



# Appendix 2.22-1

## **Nassau County Legislature Comment Response Letter**

December 12, 2024

**VIA UPS OVERNIGHT DELIVERY**

The Honorable Howard J. Kopel, Presiding Officer  
and Members of the Nassau County Legislature  
Peter J. Schmitt Memorial Legislative Chamber  
1550 Franklin Avenue  
Mineola, New York 11501

Attn: Michael C. Pulitzer, Clerk of the Nassau County Legislature

**Re: Sands New York Integrated Resort**

Dear Presiding Officer Kopel and Honorable Members of the Nassau County Legislature:

We represent LVS NY Holdco 2, LLC (Sands) and have been requested to submit this correspondence, which provides salient information to address various comments regarding the potential for the proposed Integrated Resort to affect various quality-of-life and legal compliance issues, including increases in crime, human trafficking, money laundering and others.

As the Nassau County Legislature correctly indicated in the section of its Final Scope, entitled *Issues Considered in the Review of the Environmental Assessment Form and/or Raise during Scoping and Determined to be Neither Relevant Nor Environmentally Significant and the Reasons Why Those Issues Were Not Including in This Final Scope*, such issues are not appropriate for review pursuant to the implementing regulations of the New York State Environmental Quality Review Act at 6 NYCRR Part 617. In fact, The *SEQR Handbook* (NYSDEC, Fourth Edition, 2020) explains that:

*Some social factors may be considered arbitrary, discriminatory, or speculative, and consequently are inappropriate for inclusion in an EIS. Such factors may include, but are not limited to, potential for crime, drug problems, or psychological stress. These kinds of social concerns may be raised by the public during the comment period or hearing on an EIS. In such cases, they may be acknowledged, but given limited weight, when SEQR findings are developed during the agency's final decision making. (Page 114)*

The Final Scope specifically notes that while these issues are inappropriate for inclusion in a Draft Environmental Impact Statement (DEIS), the Nassau County Legislature would consider all comments relating to these factors in its deliberations regarding the lease for the Integrated Resort. Accordingly, on behalf of Sands, we are hereby submitting relevant information for the Legislature's consideration.

According to Sands' Code of Business Conduct & Ethics, Effective April 2023 (annexed hereto as Exhibit A),

*At Sands, we are committed to our core values of excellence in business performance, impeccable service, innovation, sustainability, and fairness and honesty in all that we do...The Code sets forth our guiding principles and explains how to translate those principles into our everyday work. We are committed to operating with integrity while maintaining a sharp focus on respecting our guests and Team Members, actively engaging with the communities we serve, and always doing business the right way.*

Relevant topics addressed in Code of Business Conduct & Ethics include: safety of properties; preventing discrimination and harassment; stopping human trafficking; protecting Guest and Team Member privacy; preventing bribery and corruption; preventing money laundering; complying with gaming laws and regulations; promoting responsible gaming; adhering to global trade laws; maintaining accurate books and records; treating vendors and suppliers fairly; and complying with securities trading laws, among many others.

In addition to the Code of Business Conduct & Ethics (Exhibit A), Sands has additional relevant policies, as set forth below.

#### Anti-Corruption Policy

Sands Anti-Corruption Policy, last dated November 2024 (annexed hereto as Exhibit B) specifically states:

*...[Sands and all its subsidiaries and affiliates] 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.*

The Foreign Corrupt Practices Act (FCPA) is the U.S. Anti-corruption law that serves as the basis for much of Sands' anti-corruption program. All persons who are covered by the Policy must comply with the letter and the spirit of the Policy and applicable anti-corruption laws. The requirements of the policy address a number of issues/actions, including: 1) the prohibition against bribing government officials (including measures regarding political contributions, provision of anything of value, charitable contributions, lobbying activities, comps, etc.); 2) prohibition against commercial bribes and kickbacks; and 3) prohibition against facilitation payments in all but the narrowest of circumstances.

### Human Trafficking Prevention Policy

Exhibit C, annexed hereto, contains Sands Human Trafficking Prevention Policy, last dated October 2024. Sands is “committed to integrity and social responsibility” and “refuses to tolerate human rights abuse in any facet of our business.” This includes “Human Trafficking in any form, including Sex Trafficking, Forced Labor, and Child Labor, in its operations and global supply chain.” This Policy aligns with international standards and laws in the jurisdictions in which Sands operates, including the U.N. Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, the Trafficking Victims Protection Act of 2000, as well as the Modern Slavery Act of 2015.

### 2023 Modern Slavery Statement

Sands’ 2023 Modern Slavery Statement (annexed hereto as Exhibit D), indicates that:

*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.*

The 2023 Modern Slavery Statement notes that Sands has adopted a Human Rights Statement that respects and supports:

*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.*

The 2023 Modern Slavery Statement is to be read and applied in conjunction with Sands’ other policies, including, but not limited to, the Code of Business Conduct & Ethics, the Human Trafficking Prevention Policy, the Supplier Code of Conduct and the Reporting and Non-Retaliation Policy.

With respect to the comments regarding alcohol use, Sands has procedures to assist casino employees in identifying whether a person is in a state of intoxication and to handling situations where a person appears intoxicated. While casino employees are not trained mental health professionals, they are trained to look for signs of intoxication, such as the smell of alcohol, lack of judgment, noticeable change in behavior, slurred speech, among others.

Sands also has specific protocols that are to be followed in dealing with intoxicated persons who are attempting to enter the casino or who are already within the casino. In either circumstance, the casino employee must inform a supervisor/manager, contact security personnel and, potentially, the Responsible Gambling Ambassador (RGA) within the casino. If a person attempting to enter the casino is assessed to be in a state of intoxication, that person will be refused entry into the casino by security officers. If a patron within the casino is assessed to be in a state

of intoxication, the casino employee (and security, if and as necessary) will immediately cease all gambling activity and service of alcohol. All casino employees are trained to refuse gaming activities to any patron who is in a state of intoxication, and all food and beverage personnel are trained to refuse entry to those who appear intoxicated and to refuse alcohol service to patrons already within the casino who appear intoxicated. These measures are designed to minimize the potential for intoxicated persons to enter the casino, and for those already in the casino from engaging in excessive levels of alcohol consumption.

### Criminal Activity

With respect to crime, Greenberg Traurig, LLP (“GT”) analyzed the crime rates of the closest Long Island casino to the proposed Integrated Resort, Jake’s 58 Long Island Hotel & Casino (“Jake’s 58”). Jake’s 58, located at 3653 Express Drive North, Islandia, has been fully operational since May 2017 and is located approximately 23.5 miles east of the proposed Integrated Resort. It provides 1,000 video lottery terminal (“VLT”) gaming machines to its patrons and is currently undergoing a \$210 million expansion to double the number of VLT gaming machines, as well as adding new restaurants and parking spaces.<sup>1</sup>

GT submitted a Freedom of Information Law (FOIL) request to the Suffolk County Police Department for all prosecuted cases from January 1, 2022, through March 21, 2024, where the location of the criminal act was Jake’s 58. A copy of the FOIL results is annexed hereto as Exhibit E.

Over the 27-month period set forth in the FOIL request, only fourteen (14) arrests occurred. Furthermore, on two separate occasions, the perpetrator was assigned two arrest numbers for crimes committed during the same incident.<sup>2</sup> Accordingly, there were only twelve (12) people arrested for incidents that occurred at Jake’s 58 during the 27-month period. Stated differently, an arrest occurred once every 10 weeks.

The types of crimes committed at Jake’s 58 over the 27-month period are generally considered “lower-level crimes” - ranging from violations (non-criminal offenses) to Class A Misdemeanors. Additionally, there were only two (2) arrests for violation of Vehicle and Traffic Law Section 1192 (driving while under the influence of alcohol or drugs). Please note, the FOIL results do not provide the criminal charge at time of arraignment (which may have been reduced by the Suffolk County District Attorney’s Office).

The FBI provides statistics for all crime committed in the United States. The FBI’s “Offenses Known to Law Enforcement” report reveals that in Suffolk County there were 16,053 criminal offenses known to law enforcement during the 2019 calendar year.<sup>3</sup> The 14 abovementioned arrests that occurred at Jake’s 58 represents 0.09% of all criminal offenses in Suffolk County known to law enforcement in 2019.

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<sup>1</sup> Long Island Business News, Groundbreaking for \$210M expansion project at Jake’s 58 (April 11, 2024) <https://libn.com/2024/04/11/groundbreaking-for-210m-expansion-project-at-jakes-58/> .

<sup>2</sup> Arrests on March 3, 2023 and October 7, 2023.

<sup>3</sup> Federal Bureau of Investigation, 2019 Crime in the United States, [https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/tables/table-10/table-10-state-cuts/new\\_york.xls](https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/tables/table-10/table-10-state-cuts/new_york.xls) .


During that same period, the FBI's report listed that in Nassau County, home of the proposed Integrated Resort, there were 10,869 criminal offenses known to law enforcement. If Jake's 58 was located in Nassau County, the 14 arrests would represent merely 0.13% of all Nassau County criminal offenses known to law enforcement in 2019.

Conclusion

Based on the foregoing and the annexed exhibits, Sands has a strict Code of Business Ethics and various policies relating to the safety of properties; preventing discrimination and harassment; preventing human trafficking, bribery and corruption, and money laundering; preventing and addressing intoxication; complying with gaming laws and regulations; promoting responsible gaming; adhering to global trade laws; maintaining accurate books and records; and complying with securities trading laws, among many others. Moreover, Sands has regular training programs for its employees. In addition, the data regarding crime and gaming facilities at Jake's 58 indicate that, contrary to various assertions made, these uses do not result in significant increases to the local crime rate.

Very truly yours,

**GREENBERG TRAUIG, LLP**

By:   
\_\_\_\_\_  
Daniel J. Baker

Enclosures

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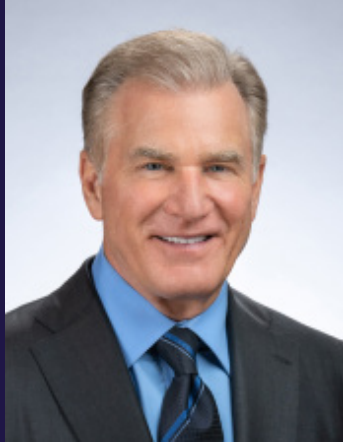
# **EXHIBIT A**



# CODE OF BUSINESS CONDUCT & ETHICS

Effective April 2023





## A MESSAGE FROM OUR CHAIRMAN

### Introduction to the Code of Conduct

At Sands, we are committed to our core values of excellence in business performance, impeccable service, innovation, sustainability, and fairness and honesty in all that we do. By living these values every day, we have built an enduring legacy as a global business leader, and we've made the regions in which we operate better places to live, work and visit.

In this regard, I am proud to introduce the 2023 edition of our Code of Business Conduct and Ethics. The Code sets forth our guiding principles and explains how to translate those principles into our everyday work. We are committed to operating with integrity while maintaining a sharp focus on respecting our guests and Team Members, actively engaging with the communities we serve, and always doing business the right way.

The past few years have been challenging for our company. We have all felt pressures as we worked our way through a period of uncertainty into a new era filled with hope, exciting opportunities, and high expectations. As we move forward, we want to ensure that all of our Team Members and business partners exemplify our commitment to behaving ethically and in accordance with the laws of the United States and all of the regions in which we operate. If difficult questions arise, make

no mistake: we always want you to choose to act with integrity, and we are committed to ensuring that you always feel empowered to do so.

Every Team Member has an obligation to read and understand this Code and to speak up if you have questions, or if you believe you have experienced conduct that might violate its principles. Only by making ethical choices—and by speaking up if you believe others have not—can we ensure that our culture of integrity, which we have built and cultivated for so many years, will be preserved.

