



2023

MODERN SLAVERY STATEMENT



LAS VEGAS SANDS MODERN SLAVERY STATEMENT 2023

This statement is written and published in accordance with the requirements of the UK Modern Slavery Act 2015. It outlines the steps we and our subsidiaries have taken to prevent modern slavery and human trafficking in our business operations and supply chain during the financial year ending on December 31, 2023.



OUR COMMITMENT TO HUMAN RIGHTS

Sands is a global leader in developing and operating integrated resorts. We have attracted valuable leisure and business travel to our host communities and generated significant economic benefits through tourism, revenue, jobs, and business opportunities for local and diverse small and medium enterprises (SMEs), including suppliers, vendors and service providers. Our iconic properties have challenged long-standing conventions in the hospitality industry and transformed our host communities into some of the world's most well-known tourism and meeting capitals.

Our success has been driven by an unwavering commitment to the three pillars of our corporate responsibility strategy:

- **People:** Being the employer and partner of choice in our regions
- **Communities:** Keeping our regions strong
- **Planet:** Minimizing our environmental impact

At the foundation of these pillars lies a core principle: our steadfast commitment to human rights. In this regard, we have established comprehensive policies, procedures and internal controls to prevent any form of modern slavery in our business, operations and supply chain.

NEWSWEEK'S AMERICA'S MOST RESPONSIBLE COMPANIES 2024

We have again been recognized by Newsweek as one of America's Most Responsible Companies for 2024. The media outlet's partner for the ranking reviewed the top 2,000 public companies by revenue and focused on a holistic view of corporate social responsibility that considers three pillars: environment, social and corporate governance.



ORGANIZATIONAL STRUCTURE AND SUPPLY CHAINS

Our Business

We are headquartered in Las Vegas, Nevada, and have property holdings in the United States and across the globe. Through our majority ownership of Sands China Ltd., we own and operate a collection of integrated resorts in the Macao Special Administrative Region of the People's Republic of China. These properties include The Venetian Macao, The Londoner Macao, The Parisian Macao, The Plaza Macao and Sands Macao. In Singapore, we own and operate Marina Bay Sands, which is one of the region's most significant tourism, business and retail destinations.

Our integrated resorts feature premium hotels and accommodations, world-class gaming, expansive meeting and conference facilities, celebrity chef restaurants, luxury retail complexes, entertainment venues and other amenities that make our properties ideal destinations for work and leisure. We also own interests in two digital operations: Fortis Games, a video game developer and publisher with employees in the United States, the European Union and other parts of the world; and Sands Digital Services (SDS), a division of Sands with operations in the United Kingdom, the Americas and the European Union. SDS is authorized in the United Kingdom to provide business-to-business iGaming products to licensed online gaming operators.

Our Supply Chain

Our supply chain consists of more than 4,000 suppliers worldwide. In selecting and managing these suppliers, we promote strict compliance with our ethics and sustainability principles. All of our suppliers agree to the requirements outlined in our Supplier Code of Conduct, and we leverage our Sustainable Procurement Policy to source products and services that minimize adverse effects on the environment. Further, we prioritize working with local and diverse SMEs to be a catalyst for growth in the communities we serve. Throughout our company's history, we have consistently driven positive economic advancement in our host communities by creating quality jobs and meaningful local business opportunities.

Our procurement operations are centrally managed from our corporate headquarters; however, our local operating businesses have substantial authority to drive economic growth in their regions. Our largest procurement categories include food and beverage; furniture, fixtures and equipment; technology; and professional services to support our operations. Globally, more than 75% of our sourcing spend is with local businesses.

As outlined below, we have established detailed policies, procedures and internal controls to ensure that our procurement process is fair and our suppliers are fully vetted, monitored for compliance with our human rights requirements, and fairly treated throughout their relationship with our company.

