



Anti-Human Trafficking Policy

September 2017

INTRODUCTION

Guided by our values and beliefs, 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 integrity and social responsibility. Paramount to this commitment is the manner in which we treat our Team Members and guests, as well as the way in which those from whom we purchase goods and services treat their employees. This Policy outlines the efforts LVS makes to uphold these principles by refusing to support or tolerate human rights abuse in any facet of our business.

PURPOSE

To eliminate human trafficking, including sex trafficking, slavery, forced, involuntary or coerced labor, and child labor from our operations and global supply chain.

SCOPE

This Policy accords with international standards and national human trafficking laws of the relevant jurisdictions including:

- The U.N. Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the UNCTOC
- The Trafficking Victims Protection Act (TVPA) of 2000, as amended
- Macau Penal Code law number 6/2008
- Singapore Prevention of Human Trafficking Act

DEFINITIONS

Terms not specifically defined shall follow the definitions specified in the Code of Business Conduct and Ethics.

Human trafficking or “trafficking in persons” is an umbrella term for the act of recruiting, harboring, transporting, providing, or obtaining a person for compelled labor or commercial sex acts through the use of force, fraud, or coercion. Other terms employed interchangeably include involuntary servitude, slavery, and debt bondage.¹

Sex trafficking occurs when an individual is coerced, forced, or deceived into prostitution. An individual’s initial consent is not legally determinative; if they later revoke consent but are forced to continue prostituting, they become victims of sex trafficking. When a child is induced to perform a commercial sex act, the crime constitutes trafficking regardless of whether coercion, force, or fraud were used.²

¹ <https://www.state.gov/j/tip/rls/tiprpt/2013/210543.htm>

² <https://www.state.gov/j/tip/rls/tiprpt/2013/210543.htm>

Forced labor or “labor trafficking” encompasses the range of activities – including recruiting, harboring, transporting, providing, or obtaining – involved when an individual uses force or physical threats, psychological coercion, deception, or other coercive means to compel another to work.³

Child labor does not include all work performed by minors; rather, only that which harms their physical and mental development. Such labor deprives children of their childhood, potential, and dignity.⁴

APPLICABILITY

This Policy applies to all LVS businesses, Team Members, agents, contractors, subcontractors, and suppliers worldwide when acting within their scope of employment or contract with LVS.

POLICY

LVS will not tolerate and will not condone the use of human trafficking in any form, including sex trafficking, slavery, forced, involuntary or coerced labor, and child labor on our properties or by any Team Member, agent, contractor, subcontractor or supplier in the operation or support of our business. To that end, LVS shall, and requires that its businesses, Team Members, agents, prime contractors, subcontractors, and suppliers shall:

1. Not engage in or allow any form of human trafficking, whether by force, fraud, or coercion; or any form of involuntary servitude or slavery; or any form of sex trafficking or the procurement of any commercial sex act;
2. Not use any form of forced, involuntary or coerced labor, including through the use of:
 - threats of serious harm to, or physical restraint against, a person or another person; or
 - any scheme, plan, or pattern intended to cause a person to believe that, if the person did not perform such labor or services, that the person or another person would suffer serious harm or physical restraint; or
 - any abuse or threatened abuse of law or the legal process;
3. Not engage in, or support the use of child labor and shall comply with all applicable local child labor laws;
4. Not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers' licenses;
5. Not use misleading or fraudulent practices during the recruitment of employees or offering of employment, and shall endeavor to the extent possible to disclose to employees, in a format and language accessible to the employee, basic information regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions,

³ <https://www.state.gov/j/tip/rls/tiprpt/2013/210543.htm>

⁴ <http://www.ilo.org/ipec/facts/lang--en/index.htm>

housing and associated costs (if provided or arranged by LVS or its agents), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work. If required by law, LVS or its agents shall provide an employment contract, recruitment agreement, or other required work document in writing, which shall be in a language the employee understands;

6. Comply with all applicable local wages, benefits, and working hours labor laws;
7. Not charge employees recruitment fees and shall not use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
8. If required by law or contract, provide return transportation or pay for the cost of return transportation upon the end of employment;
9. If LVS or an LVS supplier or contractor provides, arrange housing for employees that meets the host country's housing and safety standards.

Team Member Compliance

LVS shall periodically review and evaluate its internal operations and its supply chain to identify and assess activity that potentially risks violating this Policy.

As part of its mandated annual Team Member training, LVS will include training on human trafficking to Team Members responsible for managing other Team Members as well as those Team Members responsible for its global supply chain. LVS will also provide targeted training to all public facing personnel (e.g., guest services, housekeeping, security) on how to spot and respond to suspected instances of human trafficking on our property. In addition, LVS will provide additional training to members of its global procurement team, who are tasked with communicating this policy to our contractors and suppliers. LVS will periodically assess awareness of, and compliance with, this Policy both internally and within our supply chain.

Third Party Compliance

LVS contractors and suppliers who supply any products or services are required to review this Policy and comply with it and with the LVS Supplier Code of Conduct. Such contractors and suppliers will be required to periodically certify that they (a) have read, understand, and comply with both the Policy and the LVS Supplier Code of Conduct, and (b) comply with the national human trafficking laws and labor standards of the countries in which they work.

Reporting

Any LVS Team Member that is informed of or witnesses a violation of this Policy, or is uncertain about the proper course of action relating to the matters addressed in this Policy, is encouraged to immediately contact his or her supervisor. If the issue is not resolved or the Team Member is not comfortable raising the issue with his or her supervisor, they should use other reporting channels including the LVS Ethics Hotline @

www.lvscethics.com. LVS will not tolerate any form of retaliation against a Team Member who reports a suspected violation of this Policy in good faith.

Any questions about this Policy may also be addressed to the Compliance Department, the Legal Department or the Human Resources Department.

Violations

LVS has a zero tolerance policy regarding any of its Team Members, agents, contractors, subcontractors or suppliers who engage in or support the use of human trafficking including sex trafficking, slavery, forced, involuntary or coerced labor, and child labor. Failure to comply with this Policy will result in disciplinary action up to and including termination of employment. If a contractor, subcontractor or supplier is found in violation of this policy, LVS will take prompt, remedial measures to address the violation, up to and including termination of the business relationship.

LINKS TO RESOURCES, FORMS, AND SUPPLEMENTAL INFORMATION

Questions? Contact:

✓ **Compliance Department**

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| Compliance Global | Global Chief Compliance Officer |
| | compliance@sands.com / 702-607-4621 |
| United States/Domestic | U.S. Compliance Officer |
| | compliance@sands.com / 702-607-4621 |
| Sands China Ltd. | Chief Compliance Officer of SCL & VML |
| | compliance@sands.com.mo / +853 811 82304 |
| Marina Bay Sands | Chief Compliance Officer of MBS |
| | compliance@marinabaysands.com / +65 668 85845 |

✓ **Legal Department**

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| Corporate Global | Global General Counsel |
| | 702-414-4713 |
| U.S. Domestic | General Counsel, Venetian Casino Resort, LLC |
| | 702-607-3163 |
| Sands China Ltd. | General Counsel |
| | +853 811 82366 |
| Marina Bay Sands | General Counsel |
| | +65 6688 1218 |

✓ **Ethics Hotline**

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| www.lvscethics.com |
| 888-469-1536 (U.S.) |
| 800-011-1111 SingTel or 800-001-0001 StarHub (Singapore) |
| 0800-111 Followed by 888-418-1029 (Macao) |