As always, we remain committed to the highest standards of professional conduct in every way and every place we do business.

**ROBERT G. GOLDSTEIN**  
Chairman of the Board and  
Chief Executive Officer

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## DOING WHAT'S RIGHT FOR INDIVIDUALS, THE COMPANY, INVESTORS, & OUR COMMUNITY

### Doing Business the Right Way

At Sands, we believe in providing unmatched guest service. This concept runs through everything we do, from how we design our hotels to the extra effort our Team Members provide to a guest in need. But just as importantly, we always act with integrity, meeting our legal and ethical duties. In short, whatever we do, we do it the right way. This means in carrying out our mission to provide our guests with the very best experience, we keep four principles of ethical conduct in mind at all times:

#### 1. We respect individuals

Whether Team Members, guests, suppliers, or members of the community, we treat each individual with whom we come into contact with the utmost respect. We strive to make sure they are safe and free from discrimination or harassment.

#### 2. We do business ethically and legally

We follow the letter and the spirit of all laws the Company is obligated to follow. We are aware of our global obligations. We act with integrity in every action we take on behalf of the Company.

#### 3. We protect our Company and our investors

The continued growth of the Company benefits our investors and our Team Members. Our actions are designed to safeguard the assets and reputation of the Company.

#### 4. We enhance our communities

The Company has properties in locations around the globe. Our interactions with the communities in which we work provide opportunities to improve the world around us. Whether working with local governments, or making sure we act as stewards of the environment we live in, we look to make our communities better places.

Doing what is right is the most important job a Team Member has. While it can sometimes be tempting to disregard this idea in an effort to meet an executive's urgent request, get a job done quickly, or close a deal, this is not a risk we take. No guest, no contract, no deal is more important than the reputation and future of the Company.

### The Guiding Principles



We respect individuals



we protect our company and our investors



We do business ethically and legally



we enhance our communities

## We Follow the Code

This Code provides you with a high-level overview of the core principles that govern our way of doing business, as well as links to the more detailed policies and procedures our Team Members and other Covered Persons are expected to know and follow. This Code is intended to help all of us detect and prevent violations of law and corporate policy and to promote individual accountability.

The Code applies to all directors, officers – including our principal executive officer, principal financial officer, and principal accounting officer – Team Members, consultants, vendors, and agents of the Company, regardless of where they perform their work for the Company. All of these are referred to as “Covered Persons,” and when this code references “we” or “you” it includes all Covered Persons. When the Code talks about the Company, it includes Sands, and/or its affiliates, including Sands China Ltd. (“SCL”), Marina Bay Sands Pte. Ltd. (“MBS”), and/or their affiliates.

As you read the Code and related materials, keep in mind compliance and integrity are elements of each of our jobs and are essential parts of our commitment to leading in all aspects of our business. The Sands and SCL Boards

of Directors and MBS management have made clear that compliance is also a measurement of our performance and the Company has adopted a Clawback Policy, consistent with applicable law, to reinforce its importance. Doing the right thing at all times is a standard to which we must hold ourselves and each other.

As a public company and business operating under licenses obtained in the various jurisdictions in which we operate, we must be mindful of the many important laws and regulations governing our conduct. Compliance with both the letter and spirit of all laws, rules, and regulations applying to the Company’s business, including the requirements of any organization or entity regulating the Company, is critical to the Company’s reputation and continued success. You must respect and obey the laws of the cities, states, and countries in which we operate and avoid even the appearance of impropriety.

You are not expected to navigate these laws and expectations alone. The Company has numerous resources to provide guidance and a variety of ways to voice a concern, listed in the “Making Sure the Code Works” section of this document.

## Our Global Obligations

As an international business, the Company is impacted by the laws and business customs of the countries in which we operate. In some cases, the law of a particular country may appear to require us to take actions that may be contrary to this Code. If you believe a conflict exists between the Code and the laws of a particular country, you should bring the conflict to the attention of the Chief Compliance Officer for your region, the Global Chief Compliance Officer, or Legal.

In some countries, business practices are based on less stringent laws or different business expectations and customs. For business dealings in such countries, the Code should continue to be followed and any requests for variances should be directed to the Global Chief Compliance Officer.

## Your Responsibilities as a Team Member

We rely on each other to do the right thing. This means seeking help when you have a question or concern. As listed throughout this Code, there are many ways for you to seek guidance or report a concern – choose the way most comfortable for you.

Report violations or concerns. If you discover what you in good faith believe are actions in violation of this Code, or are actions of a questionable, fraudulent, or illegal nature, you must report the matter immediately in accordance with the Company’s **Reporting and Non-Retaliation Policy**. Making a report in good faith does not mean your suspicions have to be correct or proven. It just requires that you provide truthful and accurate information if you have a reasonable basis to believe the reportable behavior occurred or is going to occur. Reports made out of spite or those which intentionally include false information are not good faith reports. To the extent permitted by law, you may choose to remain anonymous in reporting any possible violation – a 24 hour/7 days a week Ethics Hotline is available for web and phone reports, available at [lvscethics.com](http://lvscethics.com) or 1.888.469.1536.

## Special Responsibilities for Leaders and Managers

Making sure we comply with the Code is the responsibility of every Team Member, but managers, supervisors, and our Company leaders have a special responsibility for ensuring the Code and Company policies are followed. Every manager and supervisor is responsible for communicating Company policies to their Team Members, including those dealing with legal and ethical behavior. Managers and supervisors are also responsible for maintaining a work environment where constructive, candid, and open discussion is encouraged and expected, without fear of retaliation. But most importantly, managers, supervisors, and Company leaders should be role models for their teams.

## We Do Not Tolerate Retaliation

The Company takes all good faith reports seriously. Retaliation against a Team Member making a good faith report or complaint, seeking advice or guidance about a matter under the Code, or cooperating with an investigation of a potential violation will NOT be tolerated under any circumstance. Any person involved in such retaliation violates the Code and is subject to discipline up to and including termination.

Retaliation can take many forms. It can include a manager reducing pay and benefits, denying promotion, or assignment to less desirable shifts. It can also be more subtle; treating someone differently simply because they filed a report or complaint is also retaliation.

## Example

John manages six Team Members in the Safety Department. One of them, Sarah, filed a report claiming that John had been passing certain equipment as certified for use even though a full inspection had not been completed. It turned out that John had gotten approval for this from his manager but did not tell his staff. After the report was resolved, John held his annual summer open house at his home. As in previous years, most of the guests were Team Members, including everyone in his department. However, this year he did not invite Sarah because of her complaint, even though she had been invited in the past.

### Q: IS THIS RETALIATION?

A: Yes. John’s party was held off-property and may have been personal in his mind. But because the guest list was primarily Team Members, and many of the attendees were there as co-workers, not personal friends, not inviting Sarah can be seen as treating her differently than her co-workers. As the only difference this year was Sarah’s report about John, a reasonable person could see this as an effort to retaliate against Sarah.

## PRINCIPLE 1

## RESPECT FOR INDIVIDUALS

We conduct our business in a way that shows respect for our Team Members and guests

## KEEPING OUR PROPERTIES SAFE

## Doing the Right Thing

**We operate in a way that ensures our Team Members' and guests' safety when on our property.**

## Why We Do It

Any time a Team Member or guest steps onto our property, they should feel the Company is doing all it can to keep them safe. We know they expect to be protected from harm while on our property and we work hard to meet these expectations. We care about our Team Members and want to ensure everyone has a safe and healthy working environment.

## How We Do It

- Maintaining and enforcing a Written Workplace Safety Program.
- Making the prevention of occupational accidents and illness a responsibility of every supervisor and manager.
- Adhering to an Environmental Responsibility Policy.
- Complying with all public health and environmental laws pertaining to our operations.
- Maintaining an open dialogue with our local communities on any hazards posed by our operations.
- Working with government authorities, industry groups, and the public to promote awareness of and develop appropriate responses to any hazards related to our operations.
- Providing state-of-the-art security for our properties.

## Learn More

- Team Member Handbook
- Written Workplace Safety Program
- Environmental Responsibility Policy
- Sands Project Protect

## What Can I Do?

If you see a safety hazard, report it to your supervisor right away. You may help prevent an accident or injury. If an unsafe condition persists, you can report it to the Compliance or Facilities Departments through any of the channels discussed at the end of this Code.

## PREVENTING DISCRIMINATION &amp; HARASSMENT

## Doing the Right Thing

**We are committed to providing a workplace free from discrimination and harassment.**

## Why We Do It

Sands seeks to foster a workplace where Team Members are treated fairly and are able to reach their full potential and contribute to the Company's success. Team Members should expect a workplace free from harassment and disrespectful conduct. Preventing discrimination and harassment is not only the right thing to do, it is good business as well. The productivity and morale of our Team Members suffer when they are subjected to unwelcome conduct in the workplace. All Team Members should be treated fairly and with respect and protected from all forms of harassment and discrimination.

Harassment is unwelcome or abusive conduct based on race, color, religion, sex, pregnancy, national origin, sexual orientation, gender identity, age, disability, or genetic information.

Discrimination is the unjust or prejudicial treatment of an individual based on race, color, religion, sex, pregnancy, national origin, sexual orientation, gender identity, age, disability, or genetic information.

## How We Do It

- Promulgating and enforcing our Preventing Discrimination and Harassment Policy.
- Requiring all Team Members to complete a sexual harassment awareness training program.
- Training our Team Members to identify and prevent workplace discrimination and harassment.
- Having a zero-tolerance approach to harassment and discrimination within our workplace.
- Basing all employment decisions regarding Team Members on merit, qualifications, and job-related characteristics except as required under local law or local government policy or expectations.
- Providing Team Members multiple channels to report discrimination or harassment.
- Ensuring that Team Members who make reports in good faith regarding discrimination, harassment, or workplace culture in general are not retaliated against or suffer any disadvantage for doing so.

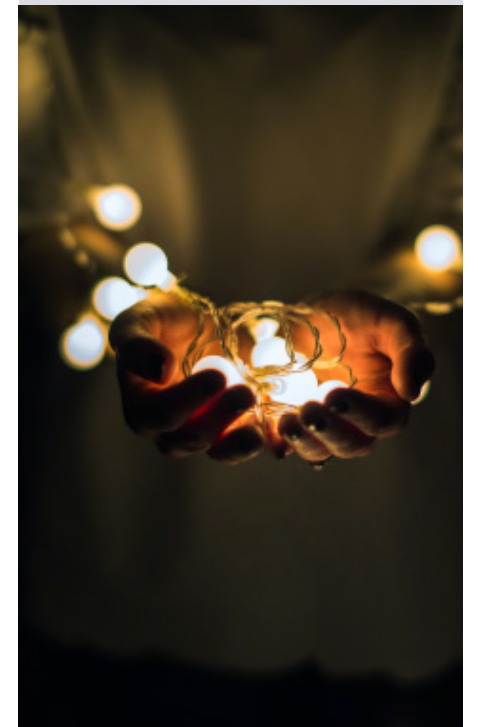
## Learn More

- Preventing Discrimination and Harassment Policy
- Reporting and Non-Retaliation Policy
- Sands Project Protect
- U.S. Equal Employment Opportunity Commission: <https://www.eeoc.gov>
- Macao Labor Department: <https://www.dsal.gov.mo/en/standard/index.html>

## Q&amp;A

**Q: IS SEXUAL HARASSMENT LIMITED TO UNWANTED PHYSICAL CONTACT?**

A: No! Sexual harassment may consist of verbal, visual, or physical conduct of a sexual nature that is unwelcome or makes someone feel uncomfortable. It can take many forms, including sexual advances or unwelcome demands for dates; sexually oriented jokes, pictures, or text messages; or the display of sexually suggestive images or pornography.