POLICIES RELATING TO MODERN SLAVERY AND HUMAN TRAFFICKING PREVENTION

As a developer, owner and operator of world-class integrated resorts, we are keenly focused on ensuring that no form of modern slavery or human trafficking takes place at our properties or within our supply chain. To this end, we have enacted policies, procedures and internal controls to inform and guide our Team Members and business partners on doing business the right way. Beginning with our core values of excellence in business performance, impeccable service, innovation, sustainability, and fairness and honesty in all that we do, our policies instill all Sands Team Members with the duty to prevent, detect and report any acts that could signal potential human rights violations.

We have translated our core human rights statements and policies into multiple languages so that Team Members can understand them, and they are accessible to all Team Members through a centralized policy management system. English versions of these statements and policies can be found at www.sands.com/responsibility.

Human Rights Statement

We have adopted a Human Rights Statement that outlines our fundamental commitment to respecting and supporting internationally recognized human rights, including the prohibition against child and forced labor, freedom of association, and protection from any form of illegal discrimination, among other things. In our statement, we demonstrate clear commitment to upholding the highest legal and ethical standards and ensuring our operations satisfy international human rights principles. We also explain how that commitment is expressed in our workplace policies and practices, including but not limited to our Code of Business Conduct and Ethics, Human Trafficking Prevention Policy, Supplier Code of Conduct, and Reporting and Non-Retaliation Policy.

DOW JONES SUSTAINABILITY INDICES FOR WORLD AND NORTH AMERICA

In 2023, we were once again recognized on the Dow Jones Sustainability Indices (DJSI), with placement on the DJSI World Index for the fourth consecutive year and on the DJSI North America Index for the eighth time. Our Asia subsidiary, Sands China, was named to the DJSI World Index for the second consecutive year, along with a repeat appearance on the DJSI Asia Pacific Index.

We were the only two companies in the Casino and Gaming category listed on DJSI World for 2023, out of 19 companies invited to participate. In addition, Sands was the only company in the Casino and Gaming category listed on DJSI North America, and Sands China was one of only two companies in the Casino and Gaming category listed on DJSI Asia Pacific.

Code of Business Conduct and Ethics

Our Code of Business Conduct and Ethics (Code) serves as the backbone for our culture of ethics and compliance. The Code sets forth the following four core principles, which govern every aspect of the way we do business: Respect for Individuals, Doing Business Legally and Ethically, Protecting Our Company and Investors, and Enhancing Our Communities. The Code has an entire section dedicated to the prevention of human trafficking and forced labor and applies to all covered persons, which include Team Members, directors, officers, consultants, vendors and agents of the company. It highlights many of the critical steps we have taken on this important topic, including promulgating and enforcing our Human Trafficking Prevention Policy; requiring our suppliers to comply with that policy as well as our Supplier Code of Conduct; actively enforcing a zero-tolerance approach to human trafficking and forced labor; partnering with local governments, local law enforcement and nonprofit organizations in preventing modern slavery; training our Team Members to recognize and respond appropriately to any signs of modern slavery; and monitoring our third-party relationships to ensure workers are treated fairly.

Global Human Trafficking Prevention Policy

Our Global Human Trafficking Prevention Policy is guided by the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (UNTOC), also known as the Palermo Protocol. The policy clearly states that we will not tolerate any form of modern slavery or human trafficking in any area of our business or operations. Among other things, the policy prohibits covered persons from engaging in, supporting, facilitating or tolerating human trafficking in any form, and from using or tolerating forced labor in any part of our business, operations and supply chain. It also requires our senior management to actively promote awareness of these issues and all covered persons to report any suspected violations in line with our Reporting and Non-Retaliation Policy. Finally, the policy requires all third parties engaged by our company to make assurances regarding their compliance with international principles and the human trafficking laws of all applicable jurisdictions.

Supplier Code of Conduct

We strive to be a model corporate citizen and recognize the impact a global company such as ours can have on our local communities and the environment. Accordingly, we require our suppliers to be partners in our efforts to minimize potential harm that could be caused by our business and operations. In this regard, we require all suppliers to sign our Supplier Code of Conduct, which obligates them to respect and comply with the laws, regulations and best practices for the prevention of modern slavery.

