fit within pallet edges without overhang to prevent damage.
 Oversized items require approval before shipping.



ii. For Central Stock & Cross Dock PO's to Miami Distribution Center

- Multiple POs can be commingled on a single pallet if they are complete PO's
- Standard pallets should be of the following size based on mode and destination. The dimensions are expressed in Width, Length, and Height. Via Air: 48 in (121.92cm) x 40in (101.6cm) x 50in (152.4 cm) *Varies by Airline Via Ocean: 48 in (121.92cm) x 40in (101.6cm) x 85in (215.90cm) Via Truck: 48 in (121.92cm) x 40in (101.6cm) x 80in (203.2cm)

iii. For Direct Ship Deliveries PO's

- For same ship, port, and delivery date can be commingled (Note: All PO numbers on a single pallet must be visibly marked on the outside of the pallet for easy identification)
- iv. Standard pallets should be of the following size based on mode and destination. The dimensions are expressed in Width, Length, and Height. Air to Ships: 48 in (121.92cm) x 40in (101.6cm) x 50in (152.4cm) *Varies by Airline Ocean to Ships: 48 in (121.92cm) x 40in (101.6cm) x 69in (175.26cm)