

LVS Global Policy

Policy Title:	Preventing Discrimination and Harassment Policy		
Division:	Global	Department:	Compliance
Date Created:	May 2021	Approved by:	Patrick Dumont, President & Chief Operating Office, Zac Hudson, EVP-Global General Counsel, Randy Hyzak, EVP-Chief Financial Officer.
Date Approved:	July 2021	Next Review Date:	July 2022

Global Policy

1 POLICY STATEMENT

Las Vegas Sands Corp., and its subsidiaries and affiliates, including Sands China Ltd. and Marina Bay Sands Pte. Ltd. (collectively “LVS” or the “Company”), is deeply committed to the principles of equal opportunity in employment without regard to race, color, religion, sex, age, sexual orientation, gender identity, genetic information, disability, veteran status, or any other status protected by law. The Company is strongly committed to fairness and equal opportunity in employment, and, to that end, we will not tolerate harassment of or discrimination towards its Team Members in any form, including sexual harassment, whether by fellow Team Members, Supervisors, Managers, Officers, Directors, or by anyone who interacts with the Company such as vendors, contractors, consultants, agents, or guests. Everyone at the Company is responsible for ensuring that our workplace is free from prohibited discrimination and harassment, and everyone is expected to avoid any behavior or conduct that could reasonably be interpreted as prohibited discrimination or harassment. Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings, and business-related social events.

2 SCOPE

This Policy applies to the Company as previously defined. If any provision of this policy conflicts with local laws or regulations, the impacted LVS business shall implement a Jurisdictional Policy addressing these conflicts.

3 DEFINITIONS

Definitions are provided within the context of the policy. Terms not otherwise defined shall follow the definitions specified in the Code of Business Conduct and Ethics.

4 APPLICATION AND RESPONSIBILITIES

A culture that ensures and promotes respect for diversity and inclusion of different experiences, cultures, viewpoints, and backgrounds fosters an environment that reflects a meaningful commitment to our corporate values and objectives. Accordingly, the Company is welcoming, responsive, and respectful of all individuals because of our fundamental commitment to all Team Members to create and maintain a safe, positive, diverse, and inclusive work environment that values individual differences and enables every Team Member to contribute and develop to the level of their potential. Training and discipline are essential measures to combat discrimination

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and harassment when they occur in the workplace, but only the proactive promotion of diversity, inclusion, and respect can assist in dismantling root causes of undesirable behavior such as discrimination and sexual harassment. To that end, the Company requires that:

All Team Members are responsible for knowing and adhering to this Policy, this includes but is not limited to, recognizing, respecting, and positively responding to the diversity of guests and suppliers of the Company as well as that of their fellow Team Members.

LVS Management and Senior Leadership are responsible for implementing Company policies, procedures, hiring practices, and systems that support and encourage diversity; and for creating a positive, diverse and inclusive work environment that values individual differences and enables every Team Member to contribute and develop to the level of his or her potential with the goal of creating and maintaining a safe working environment for all Team Members.

5 REQUIREMENTS OF THE POLICY

A. Prohibited Conduct

- (1) Discrimination:** The Company does not discriminate on the basis of race, color, religion, sex, age, sexual orientation, gender identity, genetic information, disability, veteran status, or any other status protected by law. The Company is strongly committed to fairness and equal opportunity in employment, and, to that end, we will not tolerate discrimination against our Team Members in any form, whether by fellow Team Members, Supervisors, Managers, Officers, Directors, or by anyone who interacts with the Company such as vendors, contractors, consultants, agents, or guests.
- (2) Harassment:** It is against Company policy for any Team Member to harass another Team Member on the basis of race, color, religion, sex, national origin, age, sexual orientation, gender identity, genetic information, disability, veteran status or any other status protected by law by (1) creating an intimidating, hostile or offensive work environment, (2) unreasonably interfering with a Team Member's work performance or (3) otherwise adversely affecting an individual's employment experiences or opportunities. A Team Member found to be violating this policy will be subject to disciplinary action, up to and including termination.
- (3) Sexual Harassment:** Harassment on the basis of sex is unlawful and a violation of Company policy and will not be tolerated. It is the Company's policy that no Team Member, either male, female, or non-binary, should be subjected to unsolicited or unwelcome sexual overtures or conduct or both, be it either verbal or physical.

It is also against Company policy for any Team Member, male, female, or non-binary, to sexually harass another Team Member by:

- making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature; or
- making submission to or rejection of such conduct the basis for employment decisions affecting the Team Member; or
- creating an intimidating, hostile or offensive working environment by such conduct based on another's gender or non-gender identification.

