

LVS Global Policy

Policy Title:	Anti-Corruption Policy		
Division:	Global	Department:	Compliance
Date Created:	March 2017	Approved by:	Patrick Dumont, President & Chief Operating Officer, Zac Hudson, EVP - Global General Counsel, Erik Sandstedt, Senior Vice President & Global Chief Compliance Officer
Last Review:	October 2025		

GLOBAL POLICY

1 POLICY STATEMENT

Las Vegas Sands Corp., and its subsidiaries and affiliates, including Sands China Ltd., Marina Bay Sands Pte. Ltd., Fortis and Sands Digital Services companies, (collectively “LVS” or the “Company”), are committed to complying with all applicable anti-corruption laws, regulations, and policies and will not tolerate any form of bribery or corruption. To this end, this Anti-Corruption Policy sets forth the basic definitions and principles of the Company’s Anti-Corruption Program. Neither the Company, nor anyone affiliated with the Company, shall pay, offer to pay, receive or solicit any bribe, kickback, or other form of corrupt payment, whether directly or indirectly through third parties.

This Policy should be read in conjunction with the [Code of Business Conduct & Ethics](#) and our [Anti-Corruption SOP](#).

2 SCOPE

This Policy applies to all “Covered Persons” as defined in the Code of Business Conduct and Ethics. This includes all Team Members globally, as well as any person acting on behalf of the Company, such as a consultant or agent. It also includes all LVS businesses, including subsidiaries, branches, affiliates, majority owned or consolidated joint ventures, and any designated minority owned or unconsolidated joint ventures. The term “You” in this Policy refers to a Covered Person.

3 DEFINITIONS

Anything of Value: Any benefit, whether tangible (like cash, cash equivalents, meals, travel, entertainment, and gifts), or intangible (like a job offer or recommendation). Anything of Value should be broadly construed for the purposes of our anti-corruption policies.

Bribe: The offer or exchange of money or anything of value with the intention of inappropriately influencing a person's judgment or conduct, especially when that person holds a position of trust.

Cash Equivalents: Items that are easily converted to cash including, but not limited to, bank drafts, travelers’ checks or pre-loaded gift cards from American Express, Visa, MasterCard, UnionPay, or other like providers or specific retailers.

Charitable Contribution: A monetary or in-kind contribution made to a public or private organization that qualifies for treatment as a charitable organization in the country in which it is organized, or to a non-profit institution, or to a public or private educational institution. Charitable contributions are donations that are freely given and intended to be charitable in nature, regardless of whether the Company receives some minor benefit in return, such as a modest meal, tickets to a fund-raising gala, or recognition in a brochure.

Complimentaries/Comps: Goods or services provided on behalf of the Company for the purposes of reinvestment, development, recovery, retention, appreciation, or fulfillment of contractual obligations.

Consultant: Any party, other than a Professional Advisor (as defined below), engaged by the Company to furnish services of an advisory or consulting nature.

Critical Jurisdiction: Any jurisdiction in which the Company does business or is contemplating doing business.

Development Projects: Projects in support of the Company's efforts to improve or expand its existing operations or to investigate or expand into new or emerging markets.

Entertainment: Any form of hospitality offered to a third party. Entertainment can include but is not limited to meals or attendance at an athletic, theatrical, or cultural event.

Facilitation Payment: A payment to a Government Official designed to secure or speed up a routine government action to which the applicant is entitled, such as processing a visa, scheduling an inspection, securing mail pick-up or delivery, or getting utilities connected.

Foreign Corrupt Practices Act ("FCPA"): The U.S. anti-corruption law that serves as the basis for much of LVS' anti-corruption program. It can be found at <https://www.justice.gov/sites/default/files/criminal-fraud/legacy/2012/11/14/fcpa-english.pdf>

Foreign Extortion Prevention Act ("FEPA"): The U.S. law that makes it illegal for any foreign government official to demand, receive, or agree to receive a bribe from a U.S. company or individual, or any person while in the U.S. territory in exchange for or in connection with obtaining or retaining business.

Gift: Anything of Value given voluntarily without any payment in return. For the purposes of our anti-corruption policies, Gifts do not include Patron Comps, Charitable Contributions, Sponsorships, Entertainment, or Patron tips to Team Members who are in tip eligible positions.

Government Official: Any officer or employee of, or any person acting in an official capacity for or on behalf of, a domestic or foreign government, a public international organization, or any department, agency, or instrumentality thereof, or any candidate for political office. For the purposes of our Anti-Corruption Program, Government Officials can fall into one of two categories:

- **Decision Making Officials ("DMOs"):** Government Officials who have the power or authority to affect our business.
- **Non-Decision Making Officials ("Non-DMOs"):** Government Officials who do not have the power or authority to affect our business.

