

# LVS Global Policy

<b>Policy Title:</b>	<b>Reporting and Non-Retaliation Policy</b>		
<b>Division:</b>	Global	<b>Department:</b>	Compliance
<b>Date Approved:</b>	April 2021	<b>Approved by:</b>	Patrick Dumont, President & Chief Operating Officer
<b>Next Review Date:</b>	April 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 committed to maintaining a culture of compliance that promotes the highest standards of honesty and integrity. To sustain this culture, the Company relies on each and every one of our Directors, Officers, Team Members, contractors and agents (“Covered Persons”) to conduct Company business ethically, by following our Code of Business Conduct and Ethics, Company policies, and all applicable laws, rules or regulations. We also rely on all Team Members and other Covered Persons to promptly report, and cooperate with any investigation of, any violation of the policies, laws, rules, or regulations.

The Company strictly prohibits any form of retaliation against anyone who in good faith makes a complaint, raises a concern, provides information or otherwise assists in an investigation or proceeding regarding any conduct that he or she reasonably believes to be in violation of our Code of Business Conduct and Ethics, Company policies, or applicable laws, rules or regulations.

### 2 SCOPE

This Policy applies to all LVS businesses and Team Members and other Covered Persons globally. If any provision of this policy conflicts with local laws or regulations, the impacted LVS business shall notify the Global Chief Compliance Officer and implement a Jurisdictional Policy addressing these conflicts.

### 3 DEFINITIONS

**Good Faith Report or Complaint:** A report of any conduct that the reporter reasonably believes to be in violation of our Code of Business Conduct and Ethics, Company policies, or applicable laws, rules or regulations. Making a *good faith* report does not mean that your suspicions have to be correct or proven true. Nor do you need to be certain that the conduct violated the law or Company policy. It simply requires that you provide truthful and accurate information and have a reasonable basis to believe that the reported behavior occurred or is going to occur. Reports made to harass or that intentionally include false information are not *good faith* reports.

**Retaliation:** Includes any adverse action, not otherwise warranted, that is meant to, or could be likely to, deter or punish someone for making a complaint or participating in an investigation of a potential ethical violation. This can include any adverse consequences to the terms or conditions of a Team Member’s employment. Retaliation also includes interfering with attempts to make a good faith report or participate in an investigation.

All content is proprietary information of Las Vegas Sands Corp. and its subsidiaries (the “Company”). Misuse or unauthorized disclosure of Company information is prohibited and constitutes grounds for disciplinary action up to and including termination. The Company reserves the right to change its policies, procedures and benefits with or without notice and those changes may not always be reflected in these pages.

**Mandatory Reportable Conduct (“MRC”):** Any conduct that is a violation of any government law, rule or regulation, or of our Code of Business Conduct and Ethics or other Company Policies. Appendix A sets forth examples of what may or may not be MRC.

#### **4 APPLICATION AND RESPONSIBILITIES**

**All Team Members** are responsible for knowing and adhering to this Policy, including, but not limited to, the requirements of mandatory reporting and non-retaliation.

**Managers and Supervisors** are responsible for ensuring that their Team Members review and are familiar with this Policy. Managers and Supervisors are also responsible for promptly escalating any report communicated to them or any situations of which they become aware to the Compliance Department or through the Ethics Hotline. They are also responsible for enforcing this Policy’s prohibition against retaliation, as set forth below, and reporting any incidents of retaliation.

**LVS Senior Leadership** are responsible for promoting compliance with this policy by assuring that reports are promptly and fairly investigated and that no retaliation takes place against any Team Member.

#### **5 REQUIREMENTS OF THE POLICY**

##### **A. Reporting**

###### **(1) Mandatory Reporting**

All Team Members and Covered Persons are required to report any Mandatory Reportable Conduct (“MRC”) known to, or suspected by, them using one of the methods detailed below. Any manager or supervisor receiving such report is required to immediately inform the Compliance, Legal or Human Resources Departments of the report.

###### **(2) Other Reporting**

In accordance with the Company’s Open Communications philosophy, all Team Members are encouraged to raise any work-related concerns to department Supervisors and Managers or through any of the methods set forth below. Team Members have the right and responsibility to bring Management’s attention to complaints or concerns resulting from day-to-day application of Company policies and procedures.

###### **(3) Methods for Reporting**

You should never hesitate to come forward with a good faith report. When in doubt, it is always better to report a concern, as well as concerns or reports that are received from people outside the Company, such as vendors and other third parties. There are a number of different ways to report concerns or any retaliatory conduct:

- Your Manager or Supervisor
- Any other Manager you trust
- Any member of the Compliance Department
- Any member of the Legal Department

- Any member of the Human Resources Department
- The Ethics Hotline

The Ethics Hotline is a confidential website and telephone line, operated by an external third-party vendor that allows you to report concerns 24 hours a day. If you prefer, the Ethics Hotline allows you to report concerns anonymously. However, providing your name and contact information allows us to contact you directly for further information as we investigate your concern, which may expedite the time it takes us to respond. Contact information for the Ethics Hotline is included in the Resources section of this Policy.

After making the report, identify and secure any potentially pertinent information or documents you may already have in your possession. If the reported behavior or retaliatory conduct continues after a report was filed, please report the continued misconduct using any of the methods set forth above.