First, the Supplier Code of Conduct requires all suppliers to comply with our Global Human Trafficking Prevention Policy and take proactive steps to minimize the potential for any form of forced, involuntary or coerced labor in their businesses or operations. For example, it prohibits suppliers from destroying, concealing, confiscating or otherwise denying access by employees to their identity or immigration documents. It also prohibits

the use of misleading and fraudulent practices in the recruitment of employees or in offers of employment. It requires that suppliers communicate the terms of employment with workers in languages they understand and prohibits suppliers from charging recruitment fees to employees or using recruiters who do not comply with local labor laws. Finally, it requires that workers be allowed to freely leave the workplace without retribution at the end of their shifts or upon resignation.

With respect to child labor, our Supplier Code of Conduct expressly prohibits our suppliers from employing anyone under the age of 15, unless they are specifically authorized to do so under local law. Moreover, suppliers may only employ juveniles under the age of 18 subject to certain conditions consistent with International Labour Organization Minimum Age Convention No. 138. It requires that suppliers maintain complete and accurate records verifying the age of all employees and have zero tolerance for any downstream violations – all of our suppliers are required to ensure that their own supply chains are compliant with relevant child labor laws and applicable international principles.

To enforce our Supplier Code of Conduct, we require all of our suppliers to adhere to the requirements of our Global Supply Chain Risk Management Framework, which is described in more detail below.

Reporting and Non-Retaliation Policy

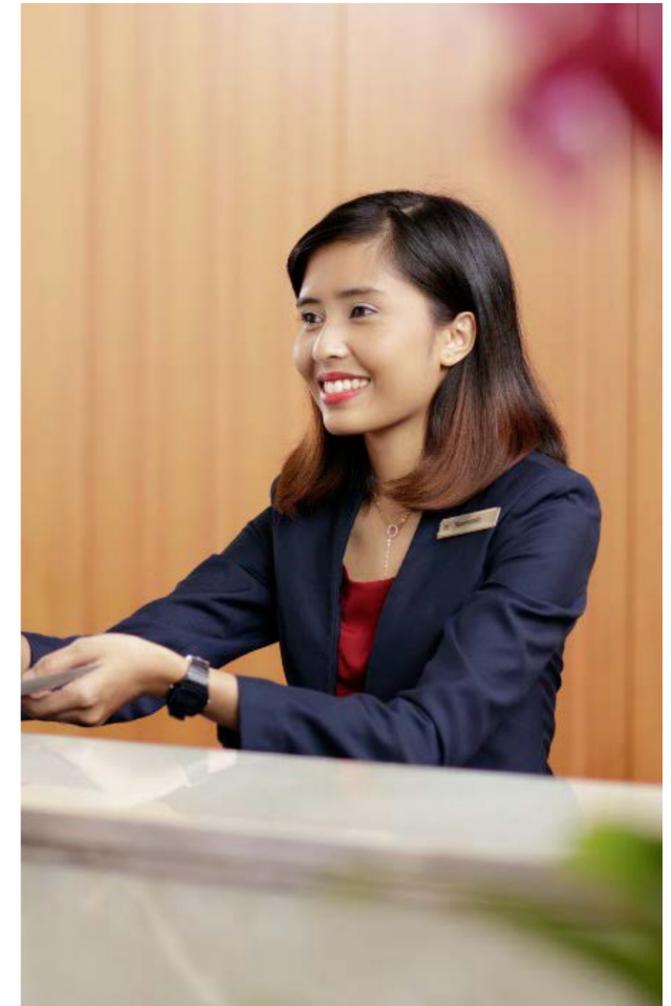
We maintain and enforce a strict Reporting and Non-Retaliation Policy. This policy requires all covered persons to report any actual or suspected violation of the Code, company policies, and applicable laws and regulations. The policy makes reporting mandatory and strictly prohibits any form of retaliation against people who raise concerns or cooperate in compliance investigations in good faith.

In support of this policy, we provide multiple channels for Team Members or anyone interacting with our company to raise potential concerns, including through our confidential ethics hotline that is operated by an external vendor 24 hours a day, seven days a week. The hotline is staffed by people who can speak to callers in their local languages and enables anonymous reporting should a reporter deem it necessary. The ethics hotline can be accessed via telephone, the internet or a QR code that is well-publicized throughout our properties, intranet, newsletters and compliance communications.