Kickback: The return of a part of a sum received, usually as part of an illicit agreement or as a result of coercion.

Knowledge: Knowing of the existence of a fact, or consciously or recklessly disregarding that fact.

Lobbyist: A person who is registered with appropriate authorities and engaged by the Company for the purpose of advocating for the adoption or amendment of laws. This term does not include parties retained to assist the Company with complying with existing laws or regulations.

Patron: Any actual or potential casino customer (whether or not registered in a player program).

Professional Advisor: A licensed attorney, licensed accountant, law firm, accounting firm, financial institution chartered by the federal government or by any state, underwriter or investment banker regulated by state or federal regulatory authorities, licensed real estate agent or broker, or outside investigator engaged to provide professional services to the Company.

Relative or Close Associate (“RCA”): An immediate family member (*i.e.*, a parent, sibling, spouse, child, or grandchild), or any individual with a significant relationship to a Government Official who could influence or serve as a conduit to that Government Official. Examples of Close Associates include but are not limited to people who share an intimate relationship or a close business relationship.

Sponsorship: Monetary or in-kind corporate support for another entity’s civic, community, cultural, educational, or commercial event that is not charitable in nature, but rather made for the purpose of receiving a benefit in return, such as advertising, promotion, brand awareness, or the like.

Supplier: Any company or individual providing goods and/or services, including any company or individual that is currently quoting business, or is interested in providing goods and/or services to LVS.

Travel: Transportation and lodging.

4 APPLICATION AND RESPONSIBILITIES

It is the responsibility of all Covered Persons to comply with both the letter and the spirit of this Policy and all applicable anti-corruption laws. Specifically:

- You may not make, offer to make, receive, or solicit any payment of money or anything of value that is prohibited by this Policy or any applicable laws.
- You must maintain accurate books and records reflecting all transactions in which you are involved.
- You must complete all anti-corruption training as required by the Company.
- You must report any violations of this policy as set forth in the LVS Reporting and Non-Retaliation Policy.

In addition, all LVS managers are responsible for:

- Promoting awareness and understanding of this Policy and all related SOPs.
- Fostering a culture of compliance with the Company’s Anti-Corruption Program.
- Ensuring that the Company’s Anti-Corruption Program is adequate to prevent, detect, and remediate any violations of this Policy or all applicable laws.
- Maintaining a system of internal controls necessary to carry out this policy.

Any violation of this Policy or of any applicable anti-corruption laws or regulations can have very serious consequences for the Company. Failing to comply with this Policy can be grounds for disciplinary action, up to and

including termination.

5 REQUIREMENTS OF THE POLICY

A. PROHIBITION AGAINST BRIBING GOVERNMENT OFFICIALS

1. General Prohibition.

- a. All Covered Persons are strictly prohibited from paying, offering to pay, promising to pay, or authorizing the payment of money or Anything of Value to a Government Official or a Relative or Close Associate of a Government Official (RCA) to improperly influence an official act or decision, or to secure any other improper advantage in order to obtain or retain business.
- b. All Covered Persons are strictly prohibited from inducing, facilitating, or causing a third party or intermediary to do any act that would violate this Policy.
- c. Any Covered Person who receives a request for a payment of Anything of Value to a Government Official or an RCA, or who has knowledge of any of the activity described in (a) or (b) above, is required to immediately report such activity pursuant to the Company's [Reporting and Non-Retaliation Policy](#).

2. Provision of Anything of Value. Subject to the restrictions herein, the provision of Anything of Value to a Government Official or an RCA must comply with the specific authorization requirements set forth in the [Anti-Corruption SOP](#), [Third Party Travel, Gifts & Entertainment Policy](#), and [Approval and Authorization Policy](#).

3. Political Contributions. No Covered Person may contribute to any political party, political organization, candidate for public office, or elected official on behalf of the Company, or use Company funds or assets for such purposes, except as provided in the Company's [Corporate Political Contributions and Expenditures Policy](#) and [Political and Issue Advocacy Contributions SOP](#).

4. Charitable Contributions and Sponsorships. No Covered Person may make a charitable contribution or agree to a sponsorship on behalf of the Company, or use Company funds or assets for such purposes, except as provided in the Company's [Charitable Contributions and Sponsorship Policy](#) and [Charitable Contributions and Sponsorship SOP](#).

5. Lobbying Activities. Lobbyists retained in the United States for the purpose of advocating for the adoption or amendment of laws must be registered in the jurisdiction(s) where they operate, hired pursuant to our [Contracting Policy](#) and associated procedures, and actively supervised by our Government Relations and/or Communications department. Further, all lobbyists must comply with the [Corporate Lobbyist Expense Reimbursement Policy Regarding Meals, Entertainment, and Gifts to Government Officials/RCA's](#).