## DIVERSITY, EQUITY, AND INCLUSION

### Doing the Right Thing

**We are committed to creating a culture of diversity, inclusion, and belonging for our Team Members.**

### Why We Do It

At Sands, we believe our work culture is enhanced and our business is most successful when we embrace the unique experiences and diverse perspectives of our Team Members. This means showing an understanding of and respect for all Team Members' gender identity, race, ethnicity, sexual orientation, disability, religion, and age, as well as their unique cultural backgrounds, experiences, opinions, and ideas.

Our properties serve guests from around the world, and having Team Members who reflect this diversity allows us to better serve our guests. It also creates a more successful work environment for Team Members.

### How We Do It

- Recruiting, training, and developing individuals of all experiences, ages, cultural and racial backgrounds, and religious beliefs.
- Valuing and showing respect for the unique cultural backgrounds and diverse experiences of our Team Members.
- Maintaining membership in and support of groups and programs that encourage and promote various diversity, equity and inclusion initiatives.

### Learn More

- Sands Cares: <https://www.sands.com/responsibility/communities/>
- Team Member Handbook
- Sands Project Protect
- Contact Human Resources



## IDENTIFYING AND PREVENTING HUMAN TRAFFICKING AND FORCED LABOR

### Doing the Right Thing

**We work to prevent all forms of human trafficking and forced labor at our properties and in our supply chains.**

### Why We Do It

Human trafficking is a crime involving the buying, selling, recruiting, transporting, transferring, harboring, or receiving of persons for sexual services or other exploitative purposes, including forced labor. The hospitality industry is not immune to this problem. Indeed, traffickers often take advantage of the privacy and anonymity hotels offer. Sex trafficking in hotel settings harms the victims and threatens the safety and well-being of guests, Team Members, and the community. Likewise, forced labor threatens supply chain stability and does economic harm and reputational damage to the Company. We proactively work to stop the exploitation of vulnerable people and remain vigilant to the risk of human trafficking and forced labor in our business.

### How We Do It

- Promulgating and enforcing our Human Trafficking Prevention Policy.
- Taking a zero-tolerance approach to human trafficking and forced labor.
- Requiring suppliers to comply with our Human Trafficking Prevention Policy and Supplier Code of Conduct.
- Ensuring our global procurement team communicates these policies to suppliers.
- Training our Team Members to identify and respond appropriately to instances of sex trafficking on our properties.
- Engaging with local law enforcement for specialized training.
- Partnering with local government and non-profit organizations on anti-trafficking efforts.
- Conducting third party audits of suppliers to evaluate whether workers are treated fairly, and engaging with suppliers on remediation where issues are identified.
- Prohibiting the use of recruiters that charge employees fees (unless mandatory by local law) or impose inappropriate conditions of hire or employment.

### Learn More

- Human Trafficking Prevention Policy
- Sands Project Protect
- Supplier Code of Conduct

### 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.

## PROTECTING GUEST & TEAM MEMBER PRIVACY

### Doing the Right Thing

We are committed to protecting the privacy and personal information of our guests and Team Members.

### Why We Do It

In the course of our business, we collect and use information from our guests and Team Members to provide world-class products, services, and experiences. Guests and Team Members trust the Company to safeguard and protect this information and we are committed to doing so. In addition, many of the places where we operate have laws surrounding data privacy and protection, and it is our responsibility to adhere to those laws.

### How We Do It

- Issuing a Global Privacy Policy and training all Team Members to take reasonable measures to prevent unauthorized access to and disclosure of our guests' personal information.
- Disciplining Team Members who violate the privacy of our guests and/or Team Members.
- Securing information maintained in electronic form on systems protected by best-in-class industry security measures.

### Learn More

- Global Privacy Policy: <https://www.sands.com/privacy-policy/>
- Singapore: MBS Personal Data Protection Policy Manual
- Macao: Personal Data Guidelines

### Q&A

**Q: I HAVE SOME PAPERS THAT INCLUDE A LOT OF TEAM MEMBER PERSONAL DATA AND SALARY DETAILS THAT I NO LONGER NEED. CAN I JUST THROW THESE PAPERS AWAY IN THE GENERAL RECYCLING BIN?**

A: No! Records containing personal data need to be disposed of securely (i.e., by shredding or using a secure document disposal facility).



## PRINCIPLE 2

# DOING BUSINESS ETHICALLY & LEGALLY

In everything we do, we follow the law and act in a responsible and ethical manner

## COMPLYING WITH GAMING LAWS & REGULATIONS

### Doing the Right Thing

**We comply with gaming laws and regulations in every jurisdiction in which we conduct business.**

### Why We Do It

Gaming is a highly regulated business. All of our properties operate pursuant to specially granted licenses and/or concessions. Accordingly, we must be cognizant of the laws, rules, and regulations governing our gaming activities. We also have a responsibility to ensure our gaming activity is fair to our patrons.

### How We Do It

- Complying with all rules and regulations set forth by gaming regulators in the regions in which we operate.
- Maintaining a successful compliance program focusing on gaming regulatory matters.
- Creating gaming-related policies, procedures, and internal controls, and publicizing them where appropriate.
- Cooperating with regulators in the jurisdictions in which we operate.
- Training Team Members on casino-related operations and the rules applying to them.

### Learn More

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MBSCompliance@MarinaBaySands.com
- Macao: +853 811 82273  
Compliance\_VML@sands.com.mo

## PROMOTING RESPONSIBLE GAMING

### Doing the Right Thing

**We are a leader in making responsible gaming a top priority.**

### Why We Do It

We take responsible gaming very seriously. Our goal is to remain the industry leader in responsible gaming and to ensure that the necessary community resources are available both for guests who seek assistance and the organizations that help provide care and support.

### How We Do It

- Ensuring that we not only comply with, but well exceed all responsible gaming government regulations.
- Training Team Members how to recognize and respond to guests who may exhibit signs of or seek help for problematic gaming behavior. Establishing a fun and safe environment that promotes responsible gaming in our resorts and raising awareness of the potential effects associated with problem gambling.
- Developing robust programs and initiatives that provide information to increase guest awareness of responsible gaming and the support that is available.

- Partnering with leading experts to develop a specialized Responsible Gaming Ambassador program to train Team Members how to respond to our guests' needs and refer them to appropriate support services.
- Working with local governments and service providers in every community in which we operate.

### Learn More

- Sands:  
<https://www.sands.com/responsibility/people/>
- Marina Bay Sands:  
<https://www.marinabaysands.com/company-information/responsible-gambling.html>
- Sands China Ltd.:  
<https://www.sandschina.com/community-affairs/responsible-gaming.html>
- Sands Project Protect

### How Can I Help?

- Familiarize yourself with all Responsible Gaming program materials and services and know how to direct guests to resources addressing the issue.
- Know when and how to call upon a Responsible Gaming Ambassador to assist a guest in need.
- Become a Responsible Gaming Ambassador by attending the annual training.

## PREVENTING BRIBERY & CORRUPTION

### Doing the Right Thing

**Neither we nor anyone acting on our behalf will ever pay, offer to pay, receive, or solicit any bribe, kickback, or other payment, whether cash or anything of value, in order to improperly do business, gain a business advantage, or secure a license or permit.**

### Why We Do It

In every jurisdiction where we operate, the law prohibits paying a bribe or kickback to government officials and, in most cases, to an employee of a private company. When someone demands a bribe in connection with their job, they violate their duty to act in the best interest of the public or their employer. The person paying the bribe is undermining fair competition and, if discovered, they endanger their company's business and reputation. For example, as a casino operator, we could lose our license to operate if we were found to have paid or offered to pay a bribe. The law imposes severe criminal and civil penalties on both the companies involved and individual employees responsible for the misconduct.

### How We Do It

- Enforcing a strict Anti-Corruption Policy that prohibits any bribes or kickbacks, whether to a Government Official or anyone else with whom we do business.
- Refusing to pay "grease" or make "facilitation" payments to speed up Government Officials in carrying out their duties.
- Limiting the gifts and entertainment we may accept from or give to other Covered Persons or entities with whom we do business.
- Training Team Members on our anti-corruption program.



- Reviewing how we interact with Government Officials and Politically Exposed Persons on our property, including making sure we extend complimentaries only in accordance with our written policies.
- Complying with our Charitable Contributions and Sponsorship Policy requiring management and Compliance Department approval.
- Conducting extensive due diligence on third parties with whom we do business.
- Requiring our suppliers to act legally and ethically in accordance with our Supplier Code of Conduct.

### Learn More

- Anti-Corruption Policy
- Charitable Contributions and Sponsorship Policy
- Third Party Travel, Gifts & Entertainment Policy
- Conflict of Interest Policy
- Politically Exposed Person Standard Operating Procedure
- Complimentary Policy
- Contracting Overview Policy
- Supplier Code of Conduct

### Key Concepts

- **Bribery is prohibited:** No Covered Person or anyone acting on behalf of the Company may ever pay, promise, offer to pay, or approve payment of money or anything of value to any Government Official, directly or indirectly, in order to improperly influence that official to act or not act in their official capacity.
- **"Anything of value":** Includes cash, cash equivalents (such as gift cards), accommodations, meals, theater tickets, employment or internships, travel, and even such things as charitable donations or sponsorships that may enhance an official's reputation.
- **Politically Exposed Person ("PEP"):** An individual (including an immediate family member or a close associate) who is or has been entrusted with any prominent public function in the United States, or in any other country, or an international organization (like the United Nations or FIFA).
- **Government Official:** Includes government officials in the United States (whether at the federal, state, or local level) and non-U.S. government officials (including employees of state-owned enterprises, political parties, and international organizations). It also includes almost all employees of state-owned enterprises.

## ENGAGING IN FAIR COMPETITION

### Doing the Right Thing

**We are committed to winning business fairly and through free and open competition in the marketplace.**

### Why We Do It

There are a variety of laws we operate under that protect competition in the marketplace and protect consumers. These laws vary throughout the world, but they always prohibit companies from sharing information and engaging in other conduct that could reduce competition. Violations carry serious civil and criminal penalties in some jurisdictions, as well as the risk of private civil actions. We do not need to seek an improper advantage; we outperform our competition legally and ethically.

### How We Do It

- Promulgating, enforcing, and training relevant Team Members on our Competition Policy.
- Never discussing, or entering into agreements, with competitors about pricing, allocating customers, costs, or any other topics that could limit competition and harm consumers.
- Respecting competitive bidding processes when seeking new or continuing business.
- Using only legal methods to gather information about our competitors.

### Learn More

- Competition Policy
- Information Acceptable Use Policy



### Doing the Right Thing in Action

If you are in a situation where a competitor starts discussing these prohibited topics, politely excuse yourself from the conversation and leave the room if possible. Inform

the Compliance Department of what happened as soon as possible so it can document the action you took to avoid the conversation.

## PREVENTING MONEY LAUNDERING

### Doing the Right Thing

**We prevent money laundering and terrorist financing activities by complying with all laws and regulations and enforcing a strict Anti-Money Laundering (“AML”) Program.**

### Why We Do It

Money laundering has significant negative economic, security, and social consequences. Money laundering takes several forms, including: (1) hiding the proceeds of illegal activities, (2) making the sources of illegal funds appear legitimate, and (3) spending “dirty money,” such as by gambling or shopping. It also includes terrorist financing, the use of funds or assets to support those engaged in terrorist activities, directly or indirectly. A variety of criminal enterprises, including those dealing dangerous drugs or engaging in human trafficking, rely on money laundering to process their illegal profits. At Sands, we assist our governments in combating money laundering and terrorist financing. We focus on preventing, detecting, and reporting suspicious activities and transactions that may take place on our properties.

### How We Do It

- Adopting a Global AML policy.
- Ensuring that we strictly adhere to all applicable AML and Counter Terrorist Financing laws and regulations.
- Ensuring we are following a strict program of internal controls to prevent and detect money laundering.
- Providing AML training tailored to appropriate Team Members’ duties and responsibilities.
- Promoting and maintaining an open line of communication between departments.

