



**Anti-Human Trafficking  
Policy**

September 2019

## 1. POLICY STATEMENT

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”), are 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 LVS’s commitment to uphold these principles by refusing to tolerate human rights abuse in any facet of our business.

As part of that commitment, the Company condemns Human Trafficking in any form, including Sex Trafficking; forced, involuntary, or coerced labor; and Child Labor, in our operations and global supply chain.

## 2. SCOPE

This Policy accords with international standards and the Human Trafficking laws of the jurisdictions in which we operate, 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
- Article 153-A of the Macau Penal Code, as amended by Law 6/2008 criminalizing human trafficking
- The Singapore Prevention of Human Trafficking Act

## 3. 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.<sup>1</sup> Human Trafficking includes Sex Trafficking, Forced Labor and Child Labor, as defined below.
- Sex Trafficking** occurs when an individual is coerced, forced, or deceived into performing a commercial sex act. When a child is induced to perform a commercial sex act, the crime constitutes trafficking regardless of whether coercion, force, or fraud were used.<sup>2</sup>
- Forced Labor** or “labor trafficking” encompasses the range of activities – including recruiting, harboring, transporting, providing, or obtaining victims – involved when an individual uses force or physical threats, psychological coercion, deception, or other coercive means to compel another to work.<sup>3</sup>
- Child Labor** does not include all work performed by minors; rather, “child labor” that should be targeted for elimination is often defined as that which is mentally, physically, socially or morally dangerous and harmful to children. It deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development.<sup>4</sup>

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

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

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

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

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.

#### 4. APPLICATION AND RESPONSIBILITIES

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.

#### 5. REQUIREMENTS OF THE POLICY

##### A. Anti-Human Trafficking Generally

LVS will neither tolerate nor condone Human Trafficking – in any form – 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 requires its businesses, Team Members, agents, prime contractors, subcontractors, and suppliers to:

- i. Not engage in or allow any form of Human Trafficking;
- ii. Not use or tolerate Forced Labor, including through the use of:
  - a) threats of serious harm to, or physical restraint against, a person or another person; or
  - b) any scheme, plan, or pattern intended to cause a person to believe that if the person did not perform such labor or services, the person or another person would suffer serious harm or physical restraint; or
  - c) any abuse or threatened abuse of law or legal process;
- iii. Not engage in, or support the use of Child Labor and comply with all applicable child labor laws;
- iv. Not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or driver's licenses;
- v. Not use misleading or fraudulent practices in the recruitment of employees or offering of employment, and 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, 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;
- vi. Comply with all applicable labor laws, including those governing wages, benefits, and working hours;
- vii. Not charge employees recruitment fees and not use recruiters that do not comply with applicable labor laws of the country in which the recruiting takes place;
- viii. Provide return transportation or pay for the cost of return transportation upon the end of employment (if required by law or contract);
- ix. Arrange housing for employees that meets the host country's housing and safety standards (if provided by LVS or its agents).
- x. **Team Member Compliance** 0800-111 Followed by 888-418-1029 (Macao) or electronically, by logging onto the Ethics Hotline website at [www.lvscethics.com](http://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.
- xi. Any questions about this Policy may also be addressed to the Compliance Department, the Legal

Department or the Human Resources Department.

**B. Violations**

- i. LVS has a zero tolerance policy regarding any of its Team Members, agents, contractors, subcontractors or suppliers who engage in, support or tolerate any form of Human Trafficking. 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.

**6. OWNERSHIP**

This Policy is owned by the Global Chief Compliance Officer.

**7. POLICY ACCESS**

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

Las Vegas
<a href="https://lvsands.sharepoint.com/sites/sop/default.aspx">https://lvsands.sharepoint.com/sites/sop/default.aspx</a>
Macao
<a href="http://mynet/en/Macau%20Properties/Policies%20and%20Procedures">http://mynet/en/Macau%20Properties/Policies%20and%20Procedures</a>
Singapore
<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
	Compliance@sands.com / 702-607-4628
United States/Domestic	U.S. Compliance Officer
	Compliance@sands.com / 702-607-4628
Sands China Ltd.	Chief Compliance Officer of SCL & VML
	Compliance_VML@sands.com.mo / +853 811 82304
Marina Bay Sands	Chief Compliance Officer of MBS
	Compliance@marinabaysands.com / +65 668 85845

✓ **Legal Department**

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**

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)