6. Comps. The prohibitions against bribing Government Officials also apply to Comps provided to Government Officials and RCAs. However, the provision of Comps to Government Officials and RCAs who are also patrons of our casinos may be permissible subject to the requirements set forth in our [Complimentary Policy](#) and [Politically Exposed Person Policy](#).

B. PROHIBITION AGAINST COMMERCIAL BRIBES AND KICKBACKS

1. All Covered Persons are strictly prohibited from requesting, soliciting, accepting or otherwise obtaining Anything of Value from any party with whom LVS does business except in accordance with the [Third Party Travel, Gifts & Entertainment Policy](#). In no case, even where otherwise permitted by the TG&E Policy, may you accept Anything of Value intended to improperly influence you in the performance of your duties at the Company.
2. All Covered Persons are strictly prohibited from paying, offering, or promising Anything of Value to any person related to a third party with whom LVS does business, except in strict accordance with the [Third Party Travel, Gifts & Entertainment Policy](#). Moreover, even if permitted under the TG&E Policy, and even where no Government Official is involved, you may not pay any Bribe, Kickback, or Anything of Value to any third party in order to improperly influence any act or decision of that person on behalf of their employer or company or to secure any other improper advantage. This applies even if you receive no personal benefit from the payment or if such payment benefits the Company.

C. PROHIBITION AGAINST FACILITATION PAYMENTS

1. Covered Persons are not permitted to make Facilitation Payments, except in the following two very narrow circumstances:
 - a. If the personal safety, security, or freedom of movement of a Team Member is at risk, a Facilitation Payment may be made and then reported to the Global Chief Compliance Officer immediately after the fact.
 - b. Where extreme circumstances, such as health, safety, or material impact on the business would result absent payment, the Global Chief Compliance Officer may grant a written exemption to this provision, but only if raised prior to any such payment.
2. If a Facilitation Payment is made under either of the limited exceptions set forth above, the payment must be properly documented in the Company's books and records as a Facilitation Payment and an explanation must be provided.
3. Any Covered Person who receives a request for a Facilitation Payment must immediately report that request pursuant to the Company's [Reporting and Non-Retaliation Policy](#).

D. REPORTING AND RECORD KEEPING

1. Any Covered Person who becomes aware of a violation or potential violation of this Policy is required to report that violation immediately pursuant to our [Reporting and Non-Retaliation Policy](#). Failure to report a violation can be grounds for disciplinary action, up to and including termination.
2. As noted above, any Covered Person who receives a request for a payment of Anything of Value that would run afoul of this Policy must immediately report that request pursuant to the Company's [Reporting and Non-Retaliation Policy](#).

- The Company is required to make and keep books, records, and accounts that accurately and fairly reflect the transactions and dispositions of the assets of the Company in reasonable detail. We do this to ensure that all funds spent by the Company are used for legitimate business purposes. You are required to ensure that any records of funds spent or authorized by the Company are truthful, complete, and accurate to the best of your knowledge. You may not use personal funds to do what you are not allowed to do with Company funds.

6 POLICY EXCEPTIONS

Any exceptions to this Policy must be approved in advance by the Global Chief Compliance Officer. SOPs issued by the Global Chief Compliance Officer under this Policy may delegate specific exception approval to the Regional Chief Compliance Officers or other designees.

7 OWNERSHIP

The Global Chief Compliance Officer shall be the owner of this policy.

8 POLICY ACCESS

Company policies are accessible to all Team Members via PolicyTech at the following links:

- United States, Fortis and Sands Digital Services: [Policies and Procedures \(NAVEX PolicyTech\)](#)
- Macao & Singapore: [Policies & Procedures \(NAVEX PolicyTech\)](#)

LINKS TO RESOURCES, FORMS, AND SUPPLEMENTAL INFORMATION

For more information, please contact your local Legal or Compliance Department:

<p><u>Corporate:</u> Legal: +1 702-449-9311 Compliance: +1 702-923-9960, or compliance@sands.com</p>	<p><u>Sands China Ltd:</u> Legal: +853 811 82366 Compliance: +853 811 82304, or compliance@sands.com.mo</p>	<p><u>Marina Bay Sands:</u> Legal: +65 6688 1218 Compliance: +65 6688 3384, or compliance@marinabaysands.com</p>
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Or contact the Ethics Hotline:

Please scan or visit www.lvscethics.com.

Live operators are also available at the local telephone numbers listed on the website.