## **B. Retaliation is Strictly Prohibited**

The Company **strictly prohibits any form of retaliation** against anyone who in good faith makes a complaint, raises a concern, provides information or otherwise assists in an investigation or proceeding regarding any conduct that he or she reasonably believes to be in violation of our Code of Business Conduct and Ethics, Company policies, or applicable laws, rules or regulations. The Company prohibits anyone from being retaliated against even if their complaints are not substantiated by an investigation. Individuals are not protected if they knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith.

## **C. Responding to Reports and Conducting Investigations**

- (1) Any report involving actual, suspected, or potential Mandatory Reportable Conduct shall be reported to the Compliance Department and, except as set forth below, investigated under the direction of the Global Chief Compliance Officer or the Global General Counsel. Depending on the specifics of the investigation the Global Chief Compliance Officer and/or the Global General Counsel may delegate the responsibility to lead and conduct the investigation to other individuals in the Company. All MRC investigations, whether conducted by Compliance or assigned to a different department, shall be tracked by the Compliance Department in a designated tool.
  - Any concern or report related to the terms or conditions of employment, including, but not limited to, claims of harassment, discrimination, wages and hours violations, disability, or workplace injury, shall be investigated by the appropriate human resources department.
  - Any concern or report related to (i) the safety or security of any person; (ii) to theft of property of the company or any patron or guest; (iii) the integrity of any gaming operation; or (iv) the security of any information technology systems, shall be investigated by the Security Department.
- (2) No person may conduct their own investigation without the prior written consent of the Global General Counsel or Global Chief Compliance Officer.
- (3) All Team Members are required to fully and truthfully cooperate with any investigation as directed by the Company.

## 6 POLICY ENFORCEMENT AND EXCEPTIONS

Failing to comply with this Policy may be grounds for disciplinary action, up to and including termination of employment.

Exceptions to this Policy shall only be made on approval of the Global General Counsel or Global Chief Compliance Officer.

## 7 OWNERSHIP

The Global Chief Compliance Officer is the owner of this Policy.

## 8 POLICY ACCESS

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

United States
<a href="#">Policies and Procedures (NAVEX PolicyTech)</a>
Macao
<a href="#">Policies &amp; Procedures (NAVEX PolicyTech)</a> <a href="http://MyNet/Policies and Procedures">http://MyNet/Policies and Procedures</a>
Singapore
<a href="#">Policies &amp; Procedures (NAVEX PolicyTech)</a> <a href="http://onembs.marinabaysands.com/sites/Compliance/Corporate Policies/LVS">http://onembs.marinabaysands.com/sites/Compliance/Corporate Policies/LVS</a>

## LINKS TO RESOURCES, FORMS, AND SUPPLEMENTAL INFORMATION

### Questions? Contact:

#### ✓ Compliance Department

Compliance Global	Global Chief Compliance Officer
	<a href="mailto:compliance@sands.com">compliance@sands.com</a> / 702-923-9960
Sands China Ltd.	Chief Compliance Officer of SCL & VML
	<a href="mailto:compliance@sands.com.mo">compliance@sands.com.mo</a> / +853 811 82304
Marina Bay Sands	Chief Compliance Officer of MBS
	<a href="mailto:compliance@marinabaysands.com">compliance@marinabaysands.com</a> / +65 668 83384

#### ✓ Legal Department

Corporate Global	Global General Counsel
	702-449-9311
Sands China Ltd.	General Counsel
	+853 811 82366
Marina Bay Sands	General Counsel
	+65 6688 1218

#### ✓ Ethics Hotline

<a href="http://www.lvscethics.com">www.lvscethics.com</a>
888-469-1536 (U.S.)
800-011-1111 SingTel or 800-001-0001 StarHub, followed by 888-418-1029 (Singapore)
0-800-111 Followed by 888-418-1029 (Macao)

### More Information:

- ✓ [Code of Business Conduct & Ethics \(English\)](#)
- ✓ Team Member Handbook

## **APPENDIX A: Examples of Mandatory Reportable Conduct**

What conduct is considered MRC?

Violation of any government law, rule, or regulation to which the Company is subject:

- The FCPA and other government anti-bribery laws, including the books and records provisions of the FCPA
- Data Privacy laws or regulations
- International Trade laws or regulations, including U.S. sanctions laws
- Antitrust laws or regulations
- Anti-Money Laundering laws or regulations
- Insider trading laws
- Violations of Gaming Regulations
- Sexual harassment or abuse

Fraud, Theft, and Abuse of Trust:

- Fraudulent financial reporting
- Payment or receipt of kickbacks by LVS Team Members
- Conflicts of interest
- Conversion or misappropriation of funds or assets
- Expense reporting fraud
- Improper use of LVS assets

Other Company Policies:

- Intentional misrepresentation of information to external or internal auditors
- Retaliation against an individual who has made a good faith report regarding a compliance or ethical issue
- Misuse or unauthorized disclosure of Company trade secrets or proprietary information
- Misappropriation or misuse of third party trade secrets or intellectual property
- Improper lobbying or political contributions
- Any involvement in human trafficking activity
- Any threat to the physical safety of a Team Member or guest

What conduct is not considered MRC? Remember this does not mean the conduct is appropriate and you are still free to report it under any of the methods set forth in the policy.

- Poor management practices
- Favoritism by a supervisor
- Inefficient business practices
- Workplace personal relationships
- Inaccurate compensation
- Tensions with coworkers or managers
- Failure to comply with company standards or guidelines for business tasks

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