- Knowing our guests and understanding their sources of funds.
- Timely filing all required reports and partnering with local law enforcement and government agencies.
- Recognizing indicators (“red flags”) of suspicious activities and transactions.
- Stopping the play of any guest we believe is involved in money laundering activity.

### What Does Money Laundering Look Like?

Every case is unique. One example would be a guest who arrives at a gaming table with large amounts of small bills derived from drug dealing. The guest converts the cash into chips, plays for only a few minutes, and bets only a very small portion of their stack. The guest then heads to the cage where they ask for their money in larger denominations. They are paid and leave the premises. The guest can now claim the cash as “winnings” and although they may have to pay taxes on it, they can show it as “legitimate” income.

### What Are the Red Flags?

- Examples of indicators of potentially suspicious activities and transactions you may encounter include:
- A guest’s reluctance to proceed with a transaction after being told it must be reported to the government.
  - A guest refusing to provide identification or other identifying information.
  - Large or frequent cash transactions with minimal gaming activity.

- A guest providing insufficient or suspicious information, such as conflicting identification.
- Coordination between guests (e.g., chip sharing) without justification or allowing other guests to play under their membership card.

### Learn More

- Global AML Policy
- Internal Controls:
  - Marina Bay Sands
  - Sands China Limited

### Key Definitions

- **Currency Transaction Report (“CTR”/“LSTR”):** A CTR (called an LSTR in Macao) is a report we must file with the government when a person or their agent conducts a single or multiple currency transactions in excess of a designated amount in one day.
- **Suspicious Activity or Transactions Report (“SAR”/“STR”):** An SAR or STR is a report we must file with the government concerning suspicious or potentially suspicious activities and transactions that take place at or involve our properties.
- **Chip Walk:** A patron may have “walked with chips” when they appear to have left the casino without redeeming the chips in their possession and did not return within a reasonable time frame.
- **Structuring:** The act of breaking down large transactions into smaller transactions in an attempt to avoid the filing of a CTR.

## TREATING VENDORS & SUPPLIERS FAIRLY

### Doing the Right Thing

**We maintain objective and fair business relationships with suppliers.**

### Why We Do It

Our guests expect the best, and we expect to get the best through objective and fair relationships with our vendors and suppliers. We engage with ethical and trustworthy suppliers who will provide the high-quality goods and services our guests expect and deserve. We select partners who not only provide the best value for our Company but safeguard our reputation for excellence.

### How We Do It

- Maintaining a transparent, open, and fair purchasing and procurement process governed by our Contracting Overview and Procurement Policies.
- Reviewing each supplier and vendor to make sure they are operating according to the legal and ethical standards we expect.
- Avoiding conflicts of interest in our procurement process so decisions are made using objective and independent judgment.

### Learn More

- Contracting Overview Policy
- Procurement policies
- Third Party Due Diligence Standard Operating Procedure
- Sourcing Procedures
- Conflict of Interest Policy

### Key Information

The Company uses Ariba, a purchasing, contract, and payment management software system to ensure products and services are procured and paid for pursuant to our policies and procedures.



## ADHERING TO GLOBAL TRADE LAWS

### Doing the Right Thing

**We follow all applicable laws and regulations that govern global trade and ensure compliance with all trade sanctions programs in the countries where we do business.**

### Why We Do It

The Company conducts business all over the world and is subject to various trade laws. These laws prohibit or restrict our ability to engage in business activities with certain countries, territories, entities, and individuals; failure to follow these restrictions can give rise to serious penalties. It is our responsibility to be familiar and comply with all applicable laws, regulations, and restrictions involving our trade activities.

### How We Do It

- Adhering to the Company's U.S. Economic Sanctions Compliance Commitment and Policy Statement.
- Training our Team Members on the Company's sanctions compliance policies and procedures.
- Maintaining accurate records of all transactions and audits for at least a five-year period.
- Screening all guests and third parties involved in transactions.
- Being familiar with and identifying "warning flags" described in the Company's U.S. Economic Sanctions Compliance Commitment and Policy Statement.
- Refusing to participate in international boycotts.
- Following regulations regarding the import or export of specified goods, services, software, or technologies.

### Learn More

- U.S. Economic Sanctions Compliance Commitment and Policy Statement

### Key Concepts

- **U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC"):** OFAC is responsible for administering and enforcing economic sanctions programs, primarily against countries, territories, entities, and individuals.
- **Country-Based Sanctions:** Country-based sanctions prohibit any and all unlicensed transactions or other dealings involving the sanctioned countries/territories, entities organized under their laws, their governments, their residents, and in some cases nationals, of such countries/territories.
- **Specially Designated Nationals ("SDN"):** An SDN is an individual or an entity specifically designated by OFAC as a threat to U.S. national security and other U.S. foreign policy goals, with whom U.S. persons cannot deal absent OFAC authorization and whose property they must block (freeze).



PRINCIPLE 3

# PROTECTING OUR COMPANY & INVESTORS

We have a responsibility to grow and protect the Company while enhancing shareholder value

## PROTECTING COMPANY RESOURCES

### Doing the Right Thing

**We protect Company resources by using them only for legitimate business purposes.**

### Why We Do It

The Company knows you need the right tools to do your job the right way. In some cases, those tools may literally be a hammer or a screwdriver; in other cases, it could be a computer, a copier, or the linens we use in guest suites. Our job is to use those resources honestly and efficiently for legitimate business purposes. If our resources are wasted or unavailable, our business will be disrupted.

### How We Do It

- Requiring Team Members to sign and abide by the Team Member Handbook.
- Not using Company resources for personal purposes.
- Immediately reporting the loss or theft of Company property.
- Receiving Compliance Department approval for use of a Company asset for political purposes.

### Learn More

- Team Member Handbook

### Examples of Improper Use

Borrowing tools to use on a home project; reselling used equipment for personal profit; using a Company vehicle to drive for a ride-sharing service; making personal charges on a Company credit card, even if you intend to pay it back; spending Company time working on a side business.



## MAINTAINING ACCURATE BOOKS & RECORDS

### Doing the Right Thing

**We implement an effective system of internal controls to ensure our internal books and records are accurate and complete.**

### Why We Do It

The trust of the public, regulators, and our investors is paramount. If we lose that trust, we undermine the Company's ability to operate. Part of maintaining that trust is making sure we have a thorough and complete system of internal controls. There can be no question about the accuracy of Company books and records or the integrity of the processes the Company employs. Our records must fully and accurately reflect what actually happens each and every time we engage in a business transaction. In addition, the laws under which the Company operates have very specific requirements with regard to our books and records.

### How We Do It

As a company, we follow three key principles:

- Maintain, and require all Team Members to comply with, our internal controls.
- Ensure that our internal books and records are prepared with the highest standard of care and accurately reflect our financial transactions.
- Provide reports and documents to the public and our regulators that are complete, accurate, timely, and understandable.

In addition, each individual Team Member is responsible for making sure:

- All transactions are transparent and accurate. Do not establish, for any purpose, an unauthorized, undisclosed, or unrecorded fund or asset. Do not make any attempt to hide or disguise the true nature or cost of any transaction. Do not falsify, omit, alter, or conceal any facts in Company business records.

- Any spending of Company funds must be within your authority under the Approval and Authorization Guidelines and Approval and Authorization Policy.
- Transactions with customers and third parties are structured or recorded in a manner consistent with the Company's policies and procedures for engaging, contracting, and paying third parties.
- All third parties undergo our screening and due diligence process, and contracts with them are tracked, typically via Ariba, the automated system that helps us manage our relationships.

### Learn More

- Approval and Authorization Policy
- Contracting Overview Policy
- Financial Reporting Controls & Procedures
- Accounting Policies
- Complimentary Policy



### Key Information

When the Code refers to "books and records" or "business records," it is not limited to the formal accounting ledgers kept by the Company. It includes any document, whether hard copy or electronic, that is created or used in the course of accounting for the Company's operations. This includes emails, spreadsheets, presentations, memos, invoices, purchase orders, and expense reports, as just a few examples. All of these records must be accurate and truthful. You are accountable for the accuracy of the records you create or maintain.

## AVOIDING CONFLICTS OF INTEREST

### Doing the Right Thing

**We work diligently to identify and prevent situations in which Covered Persons' interests conflict or appear to conflict with the best interests of the Company.**

### Why We Do It

Our investors and fellow Team Members expect that in everything we do at work we act in the best interests of Sands. We bring fair and unbiased independent judgment to our work so we can maximize shareholder value and help grow the Company. A conflict of interest exists where a Covered Person has a personal or private interest that does, could, or appears to interfere with the Covered Person's ability to do a job fairly and ethically, or that compromises his or her position of trust with the Company.

### How We Do It

- Following the detailed Conflict of Interest Policy that requires us to disclose and resolve all conflicts.
- Avoiding any personal or private interest that does, could, or appears to influence our independent judgment or conflicts with the Company's interests.
- Providing written notice to the Company of any actual, perceived, or potential conflicts of interests, as soon as the Covered Person becomes aware of the situation by:
  - Completing the Disclosure Form attached to the Conflict of Interest Policy, or
  - Using the reporting tool in ServiceNow (our electronic portal).
- Prioritizing advancement of the Company's legitimate business interests.

### Key Concepts

- Do not accept gifts or entertainment that could unduly influence our business decisions in order to ensure that we award business solely on the merits and at the best terms and conditions for the Company.
- Do not engage in secondary employment or have an outside business interest that conflicts with your responsibilities to, or competes with, the Company.
- Ensure that your personal relationships, whether family, friends, or otherwise, do not improperly influence your decisions at work.
- Make sure your activities outside of work do not interfere with your job responsibilities, reflect poorly on the Company, or create a conflict with the Company's business goals. Requisite approvals must be sought, for example, for certain management levels to serve on a board of directors or executive level of a public or private company or a non-profit or industry board or association.
- Do not use Company information, property, or authority in pursuing outside financial interests.
- Do not use your position or Company resources (1) to take opportunities away from Sands, (2) for personal gain, or (3) to compete against the Company.

### Learn More

- Conflict of Interest Policy
- Anti-Corruption Policy
- Third Party Travel, Gifts & Entertainment Policy
- Complimentary Policy
- Team Member Travel and Expense Policy
- Competition Policy
- Team Member Handbook



### Examples

**Actual Conflict:** Jane in the Horticulture Department is overseeing a bid for a new flower supplier. Her husband owns a flower company and submits a bid for the job. Even though the husband's bid is higher cost, Jane selects him for the contract without disclosing their relationship. Jane violated the policy both by failing to disclose the relationship and by letting the relationship influence the award of the contract.

**Potential Conflict:** Sarah works in IT. For almost 10 years she worked for Acme Corp., which is now bidding on an IT contract with Sands. Sarah is not directly involved in the contracting process, but she will work closely with whomever is selected and may be asked for performance feedback. Sarah raises this issue with her supervisor and they agree she will not be consulted about vendor selection and any performance reviews of the selected vendor will be screened by the supervisor. Sarah and her supervisor have appropriately resolved this potential conflict.

**Perceived Conflict:** Fred manages a team of about 50 Team Members. At a social event, Fred hears that John, who is on Fred's team, is selling a vintage car. Fred is a collector. Fred asks John about the car and John says he has it listed for \$15,000, but will give it to Fred for \$12,000 because he wants to "sell it quickly." Should Fred accept? Probably not. Other Team Members may view John's discount as an attempt to gain favor with the boss. Even if \$12,000 is a reasonable price, the apparent discount gives the appearance of an inappropriate gift to a supervisor.