B. Reporting and Non-Retaliation¹

- (1) **Reporting:** Early reporting and intervention are the most effective methods for resolving actual or perceived incidents of harassment. Any instance of discrimination or harassment, whether witnessed or experienced, on the basis of race, color, religion, sex, age, sexual orientation, gender identity, genetic information, disability, veteran status or any other status protected by law is to be reported immediately either verbally or in writing to the Team Member's immediate Supervisor, department head and Human Resources.
- (2) **Alternative Reporting:** The Company recognizes that in some cases a Team Member may not feel comfortable reporting discrimination or sexual harassment to management within the department or to Human Resources. In such circumstances, a Team Member may use one of the alternative methods for reporting discrimination or harassment listed in the supplemental information section of this policy. In the case of an emergency, contact Security immediately.
- (3) **Non-Retaliation:** No disciplinary or retaliatory action of any nature will be taken against any Team Member for reporting in good faith discriminating or harassing conduct or for cooperation in the investigation of discriminating or harassing conduct. All Team Members who report or are witnesses involved in any investigation of discrimination or sexual harassment are protected from any retaliation of any kind and must report any retaliation as soon as possible. Any Team Member found to have retaliated against another Team Member (i) for reporting; (ii) for cooperation in the investigation of a report; or (iii) to prevent a report of discriminating or harassing conduct will be subject to discipline up to and including termination of employment.

C. Confidentiality of Reports and Investigations

Complaints will be treated as confidential to the fullest extent possible in light of the need to investigate the complaints. With regard to reports of sexual harassment specifically, the identity of each of the following individuals will be kept confidential to the fullest extent possible: (i) the target of the harassment, if not self-reported; (ii) the person who reports an incident of sexual harassment; (iii) any witness who provides information regarding an incident of sexual harassment; and (iv) the person who allegedly committed the sexual harassment. Any information gathered as part of an investigation into a complaint of sexual harassment must also be kept confidential to the fullest extent possible, except as reasonably necessary to comply with applicable laws and regulations, and only disclosed to the extent consistent with a thorough and impartial investigation.

D. Investigation and Remediation

- (1) **Investigation:** Upon the receipt of a complaint of discrimination or sexual harassment, an investigation will be initiated immediately into the conduct complained of, and appropriate action will be taken in response to the complaint. All investigations of discrimination or harassment will be conducted in a prompt, consistent, thorough and impartial manner. The investigation will be conducted by either Human Resources, Compliance, Investigations, Legal, an outside resource, or a combination of the foregoing, or another department or person depending upon the individual facts, in as timely a fashion as is practical in light of all of the relevant circumstances. Every complaint of discrimination or harassment will be documented from initial reporting to investigation and resolution.

¹ The *Reporting and Non-Retaliation* parts of this policy are in accordance with the global **Reporting and Non-Retaliation Policy**, which Team Members may wish to review.

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The person(s) who is the target of the harassment, regardless of whether or not that individual is the one who initially makes the discrimination or harassment complaint and the accused Team Member(s) will be notified of the outcome of the investigation within thirty days of the conclusion of the investigation. If a Team Member is dissatisfied with the outcome of an investigation, they may appeal the decision in accordance with the local property policies for handling of disciplinary inquiries.

- (2) **Remediation:** If, as a result of the investigation, the Company has reason to believe that the accused Team Member engaged in alleged harassing behavior, then that Team Member will be subject to immediate disciplinary action applied in a consistent manner, up to and including termination of employment.
- (3) **Disclosure:** Every complaint of discrimination or harassment will be documented from initial reporting to investigation and resolution, and disclosed as required.

E. Mandatory Discrimination and Harassment Prevention Training

All Team Members are required to participate in discrimination and harassment prevention training on an annual basis. All new hires are required to complete harassment and discrimination prevention training within their first thirty days of employment. The Human Resources department is responsible for ensuring that training is completed. In addition, the Company’s discrimination and harassment prevention policies and procedures will be communicated to all Company Officers and Directors of the Board upon joining the organization and thereafter on an annual basis.

6 POLICY EXCEPTIONS

There are no exceptions to the Preventing Discrimination and Harassment Policy.

7 OWNERSHIP

This Policy is owned by the Senior Vice President of Global Human Resources.

A committee comprised of representatives from Human Resources, Compliance, and Legal will meet at least annually to review any cases of sexual harassment for the purpose of determining the effectiveness of this policy and if necessary, devising better solutions. The committee will also determine if any changes to this policy or the procedures for reporting such violations are warranted or additional tools are needed.

8 POLICY ACCESS

Company Policies are accessible to all Team Members via the Central Repository for Policies.