From our Code of Business Conduct and Ethics' section on human trafficking prevention:

WHAT CAN I DO?

"Be alert. Team Members who are in frequent contact with our guests, business partners, suppliers, potentially vulnerable workers and other parties with whom we come into contact are in the best position to observe potentially troubling behavior. When you see a concerning situation, evaluate it for signs of human trafficking or forced labor. If sufficient indicators are present, alert your supervisor immediately. They will assess the situation and notify security if appropriate. For everyone's safety, Team Members should not take direct action on their own."



DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MANAGEMENT

We recognize the risks associated with modern slavery are always evolving due to a variety of factors such as climate change, natural disasters, global pandemics, geo-political conflicts, and economic and supply chain instabilities. Therefore, we are vigilant about keeping our risk assessments, due diligence and other programmatic measures up to date.

We have both enterprise and compliance risk management functions that ensure our company is effectively addressing key risks in our business and operations. These functions report directly to the board of directors and are managed by senior leaders in the finance, legal and compliance departments. In addition, human trafficking-related issues are reviewed on a quarterly basis by our corporate compliance committee as well as operational compliance committees at our properties in Macao and Singapore.

This past year, we conducted a comprehensive human trafficking risk assessment. Based on that work, we identified three higher-risk areas that could potentially affect our business: sex trafficking, labor and recruitment abuses, and forced labor in our supply chain. We take these risks seriously and have developed a multifaceted approach to address them.

First, to address sex trafficking, which occurs when a minor is induced to engage in a commercial sex act or when a person of any age is induced to engage in a commercial sex act through force, fraud, or coercion, our resorts have highly trained surveillance and security teams to guard against all forms of inappropriate behavior, including any potential signs of sex trafficking. Further, our hotel operations teams, including front desk personnel and housekeeping staff, are trained to recognize and escalate any red flags for potential sex trafficking, and we work closely with local law enforcement to promptly address potentially problematic situations that may arise. Finally, while we believe the risks associated with human trafficking in our online businesses are remote, our online gaming products include technological and human controls to identify and respond to inappropriate communication, including possible recruitment, grooming or coercive activity that could potentially take place on our platforms.

Second, we are focused on addressing potential labor exploitation, which occurs when a person is forced, deceived or coerced into working for little or no pay under threat of violence or other penalties, as well as on debt bondage in which a person is trapped in a cycle of debt and forced to work indefinitely to repay it. These risks can be most acute in the leisure and hospitality industries when third-party recruitment agencies are employed to fill staffing needs. To address these risks, we have established a strong control environment that includes comprehensive third-party due diligence and monitoring procedures, among other avenues. We conduct risk assessments, trainings, inspections and audits to ensure our contractors are complying with all applicable laws and regulations, and require and verify that our recruiting agencies are only charging fees that are legal and reasonable. We also stay connected to our contracted employees through orientation sessions and regular check-ins to ensure they are aware of their rights and familiar with our reporting channels.



Third, we recognize the potential risks associated with forced labor and other unethical practices in our supply chain, including in its lower tiers, which may have less visibility and protection for workers. We are also sensitive to factors that can contribute to forced labor risks, such as short lead-in times, late payments, downward cost pressures, global supply chain instabilities, poor record keeping, subcontracting, and a lack of local regulations, enforcement or controls. To address these potential risks, we have developed a comprehensive global supply chain risk management framework, which consists of four phases: onboarding, risk identification, monitoring and evaluation, and relationship management. We also promote workforce development initiatives in our host communities. These efforts are described in more detail below.

Onboarding

Before suppliers are cleared to work with our company, we conduct stringent assessments for suitability via our third-party due diligence process, which categorizes businesses by risk level. All suppliers are reviewed against real-time due diligence monitoring systems and databases that assess various risks ranging from bribery and money laundering to human trafficking. Suppliers deemed as high risk must undergo a broader range of due diligence processes and procedures, such as more frequent due diligence rechecks and background investigations.