## SAFEGUARDING COMPANY CONFIDENTIAL INFORMATION & INTELLECTUAL PROPERTY

### Doing the Right Thing

**We protect the Company's confidential and proprietary information by not disclosing it to any unauthorized persons.**

### Why We Do It

Sands has invested significant time and resources into developing its business practices and intellectual property. Unauthorized disclosure of this information could destroy its value to the Company and give an unfair advantage to others. Each of us must diligently protect the Company's confidential business and technical information as we do its tangible property.

### How We Do It

- Requiring Team Members to abide by the Confidentiality Agreement or Data Retention and Classification Policy in the Team Member Handbook.

- Prohibiting disclosure of confidential information to third parties without written authorization.
- Only disseminating information to and sharing access to documents or systems with Team Members specifically authorized for access.
- Protecting information entrusted to us by third parties and business partners as if it was Company information.
- Prohibiting Team Members and business partners from using Company intellectual property for personal or outside business ventures.
- Requiring the Sands' CEO's approval for any grant of naming rights to a Company venue.

### Learn More

- Team Member Handbook
- Data Retention and Classification Policy

### Key Definitions

- **Intellectual Property:** Any work of invention that is developed as a result of creativity or diligence and which can be protected under law, including copyrights, trademarks, patents, trade secrets and other know-how. For example, marketing materials, ads, and game designs or processes.
- **Confidential Information:** All non-public or proprietary information owned by or pertaining to the Company or its executives, vendors, and guests that was learned as a result of your relationship with the Company. This includes, for example, customer lists, financial records, and Team Member records.

## RESPECTING TRADE SECRETS OF OTHERS

### Doing the Right Thing

**We follow the golden rule, respecting the trade secrets and intellectual property of our competitors as if they were our own.**

### Why We Do It

We are committed to competing fairly and ethically. We expect our competitors to respect our intellectual property, trade secrets, and proprietary information. Accordingly, we need to respect their intellectual property as well. This is not only the right thing to do but is required by law. Competitors' intellectual property may be protected by trademark, copyright, and patent laws. Their trade secrets and proprietary information may also be protected under various fair competition statutes.

### How We Do It

- Respecting the confidential information and intellectual property, such as trademarks, logos, designs, copyrights, trade secrets, and patents, of our competitors and other third parties.
- Using only lawful means to obtain information about our competitors.
- Never publicly commenting on a competitor's products or services in an inaccurate or untruthful manner.

### Learn More

- Contact the Legal and/or Compliance Departments

### Q&A

**Q: I PREVIOUSLY WORKED FOR A COMPETITOR OF SANDS. IN MY JOB, I HAD ACCESS TO CONFIDENTIAL INFORMATION ABOUT MY EMPLOYER'S FUTURE DEVELOPMENT STRATEGY. CAN I SHARE THIS INFORMATION WITH MY NEW TEAM AT SANDS?**

**A:** No! We have an obligation to our competitors and you have an obligation to your former employer to protect their confidential information from unauthorized access or disclosure. As such, any attempt to share, profit, or gain from the confidential information of others would not only be unethical but also a breach of our Code of Conduct.

## COMPLYING WITH SECURITIES TRADING LAWS

### Doing the Right Thing

**We comply with all securities trading laws and do not allow our Team Members to use inside information to trade in the markets.**

### Why We Do It

Securities laws aim to ensure the buying and selling of publicly traded securities – such as our Company’s stock – is done fairly. Everyone buying or selling stock should have access to the same information. Maintaining the confidence of the investing public is crucial to maintaining shareholder value. Trading on inside information and tipping are both unethical and illegal; violations carry serious penalties. In addition to strict legal compliance, we strive to avoid even the appearance of impropriety and to protect the Company’s reputation for honesty and integrity.

### How We Do It

As a Company we:

- Promulgate the Securities Trading Policy and the Data Retention and Classification Policy.
- Require that new hires receive and acknowledge the Securities Trading Policy.
- Provide annual training for all Team Members on the Securities Trading Policy.

Covered Persons and their Immediate Family Members are prohibited from:

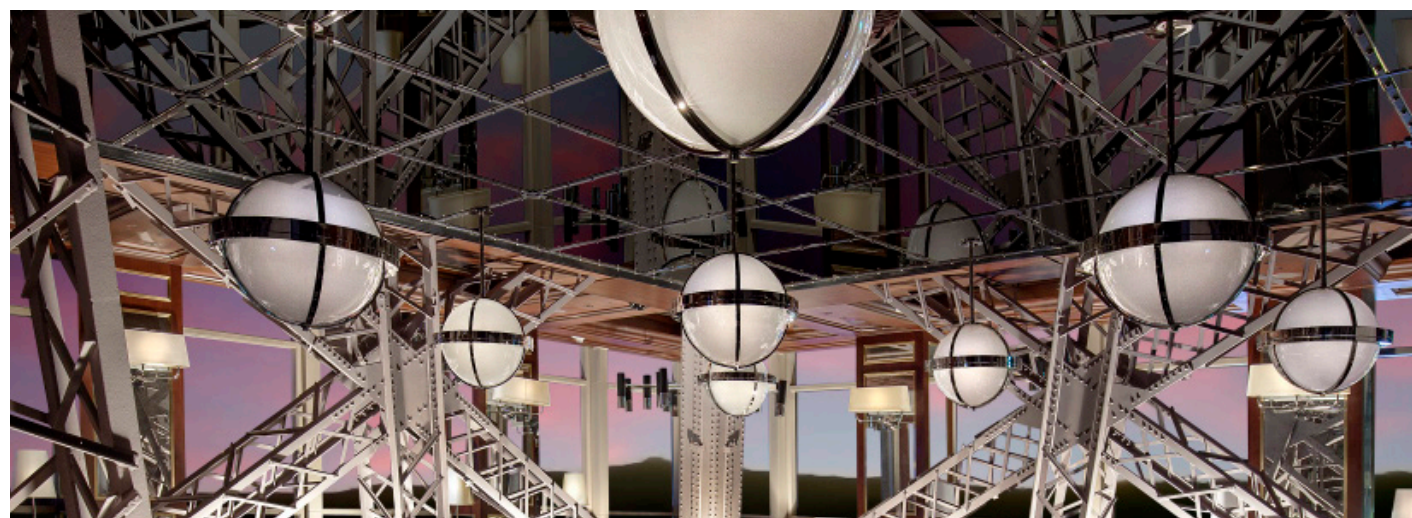
- Trading in Company stock while in possession of Material Non-Public (“Inside”) Information.
- Tipping.
- Trading Company stock outside the Company’s trading window if they are on the Company’s restricted trading list and are required to pre-clear any transaction.

### Learn More

- Securities Trading Policy (Code for SCL)
- Information Acceptable Use Policy

### Key Definitions

- **Material Non-Public Information:** Information that a reasonable investor would consider important in a decision to buy, hold, or sell a stock. For example, you learn that the Company is going to report higher than expected earnings next week. You cannot trade in Company stock until after the earnings are reported. Likewise, if you find out that Sands is about to sign a big contract with a vendor, you cannot buy stock in the vendor until after the contract is announced.
- **Immediate Family Member:** Spouse, minor children, or anyone else living in your household.
- **Tipping:** Providing Material Non-Public Information to a third party not authorized to have the information (even if you don’t know whether the third party intends to trade based on the information).



## PROPERLY COMMUNICATING OUTSIDE THE COMPANY

### Doing the Right Thing

**We speak with one voice.**

### Why We Do It

Our Company is frequently in the news. It may be a routine earnings report, a celebrity attending an event, or an unusual occurrence at our property. How we respond to media requests can impact how the Company is perceived by the public, investors, and regulators. Therefore, Team Members should not discuss confidential Company business with members of the press, investors, or market analysts without authorization.

### How We Do It

Directing all requests to talk about Company business from members of the press, investors, or market analysts to our Corporate Communications and/or our Investor Relations office.

### Direct Media Inquiries to

- U.S. and Corporate: 702.923.9142
- Macao: +853 811 72143
- Singapore: mediarelations@marinabaysands.com

## SAFELY USING SOCIAL MEDIA

### Doing the Right Thing

**We balance our Team Members’ rights to express themselves with the obligation to properly represent the Company.**

### Why We Do It

Social media is all around us today. It gives individuals the power to connect with one another and express their views to a wide audience. While the Company respects individuals’ right to express themselves in social media, we all need to be aware that when we do so we may be seen as a representative of the Company. We have a responsibility to protect the Company’s confidential information and reputation when we use social media.

### How We Do It

- Recognizing that social media posts are still governed by our confidentiality rules.
- Distinguishing between authorized business communications and personal communications.
- Requiring Team Members who endorse our Company on social media to identify themselves clearly and conspicuously as Team Members of the Company.
- Not allowing social media to interfere with doing your job.

### Learn More

- If you have any questions, ask your supervisor or Human Resources
- Team Member Handbook

### Q&A

**Q: A CELEBRITY WAS ON PROPERTY AND I WAS ABLE TO SNAP A FEW QUICK PICTURES. CAN I POST THESE TO MY SOCIAL MEDIA ACCOUNT?**

**A:** No! As discussed elsewhere, we protect our guests’ privacy and do not make unauthorized communications about Company business. Posting the photos would violate both principles.

Important note: In some countries where we operate, the law allows Team Members to freely communicate with one another and third parties about terms of employment and working conditions. Nothing in this Code is meant to limit that right, but you must still adhere to rules around confidentiality and privacy.



PRINCIPLE 4

# ENHANCING OUR COMMUNITIES

We are part of a larger community and look for ways to positively impact the world around us

## PARTICIPATING IN CIVIC & GOVERNMENT ACTIVITIES

### Doing the Right Thing

We ethically engage in civic activities to advocate on behalf of the Company and encourage Team Members to individually participate in civic activities.

### Why We Do It

Constructively engaging in civic activities in every region in which we operate helps the Company achieve its goals and contributes to public discourse on important issues. Likewise, when Team Members responsibly participate in the political process or civic activities in a personal capacity, they also promote open and vibrant societies. Adhering to all applicable laws and high ethical standards in conducting such activities – as a Company and as individuals – ensures fair and inclusive political processes.

### How We Do It

- As a Company we:
  - Comply with all applicable political campaign finance and election laws.

- Prohibit Team Members from directly or indirectly making political contributions on behalf of the Company or with Company funds unless it is legal and prior approval is received.
- Never exert improper influence on any government agency or representative to gain a favorable outcome for the Company.
- Conduct due diligence on charitable contributions or sponsorships made to civic events or organizations to ensure such contributions are proper and legitimate.

As individual Team Members we:

- Speak and act solely in a personal capacity and not on behalf of the Company.
- Disclose to the Company any political engagement that may pose an actual or potential conflict of interest.

### Learn More

- Anti-Corruption Policy
- Charitable Contributions and Sponsorship Policy
- Conflict of Interest Policy
- Third Party Travel, Gifts & Entertainment Policy

### Q&A

**Q: LAST SATURDAY, I ATTENDED A POLITICAL RALLY WHERE I WAS INTERVIEWED BY A LOCAL NEWS STATION. WHEN ASKED TO INTRODUCE MYSELF, I TOLD THE REPORTER THAT I AM A TEAM MEMBER AT SANDS. WAS IT OK TO MENTION THAT?**

**A:** Because you are engaging in the political process as a private citizen, and not a representative of Sands, refrain from associating yourself with the Company. If a third party identifies you as a Team Member, make clear that your statements and actions are your own and do not represent those of the Company.

## CONDUCTING BUSINESS SUSTAINABLY

### Doing the Right Thing

**We are committed to protecting the environment by practicing sustainable development and conserving natural resources.**

### Why We Do It

Our responsibility to the planet is as important to us as our commitment to the comfort and well-being of our guests and Team Members. Our global sustainability strategy is designed to help minimize our environmental impact, and it reflects our vision to lead the way in sustainable building development and resort operations.