Las Vegas
Policies & Procedures (NAVEX PolicyTech)
Macao
Policies & Procedures (NAVEX PolicyTech)
http://MyNet/Policies and Procedures
Singapore
Policies & Procedures (NAVEX PolicyTech)
http://onembs.marinabaysands.com/sites/Compliance/Corporate Policies/LVS

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LINKS TO RESOURCES, FORMS, AND SUPPLEMENTAL INFORMATION

Human Resources

Team Members are always encouraged to talk to their immediate Supervisor; but if that is not appropriate or possible, Team Members may contact Human Resources directly. We want to resolve any such problems quickly and effectively.

United States	Singapore	Macao
702.923.9228	+65 6688-8989, followed by option #5	Sands Macao: 8983 8473 Venetian: 8118 6147/ 8118 6146 Parisian: 8111 6000 Londoner: 8113 7601/8113 7602

Compliance Departments

Team Members may report complaints of discrimination or harassment directly to the Company's Compliance Department Monday to Friday between the hours of 8:00 a.m. and 6:00 p.m. All reports of harassment will also be reported to the Compliance Committee.

United States	Singapore	Macao
Contact Number: 702.923.9960 Contact Email: compliance@sands.com	Contact Number: +65 6688 3384 Contact Email: compliance@marinabaysands.com	Contact Number: +853 811 82 067 Contact Email: Compliance_VML@sands.com.mo

Ethics Hotlines

Team Members may also call the Company's Ethics Hotlines if they wish to speak with a live operator employed by an outside agency or may visit www.lvscethics.com to file a report using the Company's outside agency's secure website, which is available 24 hours a day, seven days a week. Reports to the Ethics Hotline may be made anonymously.

United States	Singapore	Macao
888.469.1536	StarHub: 800-001-0001 followed by 888-469-1536 at prompt; SingTel: 800-011-1111 followed by 888-469-1536 at prompt	0-800-111 and English prompt 888-418-1029

Governmental Bodies

Las Vegas	Singapore	Macao
Equal Employment Opportunity Commission and Nevada Equal Rights Commission Team Members may report complaints of discrimination or sexual harassment to the federal Equal Employment Opportunity Commission (EEOC) or the Nevada Equal Rights Commission (NERC) or both. The local EEOC office may be contacted at 1.800.669.4000, and the NERC may be reached at 702.486.7161.	Tripartite Alliance for Fair and Progressive Employment Practices (TAFEP) 80 Jurong East Street 21, #02-05, Devan Nair Institute for Employment and Employability, Singapore 609607 Tel: 6838-0969 https://www.tal.sg/tafep/Contact-Us	Macau Labour Affairs Bureau (DSAL) Team Members may report complaints of discrimination or harassment to the Labour Affairs Bureau - Head Office at +853 2856 4109 .

More Information:

- ✓ [Code of Business Conduct & Ethics \(English\)](#)
- ✓ [Reporting and Non-Retaliation Policy \(English\)](#)
- ✓ [Team Member Handbook](#)

APPENDIX A: Examples of Behaviors that may be Considered Harassment

The following are examples of types of behaviors that, depending upon the circumstances, may be considered harassment:

- Epithets, slurs or negative stereotyping;
- Cyber-bullying;
- Stalking;
- Threatening, intimidating or hostile acts;
- Written or graphic material that is placed on walls, bulletin boards or elsewhere on the Company's premises that belittles, shows hostility or aversion toward an individual or group;
- Verbal or physical acts that purport to be "jokes" or "pranks" but are hostile or demeaning;
- Sexual harassment.

The following are specific, non-exclusive examples of behavior, which, depending upon the circumstances may be considered sexual harassment:

- Leering at the body of another;
- Whistling at someone or making catcalls;
- Unwelcome touching or contact;
- Subtle or overt pressure for sexual favors;
- Making unwelcome sexual compliments, propositions, innuendoes, or suggestions;
- Telling sexually explicit, offensive, or suggestive jokes;
- Sexually oriented "kidding" or "teasing;"
- The use of foul or obscene language or gestures;
- The displaying of obscene printed or visual material;
- The sending of emails or texts with sexually explicit content or jokes;
- Remarks about a person's characteristics;
- Turning work discussions into sexual topics;
- Asking about a person's sexual experience or activities;
- Continued and unwanted requests or attempts to create or continue a "dating" or other personal relationship;
- Repeatedly asking a person to socialize during off-duty hours when the person has said 'no' or has indicated he/she is not interested (supervisors in particular should be careful not to pressure their employees to socialize).

These are just a few examples of behaviors that may constitute sexual harassment. This list is not meant to be exhaustive, but rather illustrative of the types of behaviors that may constitute sexual harassment.