All supplier contractual agreements are linked to our Supplier Code of Conduct, which is aligned with international best practices to protect human rights, labor rights, worker health and safety, environmental compliance and responsibility, and overall ethics and compliance. We also encourage suppliers to promote the Sands Supplier Code of Conduct or a similar code of conduct with their vendors.

Risk Identification

As part of our Supplier Risk Evaluation Framework, we perform annual risk assessments for suppliers that conducted business with us in the previous year. We thoroughly assess risk in the areas of compliance (overall compliance risk as well as category-specific risk), business disruption (business reliance and financial risk) and social and environmental risk (health, safety, fair pay, and labor and slave labor risk). Using this assessment, we categorize suppliers into low, medium and critical risk levels.

Critical risk suppliers are those with the ability to significantly impact our business operations. These suppliers may be non-substitutable, provide critical services, be sourced at a high volume or have specific ESG risk factors.

From this assessment, we determine a course of action based on the supplier's risk level, with ongoing monitoring for suppliers deemed to be of medium risk or higher. Further evaluation of critical risk suppliers occurs through self-assessment surveys, site visits and audits performed by our personnel or third-party auditors.

Monitoring and Evaluation

To ensure our partners meet our standards, supplier management teams visit select vendors to review their performance and detect signs of violations. For suppliers that operate in regions and product categories that may be more prone to Supplier Code of Conduct violations, we enlist recognized third-party audit firms to conduct on-site assessments.

We conduct three types of ongoing supplier audits. First, our compliance organization completes due diligence evaluations, which are updated regularly for high and medium-risk suppliers. Second, our quality control team conducts audits of qualifications; on-site facilities, factories and project sites; data security; and other relevant areas for selected business categories, such as construction, furniture and lighting, gaming, food supply and technology. Finally, we engage independent third-party audit firms to conduct on-site audits for suppliers in select regions and categories based on criteria including:

- Type of products or services provided
- Regions in which suppliers are based
- Current and projected company spending with suppliers
- Feedback from our procurement and supplier quality teams

Relationship Management

If we or an independent third-party auditor identify a corrective need, we share audit findings and require an action plan to address the issue. For minor violations, we work with suppliers to remediate issues. Suppliers must follow identified protocols to establish corrective action, and we diligently manage these relationships.

For existing suppliers, we review corrective action plans to ensure they appropriately address audit findings and evaluate implementation of the corrective action plan through documentation or a re-audit of the supplier. In rare cases when the supplier is not cooperative on a meaningful corrective action plan or its implementation, we exit the supplier engagement.

For suppliers beginning a new engagement with our company, assessments are on a pass or fail basis, regardless of the method of assessment: third-party due diligence, qualification review or on-site factory evaluation. We do not proceed into business relationships with suppliers who are unable to meet our criteria.

DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MANAGEMENT CONTINUED

Workforce Development

In addition to our supply chain risk management approach, we also invest in workforce development programs to create meaningful opportunities for our Team Members and local workers. By advancing job skills and providing workers with access to stable employment and livable wages, we hope to alleviate conditions that create higher risks for people to become victims of modern slavery or human trafficking.

We have established a target to invest \$200 million in workforce development initiatives that support the career advancement of our Team Members and expand the skill sets of the local hospitality talent pool in our regions. Our efforts are primarily focused on five workforce development categories: hospitality-related hard skills, business-related soft skills, personal well-being, hospitality and workforce education, and advancement of underrepresented groups. With these efforts, we aim to help people succeed through training, development, and a strong physical, mental and social foundation; provide resources and tools that enable our suppliers and partners to increase business opportunities; and support higher education and learning programs for hospitality professionals and the local labor pool.

FTSE4GOOD INDEX SERIES INCLUSION

We were again included in the index series, which recognizes companies demonstrating strong environmental, social and governance practices and performance.