### How We Do It

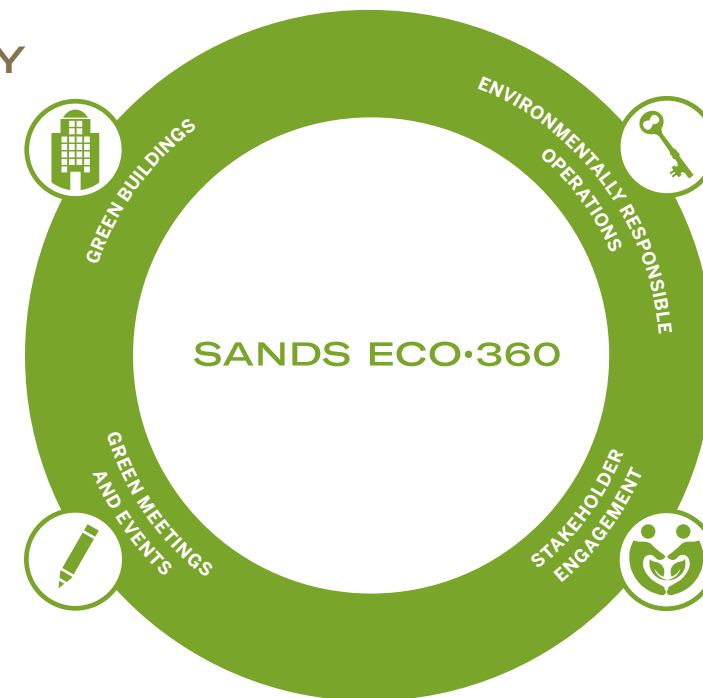
- Promulgating policies to promote environmental responsibility and sustainable procurement.
- Developing Sands ECO360, a holistic global sustainability program which addresses key issues including energy, water, and waste.
- Using a formal environmental management system to identify the impacts of our operations, establish priorities, set performance goals, and continuously monitor our Sands ECO360 program.
- Producing an annual progress report sharing our sustainability efforts and achievements.
- Conducting environmental risk and opportunity assessments and developing mitigation plans.

- Promoting responsible business conduct that upholds environmental regulatory requirements and demonstrates industry-leading practices where formal legal standards are not in place.
- Establishing strategic relationships with various organizations to create transformational change in the regions in which we operate.
- Using third-party rating standards and certifications to measure our sustainability performance and improve our methods.
- Providing Team Members and other stakeholders with opportunities to learn about and contribute to our sustainability efforts.

### Learn More

- Environmental Responsibility Policy
- Sustainable Procurement Policy
- Sustainable Development Standards
- Sands ECO360 Report

### ECO360 STRATEGY PILLARS



### How to Make a Difference

- **Conserving:** Use less water, paper, and electricity by turning off lights, setting computers to “sleep” mode, printing double-sided or not at all, using reusable mugs and water bottles, and using hand dryers instead of paper towels.
- **Engaging and Learning:** Participate in Sands ECO360 activities such as assembling hygiene kits with repurposed amenities from hotel rooms, planting trees, the Clean Plate Challenge, building community gardens, property tours, and sustainability education sessions.

## MAKING SURE THE CODE WORKS

### The Global Compliance Department

The Global Compliance Department, under the management of the Company's Global Chief Compliance Officer, has primary responsibility for this Code of Conduct. This includes issuing it, keeping it updated, answering questions about it, and investigating and remediating any alleged violations of the Code. The Compliance Department works with many other departments of the Company and will make sure that in any matter related to this Code the most appropriate resources are involved.

In addition to all other ways in which you can report allegations of misconduct, illegal activity, or violations of the Code, or ask questions about the Code and the laws under which the Company operates, you can always contact the Compliance Department.

### Other Resources in the Company

Human Resources partners closely with the Compliance Department in administering, and resolving issues that arise under, the Code. It is responsible for matters that relate to the terms and conditions of Team Members' employment. It can be contacted with respect to any issue and is likely to be the most appropriate place to initially raise issues related to discrimination and harassment, as well as workplace treatment and conditions.

The Company's Operational Compliance Committees at the property level help ensure the Code is properly implemented and administered. These committees report to the Board of Directors through the Global Chief Compliance Officer and the Board's Compliance Committee.

The Board of Directors' Compliance Committee provides oversight of the Company's compliance program with respect to (a) compliance with the laws and regulations applicable to the Company's business, including gaming laws; and (b) compliance with the Code, its Anti-Corruption Policy, its Anti-Money Laundering Policy, and its Reporting and Non-Retaliation Policy.

The Board of Directors' Audit Committee provides oversight of the Company's internal controls and financial matters.

### Seeking Guidance

As we have seen, there are many ways for you to seek guidance or report a concern – choose the way that is most comfortable for you. Key contacts are listed at the end of this Code, but you can always use the Ethics Hotline to seek help:

- Website: [www.lvscethics.com](http://www.lvscethics.com)
- Phone:
  - United States: 888.469.1536
  - Singapore: SingTel 800-011-1111 or StarHub 800-001-0001, followed by 888-418-1029 at prompt
  - Macao: 0800-111, followed by 888-418-1029
- For additional Ethics Hotline phone numbers in other countries, visit [www.lvscethics.com](http://www.lvscethics.com) or use the QR code below.



### How We Investigate Misconduct

Reports of alleged misconduct come into the Company in a variety of ways, including the Ethics Hotline, direct emails, and through management reporting. The Company takes all good faith reports seriously and protects those making them from retaliation. All reports of alleged violations of this Code will be assigned to an appropriate investigator to conduct a prompt, fair, and thorough investigation.

All information obtained during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, and in accordance with applicable law. Similarly, we ask Team Members involved in the investigation to keep all information confidential to allow a fair and impartial investigation to proceed. Nothing in this Code prohibits you from reporting possible violations of federal law or regulation to any applicable governmental agency or entity.

If, at the conclusion of the investigation, it is determined a violation of this Code has occurred, the Company will take prompt remedial action commensurate with the severity of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violation of the policy at issue. When consistent with law and our confidentiality obligations, we will make every effort to advise the reporting party about the closure of the matter.

### Disciplinary Action

The Code is very important to the Company. Failure to comply with the standards outlined herein and all policies referred to herein will result in disciplinary action, up to and including termination, where permitted by law. Some violations of the Code or other Company policy are serious enough to warrant dismissal in the first instance.

Disciplinary action will be taken against:

- Any Team Member who violates the Code or pertinent law.
- Any Team Member who deliberately withholds relevant information concerning a violation of the Code or pertinent law.
- The Team Member's manager or supervisor to the extent that the circumstances of the violation reflect participation in the violation, or lack of diligence.
- Any Team Member who retaliates, directly or indirectly, or encourages others to do so, against a Team Member who reports a Code, policy, or law violation.
- Any Team Member who knowingly falsely accuses another Team Member of a Code, policy, or law violation.

In addition, the Board of Directors of the Company has adopted a Clawback Policy which requires a Team Member to return a bonus to the Company where the bonus was achieved as a result of the Team Member's misconduct.

## Your Obligation to Help

If you discover what you in good faith believe are actions in violation of this Code, or are of a questionable, fraudulent, or illegal nature, you must report the matter immediately. You will be protected from retaliation in any form or manner. You have a duty to cooperate truthfully and fully in the investigation of any alleged violation of the Code. In addition, a Team Member may be subject to disciplinary action, including termination of employment, if the Team Member fails to cooperate in an investigation, deliberately provides false or misleading (including diverting, misdirecting, or offering incomplete) information during an investigation, or deliberately conceals or destroys records or anything in order to hinder the investigation.

## Government Investigations

As a regulated entity, we may occasionally be asked to respond to a government inquiry or investigation. In any interactions with the government we will act lawfully and provide information truthfully and to the best of our knowledge and ability. To ensure that we adhere to these rules and to protect the Company's interests, you must seek advice from the Legal or Compliance Departments before responding to a non-routine request for information directed at the Company from a government or regulatory agency. If you are contacted by a government investigator, we ask that you contact the Global Chief Compliance Officer or General Counsel for your group.

You must never under any circumstance:

- Destroy or alter any Company document or record, including emails and other electronic records, in anticipation of a request for the document or record by a governmental agency or court.

- Lie or make false or misleading statements to any governmental investigator.
- Attempt to persuade any Covered Person, or any other person, to provide false or misleading information to a governmental investigator, to destroy or alter any document or record, or to fail to fully and truthfully cooperate with a governmental inquiry.

Nothing in this Code should be interpreted as prohibiting or discouraging you from testifying, participating, or otherwise assisting in any state, federal, judicial, or legislative proceeding or inquiry.

## Waivers and Amendments

Any specific waiver of the Code for the principal executive officer, principal financial officer, principal accounting officer (or persons performing similar functions), other executive officers (Senior Vice President and above), or member of the Board of Directors will be made only by the Company's Audit Committee and will be promptly disclosed as required by law. Any specific waiver of the Code for any other Covered Person will be made by the Global Chief Compliance Officer. All such waivers shall be reported by the Global Chief Compliance Officer to the Compliance Committee and the Audit Committee at their next regularly scheduled meeting. Any amendment of the Code will be made only by the Company's Board of Directors and will be promptly disclosed as required by law or regulation.

## This Code Is Not a Contract

This Code is not an employment contract. Adherence to the standards of the Code, however, is a condition of continued employment at the Company. This Code does not give you rights of any kind, and may be changed by the Company at any time without notice. Unless governed by a collective bargaining agreement, written employment contract, or you are employed outside the United States in a country where the applicable law may be different, employment with the Company is "at will," which means that you or the Company may terminate your employment for any reason or no reason, with or without notice, at any time. This at-will employment relationship may not be modified except in a written agreement signed by the Team Member and an authorized representative of the Company.

## Acknowledgment

Each Team Member is required to certify his or her understanding of and compliance with the terms of this Code and related policies by electronically acknowledging that he or she has received a copy of the Code. Be sure you have taken the time to read and understand the Code before signing the electronic acknowledgment, which is accessible in your online training package. Other Covered Persons should read and sign the attached form and submit it to your contact at the Company. If, in good faith, you believe you cannot sign the electronic acknowledgment, you must advise your supervisor or the Chief Compliance Officer for your region of your reasons for not signing and provide the information requested on the Good Faith Objection Form, which can also be accessed in your online training package.

## WHO TO CONTACT

### Compliance

#### Corporate/U.S.

compliance@sands.com  
or 702.923.9960

#### Singapore

MBSCompliance@MarinaBaySands.com  
or +65 6688 3384

#### Macao

Compliance\_VML@sands.com.mo  
or +853811 82273

### Legal

#### Corporate/U.S.

702.449.9311

#### Marina Bay Sands

+65 6688 1218

#### Sands China Ltd.

+853 811 82366

### Human Resources

#### Corporate/U.S.

702.923.9228

#### Marina Bay Sands

+65 6688 1611

#### Sands China Ltd.

+853 811 86146 / + 853 811 86147

### Ethics Hotline

**Website:** [www.lvscethics.com](http://www.lvscethics.com)

#### Phone:

**United States** 888.469.1536

**Singapore** SingTel 800-011-1111 or StarHub 800-001-0001, followed by 888-418-1029 at prompt

**Macao** 0800-111 followed by 888-418-1029 at prompt

**For additional Ethics Hotline phone numbers in other countries, visit [www.lvscethics.com](http://www.lvscethics.com) or use the QR code below.**





# **EXHIBIT B**

# LVS Global Policy

<b>Policy Title:</b>	<b>Anti-Corruption Policy</b>		
<b>Division:</b>	Global	<b>Department:</b>	Compliance
<b>Date Created:</b>	March 2017	<b>Approved by:</b>	Patrick Dumont, President & Chief Operating Officer, Zac Hudson, EVP - Global General Counsel, Erik Sandstedt, Senior Vice President & Global Chief Compliance Officer
<b>Last Review:</b>	November 2024		

## 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 Standard Operating Procedure \(SOP\)](#).

### 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

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**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

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**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:** Actual or potential casino customers (whether or not registered in a player program) receiving a Comp associated with gaming activity.