More information:

- [Anti-Corruption SOP](#)
- [Approval and Authorization Policy](#)
- [Aviation Screening Procedure](#)
- [Charitable Contributions and Sponsorship Policy](#)
- [Complimentary Policy](#)
- [Conflict of Interest](#)
- [Contracting Policy](#)
- [Contractor Expense Reimbursement Policy](#)

- [Corporate Political Contributions and Expenditures Policy](#)
- [Political and Issue Advocacy Contributions SOP](#)
- [Supplier Code of Conduct](#)
- [Third Party Travel, Gifts & Entertainment Policy](#)
- [Team Member Business and Travel Expense Policy](#)
- [Reporting and Non-Retaliation Policy](#)

FCPA Explained

The Company's rules prohibiting the bribery of Government Officials are derived from our obligation to comply with U.S. and foreign laws, including the Foreign Corrupt Practices Act ("FCPA"), federal and state anti-bribery laws, and the laws of other jurisdictions prohibiting bribery and corruption.

The FCPA makes it illegal to:

- Make a payment, an offer, or a promise of payment of money or anything of value directly or through a third party,
- To a foreign official or official of a public international organization or knowing the payment will be passed on to such a person,
- For the corrupt purpose of influencing that person,
- To obtain or retain business.

It is also illegal under U.S. law for a foreign government official to demand, receive, or agree to receive a bribe from a U.S. company or individual, or any person while in the U.S. territory in exchange or in connection with obtaining or retaining business.

PAYMENT: The definition of "payment" under the FCPA is very broad. It includes anything of value, such as cash payments, as well as any kind of gift or in-kind payment. The following are examples of payments that have formed the basis of FCPA cases in the past:

- Cash, cash equivalents, or gift cards.
- A scholarship for a child of a foreign official to attend university in the United States.
- Employment for an official or an RCA of the official.
- A donation to a charity where the official is on the board or acts as a fundraiser.
- Use of a company recommended by the official to act as a supplier, vendor, or agent.
- Lavish hospitality, including travel, expensive meals, and gifts. Specific examples include, but are not limited to:
 - \$10,000 spent on dinners, drinks, and entertainment for a visiting foreign Government Official.
 - A \$12,000 birthday trip for a Mexican Government Official that included visits to wineries and dinners.
 - A trip to Italy for eight Iraqi Government Officials that consisted primarily of sightseeing and included \$1,000 in "pocket money" for each official.
 - A trip to Paris for a Government Official and his wife that consisted primarily of sight-seeing in a chauffeur-driven vehicle.

It is important to know that LVS is not protected simply because a payment is made through an intermediary. It is unlawful to make a payment to a third party, knowing that all or a portion of the payment will go directly or indirectly to a foreign official, and the term "knowing" includes conscious disregard and deliberate ignorance. In this regard, companies are frequently held liable under the FCPA for payments made by consultants, agents, distributors, and joint venture partners.

GOVERNMENT OFFICIAL. Although the FCPA applies only to non-U.S. Government Officials, our policy applies to all Government Officials, including those in the U.S. Thus, it applies to any officer or employee of the federal government or a state or local government, any department or agency thereof, or any person acting in an official capacity. It also applies to candidates for political office.

In many countries, the government controls all or part of various companies and enterprises. In these cases, all employees of the State-Owned Enterprise (“SOE”) are considered Government Officials under the law and our policy. This can be true even if the government is only a minority owner of an enterprise. Some examples of Government Officials who work for SOEs include:

- Doctors and purchasing officials working for national health services.
- Employees of companies owned in whole or substantial part by a government, such as a state-controlled telecommunications or utility company.
- In China, unions are often considered a component of the government and members of the union or guild may be considered Government Officials.

CORRUPT PURPOSE. The word “corruptly” is used in the FCPA in order to make clear that the offer, payment, promise, or gift, must be intended to induce the recipient to misuse his/her official position; for example, to wrongfully direct business to the payer or his client, to obtain preferential legislation or regulations, or to induce a foreign official to fail to perform an official function. This term is defined and interpreted broadly. In essence, any payment to a Government Official made while or in anticipation of them making a decision or taking an official action could be viewed as being made for a “corrupt” purpose.

The FCPA does not require that a corrupt act succeed in its purpose. The offer or promise of a corrupt payment can be enough to create liability on its own.

OBTAIN OR RETAIN BUSINESS. The final element of an FCPA violation is the intent to “obtain or retain business.” These terms are broadly construed; they are not limited to payments to facilitate the award or renewal of a contract. They can cover any action that makes it more likely that an entity will increase or maintain its business position. It should also be noted that the business in question does not need to be with a foreign government or instrumentality. Some examples of payments made to obtain or retain business include:

- Paying bribes to customs officials to allow a patron to enter the country in order to play at our properties.
- Payments to assure receipt or renewal of a license or concession.
- Payments to obtain approval of construction or design permits.
- Payments to receive immigration or labor clearances.
- Payments to an inspector to overlook violations or deficiencies.

Complying with the FCPA and local anti-corruption laws can be complicated. If you have any questions or doubts, please contact the Compliance Department.