

## **Las Vegas Sands Policy on Corporate Political Contributions and Expenditures**

This Policy on Corporate Political Contributions governs corporate political contributions and other campaign expenditures by Las Vegas Sands (the “Company”) and its majority-owned subsidiaries. Unless otherwise noted, this Policy applies to both the U.S. and international markets in which the Company does business or may do business in the future.

We believe the Company has a responsibility to advance policies that support the health of our business, our host communities around the world, and our Team Members, contractors, and suppliers. To provide transparency into these activities, the Company has adopted a policy to disclose our political contributions and expenditures. We believe this policy will serve the Company’s interests in promoting public policies of concern and educating elected and public officials about our business.

Las Vegas Sands is committed to conducting business ethically, with integrity, and in accordance with the law. Fundamental to that commitment includes the compliance with rules, regulations, and standards governing our interaction with government officials, including our disclosure and accountability regarding political contributions and expenditures. The Company’s political expenditures are made in support of the interests of Las Vegas Sands and not the personal political interests of any of its officers and directors.

### **Personal Team Member (Employee) Contributions**

LVS supports Team Members becoming personally involved in their communities and in the political process but does not permit the use of corporate resources for personal political matters. Team Members must always make clear that their views and actions are their own, and not those of the Company. LVS will not reimburse Team Members for political contributions. In addition, giving money, gifts, products, or services to government officials in exchange for official action is strictly prohibited. Team Members must not use their position with the Company to coerce or pressure other employees to make contributions to or support or oppose any political candidates, elections, or ballot initiatives.

### **Corporate Contributions**

To the extent legally permitted we support the election of candidates whose views align with the Company’s and in particular candidates that are supportive of the democratic norms and institutions which are vital to the functioning of our democracy. We encourage compromise and dialogue which we believe are critical actions necessary for elected officials in a democracy.

We have established Political Contribution Approval Guidelines for corporate contributions. Those guidelines require that our Chairman & CEO and President & COO approve all political contributions in advance of their execution. The Company's Compliance Committee will review such corporate contributions and payments on an annual basis to ensure alignment with the Company's policy.

Subject to that approval the Company may consider corporate contributions to (a) candidates running for state or local office; (b) state or local political parties and committees; (c) entities operating under section 527 of the Internal Revenue Code that may engage in political activity ("527 Committees"); and (d) support issue or ballot measure campaigns and committees. Such contributions may include, in accordance with applicable law, appearances by candidates at the Company's facilities or events.

### **Political Action Committees**

Federal law does not permit corporations to contribute their own funds to federal candidates, political parties, or most other political committees. U.S. law does permit companies to establish a political action committee to solicit voluntary employee donations to contribute to federal candidates and other committees regulated by the Federal Election Commission ("FEC"). The Company has created the Las Vegas Sands Political Action Committee ("Sands PAC") for this purpose. Contributions to federal candidates and committees are made only through Sands PAC, in accordance with FEC regulations. To provide funding for Sands PAC, the Company periodically solicits voluntary contributions from eligible employees. The Company fully discloses all Sands PAC activity on reports filed with FEC, as well as on its website.

The Company also, from time to time, may form additional Political Action Committees. Any such activity will also be disclosed through required reports and on the Company's website.

### **Political Donations Disclosure**

The Company will publish annual updates on its Investor Relations website that specify each political donation made during the preceding 12-month period. The disclosures will be made for each of the following: State and Local political contributions (including 527 Committees), total Trade Association contributions (including the non-deductible percentage used for the purpose of lobbying), Independent Expenditures (as defined by the FEC), expenditures in support of ballot measures, contributions to 501(c)4 organizations, and contributions made via PACs affiliated with the Company.