TRAINING AND AWARENESS

We require all Team Members to complete human trafficking prevention training during their onboarding and annually thereafter. The training is administered electronically, and training statistics are recorded and tracked. We provide robust training materials that were developed using guidance from relevant international conventions, including the Palermo Protocol, the UK Modern Slavery Act, the Trafficking Victims Protection Act of 2000, and other relevant statutes and guidance documents. The training includes best practices for preventing modern slavery in the leisure and hospitality industries such as identifying red flags, handling potentially problematic situations, and remaining vigilant around security measures and appropriate reporting channels. The curriculum also includes the impact of modern slavery on victims, survivors and the community.

As noted above, our security, surveillance and hotel operations teams (including our front desk and housekeeping staff, among others) receive targeted training on the red flags of sex trafficking, suspicious activity typologies and proper escalation protocols. We also provide our Team Members with reminder cards and handbooks that serve as easy reference guides in the event that they encounter circumstances that could signal potential acts of modern slavery.

Finally, we undertake regular communication campaigns through email, social media, and digital and physical signage throughout our properties to raise awareness of our programs and processes for countering modern slavery and human trafficking. We also make concerted efforts to raise awareness about these important issues through participation in observances such as the United Nations World Day Against Trafficking in Persons and National Human Trafficking Prevention Month.

EFFECTIVENESS AND PERFORMANCE INDICATORS

We continually review our activities to ensure we are promoting human rights and effectively protecting against the dangers of modern slavery and human trafficking. The organizational metrics we tracked in 2023 included:

Counter-Human Trafficking Training

	Number Completed	% Completed
Directors and above	1,057	97%
Managers	4,585	99%
Supervisors/specialists and rank and file	30,435	98%
Total	36,007	98%

Specialized Counter-Human Trafficking Training

	Total
Number of Team Members trained	2,614
Total training hours	4,752

Security Personnel Training

	Total	% Completed
Counter-human trafficking	1,661	97%
Discrimination and harassment	1,649	96%

Code of Business Conduct and Ethics Training

	Number Completed	% Completed
Directors and above	1,127	97%
Managers	4,744	99%
Supervisors/specialists and rank and file	31,096	98%
Total	39,967	98%

Compliance

	Total
Significant instances of noncompliance with labor laws	0
Incidents of non-conformance with the Supplier Code of Conduct	0

Supply Chain

	2022	2023
New suppliers that agree to enforce a code of conduct	100%	100%
New suppliers screened using social and environmental criteria	100%	100%
On-site company audits	116	125
On-site third-party audits	10	15
Corrective plans in place or implemented	10	15
Number of labor incidents	0	0

Investment In Workforce Development

	FY2023
Compliance training	\$5,010,441
Team Member hard skills	\$47,102,207
Team Member soft skills	\$5,756,038
Other Team Member training	\$7,478,458
Hospitality workforce training	\$2,908,385
Total investment	\$68,255,530



LOOKING FORWARD

We are committed to upholding the highest ethical standards and meeting or exceeding all applicable laws and regulations in the regions where we operate. This commitment includes steadfast work to protect human rights in our business, operations and supply chain. As we look forward in 2024 and beyond, we will continue to focus our prevention efforts in three core areas:

- **Team Members:** Team Members are one of our greatest assets. We will continue to review, refine and conduct workforce development initiatives and training on the critical issues of human trafficking and modern slavery.
- **Guests:** We are committed to respecting and promoting the human rights of all people who visit our integrated resorts and utilize our digital offerings. We will continue to review, refine and promote our efforts to ensure modern slavery and human trafficking activities do not take place on our properties or platforms.
- **Suppliers:** Our commitment to protecting human rights and ensuring integrity in all aspects of our operations extends to the vendors and suppliers with whom we do business. We will continue to review, refine and promote initiatives to ensure that our partners provide fair and safe conditions for all workers in our supply chain.

The Las Vegas Sands Board of Directors approved this Modern Slavery Statement for Sands and its subsidiaries on March 18, 2024.



ROBERT G. GOLDSTEIN
Chairman of the Board and Chief Executive Officer
Las Vegas Sands





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On the cover: Nelson's Column, The Londoner Macao