**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

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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](#).

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3. 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 the Central Repository for Policies.

United States, Fortis, and Sands Digital Services companies
<a href="#">Policies &amp; Procedures (NAVEX PolicyTech)</a>
Macao & Singapore
<a href="#">Policies &amp; Procedures (NAVEX PolicyTech)</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 6688 3384

- **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.)
800 492 2726 (Singapore)
0800-111 Followed by 888-418-1029 (Macao)
For additional phone numbers and dialing instructions from other jurisdictions, visit <a href="http://www.lvscethics.com">www.lvscethics.com</a> .


### More information:

- [Anti-Corruption SOP](#)
- [Approval and Authorization Policy](#)
- [Aviation Screening Procedure](#)
- [Charitable Contributions and Sponsorship Policy](#)
- [Complimentary Policy](#)
- [Conflict of Interest \(English\)](#)
- [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 \(English\)](#)

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## 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

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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.**

# **EXHIBIT C**

# LVS Global Policy

<b>Policy Title:</b>	<b>Human Trafficking Prevention Policy</b>		
<b>Division:</b>	Global	<b>Department:</b>	Compliance
<b>Date Created:</b>	July 2017	<b>Approved by:</b>	Patrick Dumont, President & Chief Operating Officer
<b>Last Reviewed:</b>	October 2024		

## GLOBAL POLICY

### 1. POLICY STATEMENT

Guided by our values and beliefs, 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 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 Labor, and Child Labor, in its 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, but not limited to:

- The U.N. Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (“UNTOC”)
- The Trafficking Victims Protection Act of 2000 (TVPA)
- Macau Law 6/2008 on Combatting the Crime of Human Trafficking
- The Singapore Prevention of Human Trafficking Act
- Modern Slavery Act 2015

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.

### 3. DEFINITIONS

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

- A. 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

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children and/or interferes with their schooling. It deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development<sup>1</sup>.

**B. Commercial Sex** is the exchange of money or goods for sexual services.

**C. Covered Entities** includes LVS agents, contractors, subcontractors, and suppliers.

**D. Facilitation** includes but is not limited to:

- Assisting in the concealment of human trafficking activity;
- Coordinating human trafficking activity on behalf of oneself or another person;
- Providing contact information for human traffickers.

**E. 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. Forced labor also includes debt bondage, whereby the victim may at first agree to work for an individual and pay an initial “work placement” fee, but which fee, instead of being reduced over time, is, through fraud or deception, increased to the point the victim is in effect coerced into indefinite forced labor, involuntary servitude or slavery or, in some instances, to having to perform commercial sex acts.

**F. Human Trafficking** or “trafficking in persons” is an umbrella term for the act of recruiting, harboring, transporting, providing, or obtaining a person for exploitation through the use of threat, force, fraud, deception or coercion. Other terms employed interchangeably include involuntary servitude, slavery, and debt bondage. Human Trafficking includes Sex Trafficking, Forced Labor, and Child Labor, as defined in this section.

**G. 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 and regardless of consent<sup>2</sup>.

#### 4. APPLICATION AND RESPONSIBILITIES

This Policy applies to all LVS businesses, Team Members and Covered Entities when acting within the scope of their employment or contract with LVS.

**Company Team Members** must not engage in nor aid and abet any form of Human Trafficking and must report any violations of this Policy through the means of reporting listed at the end of this Policy or any means as set forth in the Reporting and Non-Retaliation Policy.

**LVS Senior Management**, in addition to the above responsibilities covering all Team Members, is further responsible for promoting awareness and understanding of this Policy and all related SOPs.

The Company’s **agents, contractors, subcontractors, and suppliers worldwide** are required to abide by the Company’s Supplier Code of Conduct as well as make assurances and warranties regarding their compliance with international standards and the Human Trafficking laws of the relevant jurisdictions when acting within their scope of employment or contract with LVS.

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<sup>1</sup> <http://www.ilo.org/ippec/facts/lang--en/index.htm>

<sup>2</sup> For more detailed discussion of Modern Slavery related terms, see <https://www.state.gov/what-is-modern-slavery/>

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## 5. REQUIREMENTS OF THE POLICY

### A. Human Trafficking Prevention Generally

LVS will neither tolerate nor condone Human Trafficking—in any form—on our properties, during Company sponsored travel or by any Team Member or Covered Entity in the operation or support of our business.

To that end, LVS requires its businesses, Team Members and Covered Entities to:

- i. Not engage in, support, facilitate or tolerate any form of Human Trafficking;
- ii. Not facilitate or procure Commercial Sex whether on or off a LVS property, including in jurisdictions where Commercial Sex is legal;
- iii. 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;
- iv. Not engage in, or support the use of Child Labor, and comply with all applicable child labor laws;
- v. Not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports, work visas or driver's licenses;
- vi. 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;
- vii. Provide or arrange dormitory housing that meets or exceeds the health and safety regulations issued by the host country's government;
- viii. Comply with all applicable labor laws, including those governing wages, benefits, and working hours;
- ix. Not charge employees recruitment or placement fees unless in strict accordance with applicable laws;
- x. Not use recruiters that do not comply with applicable labor laws of the country in which the recruiting takes place;
- xi. Provide return transportation or pay for the cost of return transportation upon the end of employment (if required by law or contract).

### B. Reporting and Non - Retaliation

Reporting under this Policy is governed by the Company's Reporting and Non-Retaliation Policy.

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**C. Violations**

- i. LVS has a zero-tolerance policy in relation to any of its Team Members who engage in, support, facilitate, 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.
- ii. If a Covered Entity is found to be violation of this Policy by engaging in any of the prohibited activities contained herein, LVS reserves the right to terminate its business relationship with the Covered Entity or work with the Covered Entity to implement corrective action to remedy non-conformance, depending on the nature and severity of the violation.

**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.

United States, Fortis and Sands Digital Services
<a href="#">Policies and Procedures (NAVEX PolicyTech)</a>
Macao & Singapore
<a href="#">Policies and Procedures (NAVEX PolicyTech)</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 6688 3384

### ✓ 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.)
800-492-2726 (Singapore)
0800-111 Followed by 888-418-1029 (Macao)
For additional phone numbers and dialing instructions from other jurisdictions, visit <a href="http://www.lvscethics.com">www.lvscethics.com</a>


### More Information:

- ✓ Reporting and Non-Retaliation Policy
- ✓ Supplier Code of Conduct
- ✓ Code of Business Conduct & Ethics

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# **EXHIBIT D**



# 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](http://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

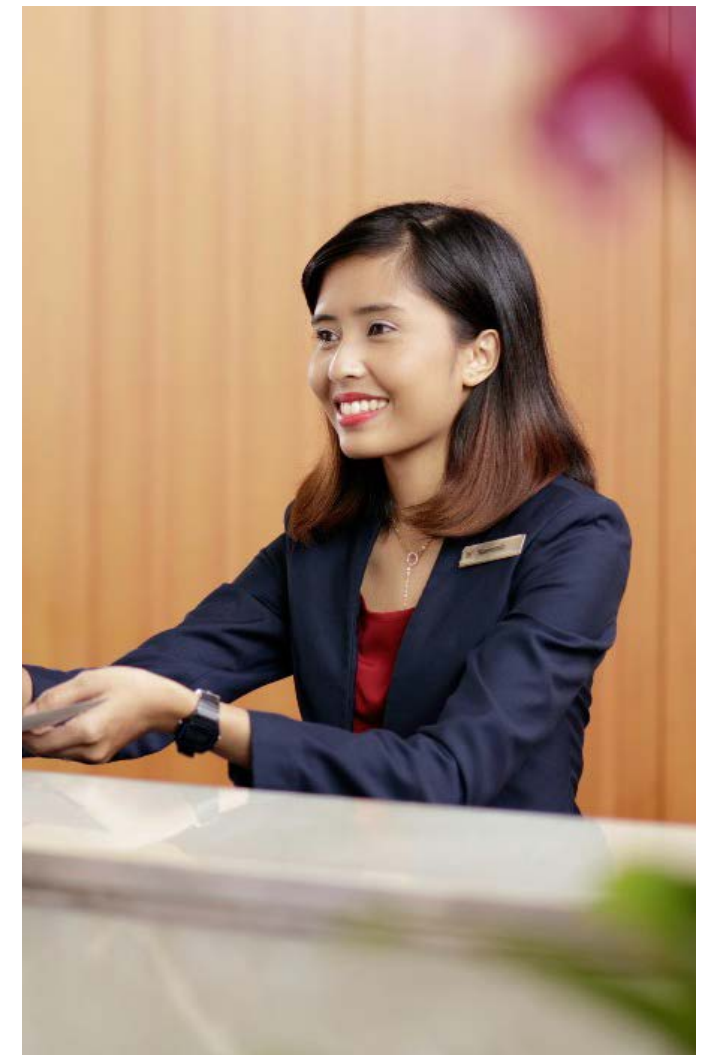
We maintain and enforce a strict Reporting and Non-Retaliation Policy. This policy requires all covered persons to report any actual or suspected violation of the Code, company policies, and applicable laws and regulations. The policy makes reporting mandatory and strictly prohibits any form of retaliation 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%
<b>Total</b>	<b>36,007</b>	<b>98%</b>

### Specialized Counter-Human Trafficking Training

	Total
Number of Team Members trained	2,614
<b>Total training hours</b>	<b>4,752</b>

### 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%
<b>Total</b>	<b>39,967</b>	<b>98%</b>

### 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
<b>Total investment</b>	<b>\$68,255,530</b>



## 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





**Corporate Headquarters**

5420 S. Durango Dr.  
Las Vegas, NV 89113  
702.923.9000  
sands.com

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

# **EXHIBIT E**

# SCPD FOIL Request

CC Number :

Application Date : 3/21/2024 3:48:25 PM

Request Printed :

Name : SNIPAS, ERIC

Address : 900 STEWART AVE, SUITE 505  
GARDEN CITY, NY 11530  
Phone : 516699608  
EMail : ERIK.SNIPAS@GTLAW.COM

Complainant :

Victim : , DOB :

Date of Occurrence : 1/1/1900

Loc of Occurrence :

Client Represented :

Business Info :

Report Type : Other

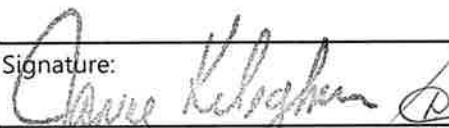
Other : ALL PROSECUTED CASES FROM 1/1/22-PRESENT AT  
3635 EXPRESS DR. NO. ISLANDIA, JAKES 58 CASINO.  
CRIMINAL COMPLAINTS, INDICTMENT, & DISPOSITION.

Mail Report/Record To :

Request Status : Money Due : 3.50 Please mail payment to : SCPD 30 Yaphank Ave. Yaphank, NY 11980

Disposition : Approved With Redactions

Additional Info : DIPOSITIONS MUST BE OBTAINED FROM SUFFOLK COUNTY FIRST DISTRICT COURT AND  
RIVERHEAD COUNTY COURT. AG

Signature: 	Title : Freedom of Information Officer	Date: 3/21/24
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YOU HAVE THE RIGHT TO APPEAL A DENIAL OF THIS APPLICATION IN WRITING TO THE OFFICE OF THE COUNTY ATTORNEY WITHIN 30 (THIRTY) DAYS OF THE DENIAL. INFORMATION AS TO THE PERSON TO CONTACT IS SHOWN BELOW. THE CONTACTED PERSON MUST RESPOND TO YOU IN WRITING WITHIN 10 (TEN) BUSINESS DAYS OF RECEIPT OF YOUR APPEAL.

SUFFOLK COUNTY ATTORNEY : H. LEE DENNISON BUILDING  
100 VETERANS MEMORIAL HIGHWAY  
P.O. BOX 6100  
HAUPPAUGE, N.Y. 11788

3/21/2024 4:15:48 PM



**REASONS FOR REDACTIONS AND/OR DENIAL OF ACCESS TO RECORDS  
SUFFOLK COUNTY POLICE DEPARTMENT**

**PDCS-5414-1a**

Document(s) withheld (Describe) \_\_\_\_\_

Document(s) withheld pursuant to the following sections of the Public Officers Law:

- 87 2(a) Records specifically exempted from disclosure by state or federal statute: \_\_\_\_\_
  
- 87 2(b) Disclosure would constitute an unwarranted invasion of personal privacy
- 87 2(e) Records are compiled for law enforcement purposes and, if disclosed, would;
  - i. interfere with law enforcement investigations or judicial proceedings;
  - ii. deprive a person of a right to a fair trial or impartial adjudication;
  - iii. identify a confidential source or disclose confidential information relating to a criminal investigation; or
  - iv. reveal criminal investigative techniques or procedures, except routine techniques and procedures.
- 87 2(f) Disclosure would endanger the life or safety of a person or persons.
- 87 2(g) Records are interagency or intra-agency materials which are not:
  - i. factual or statistical tabulations or data;
  - ii. instructions to staff that affect the public; or
  - iii. final agency policy or determinations.
- Other \_\_\_\_\_

Redactions made on documents pursuant to the following section(s) of the Public Officers Law:

- 87 2(a) Records specifically exempted from disclosure by state or federal statute: \_\_\_\_\_
  
- 87 2(b) Disclosure would constitute an unwarranted invasion of personal privacy
- 87 2(e) Records are compiled for law enforcement purposes and, if disclosed, would;
  - i. interfere with law enforcement investigations or judicial proceedings;
  - ii. deprive a person of a right to a fair trial or impartial adjudication;
  - iii. identify a confidential source or disclose confidential information relating to a criminal investigation; or
  - iv. reveal criminal investigative techniques or procedures, except routine techniques and procedures.
- 87 2(f) Disclosure would endanger the life or safety of a person or persons.
- 87 2(g) Records are interagency or intra-agency materials which are not:
  - i. factual or statistical tabulations or data;
  - ii. instructions to staff that affect the public; or
  - iii. final agency policy or determinations.
- Other \_\_\_\_\_

CC: 22-0178783/SPD ARREST: 009385-22 PIN: 776220



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: CAPOLONGO, MICHAEL P

ARREST	DATE OF ARREST	TIME OF ARREST	ARREST TYPE			LOCATION OF ARREST			<input checked="" type="checkbox"/> INSIDE ( ) OUTSIDE	
	06/23/22	1440	SIGHT (SUMMARY)			727 VETERANS MEMORIAL HIGHWAY, SMITHTOWN				
	INCIDENT LOCATION:						OCURRED:	DATE: 03/26/22	TO DATE:	
	3635 EXPRESS DRIVE NORTH ISLANDIA, ISLIP						<input checked="" type="checkbox"/> ON			
							<input type="checkbox"/> BETWEEN	TIME: 0517	TIME:	
ARRESTING OFFICER:			PID #	SHIELD	RANK	COMMAND				
MAIO, MICHAEL P			40079	1684	DET	3216				
FINGER PRINTED:		PHOTOGRAPHED:		WEAPON (DESCRIBE)						
<input checked="" type="checkbox"/> YES ( ) NO		<input checked="" type="checkbox"/> YES ( ) NO								
CT	LAW	ART	SUB	CLASS	DEG	CAT	DESCRIPTION	ATT. COMP.		
001	PL	155.30	01	E	4	F	GR LAR 4: VALUE PROPERTY >\$1000	X		
LAST NAME			FIRST	MI	NICKNAME / ALIAS			DATE OF BIRTH		
CAPOLONGO			MICHAEL	P				05/11/1983		
ADDRESS			CITY	STATE	ZIP	NYSID#				
94 SOUTH 5TH STREET			BETHPAGE	NY	11714	02459798H				



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DRIVE NORTH, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT MARCH 26, 2022, AT APPROXIMATELY 5:17 A.M., WITH INTENT TO DEPRIVE ANOTHER PERSON OR TO APPROPRIATE THE SAME TO HIMSELF OR TO A THIRD PERSON, WRONGFULLY TOOK, OBTAINED, OR WITHHELD SUCH PROPERTY, HAVING A VALUE OF MORE THAN ONE-THOUSAND DOLLARS; IN THAT, THE DEFENDANT DID TAKE TWO JAKE'S 58 LIMITED VOUCHERS WITH A VALUE OF \$2,116.17 THAT WERE ISSUED TO THE VICTIM. THIS ARREST IS BASED IN PART ON THE ATTACHED SIGNED STATEMENT OF THE VICTIM, DATED APRIL 9, 2022, ON THE ATTACHED SIGNED STATEMENT OF THE WITNESS, TIM TURNER, DATED MAY 16, 2022 AND ALSO ON YOUR DEPONENT, WHO REVIEWED THE VIDEO AND IS ABLE TO IDENTIFY THE SUBJECT IN THE VIDEO. THIS ARREST IS FURTHER BASED ON THE ORAL ADMISSIONS OF THE DEFENDANT, WHO DID STATE TO YOUR DEPONENT, IN SUM AND SUBSTANCE, BUT NOT LIMITED TO "I TOOK THE VOUCHERS, THEY WERE MINE, I GAVE HER THE MONEY TO PLAY WITH."

CERTIFIED ✓  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME MAIO, MICHAEL P	RANK DET	SHIELD 1684	COMMAND 3216	PCT 04	SECTOR 402
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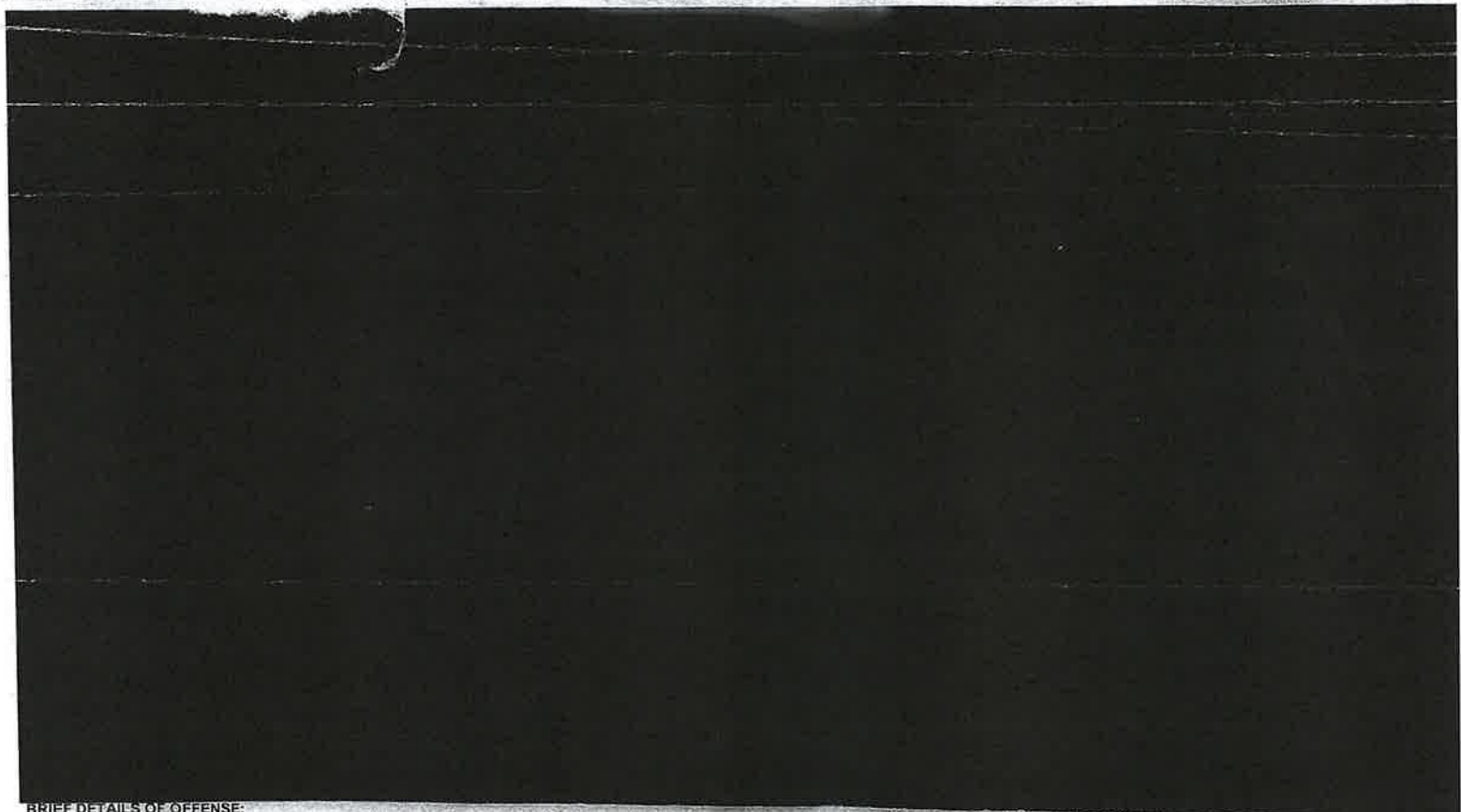
CC: 22-0374225/SPD ARREST: 009957-22 PIN: 408692



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: CASTELLI, ERIC S

DATE OF ARREST 07/02/22		TIME OF ARREST 1317		ARREST TYPE SIGHT (SUMMARY)		LOCATION OF ARREST 3635 EXPRESS DR N, ISLANDIA				<input checked="" type="checkbox"/> INSIDE ( ) OUTSIDE	
INCIDENT LOCATION: 3635 EXPRESS DR N ISLANDIA, ISLIP						OCCURRED: <input checked="" type="checkbox"/> ON ( ) BETWEEN		DATE: 07/02/22		TO DATE: TIME: 1306	
ARRESTING OFFICER: DEVORAK, JAMES M				PID # 41360		SHIELD 7079		RANK PO		COMMAND 0420	
[REDACTED]				WEAPON (DESCRIBE)							
CT 001	LAW PL	ART 190.23	SUB	CLASS B	DEG 0	CAT M	DESCRIPTION FALSE PERSONATION				ATT. COMP. X
LAST NAME CASTELLI			FIRST ERIC		MI S		NICKNAME / ALIAS CASTELLI ANTHONY			DATE OF BIRTH 12/01/1981	
ADDRESS 319 MARINERS WAY			CITY COPAIGUE		STATE NY		ZIP 11726		NYSID# 01125293J		[REDACTED]



BRIEF DETAILS OF OFFENSE:  
 THE DEFENDANT, AT 3635 EXPRESS DR N, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT JULY 1, 2022, AT APPROXIMATELY 1:06 P.M., AFTER BEING INFORMED OF THE CONSEQUENCES OF SUCH ACT, KNOWINGLY MISREPRESENTED HIS OR HER ACTUAL NAME, DATE OF BIRTH OR ADDRESS TO A POLICE OFFICER OR PEACE OFFICER WITH INTENT TO PREVENT SUCH POLICE OFFICER OR PEACE OFFICER FROM ASCERTAINING SUCH INFORMATION; IN THAT [REDACTED]

CERTIFIED ✓  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME DEVORAK, JAMES M						RANK PO	SHIELD 7079	COMMAND 0420	PCT 04	SECTOR 417
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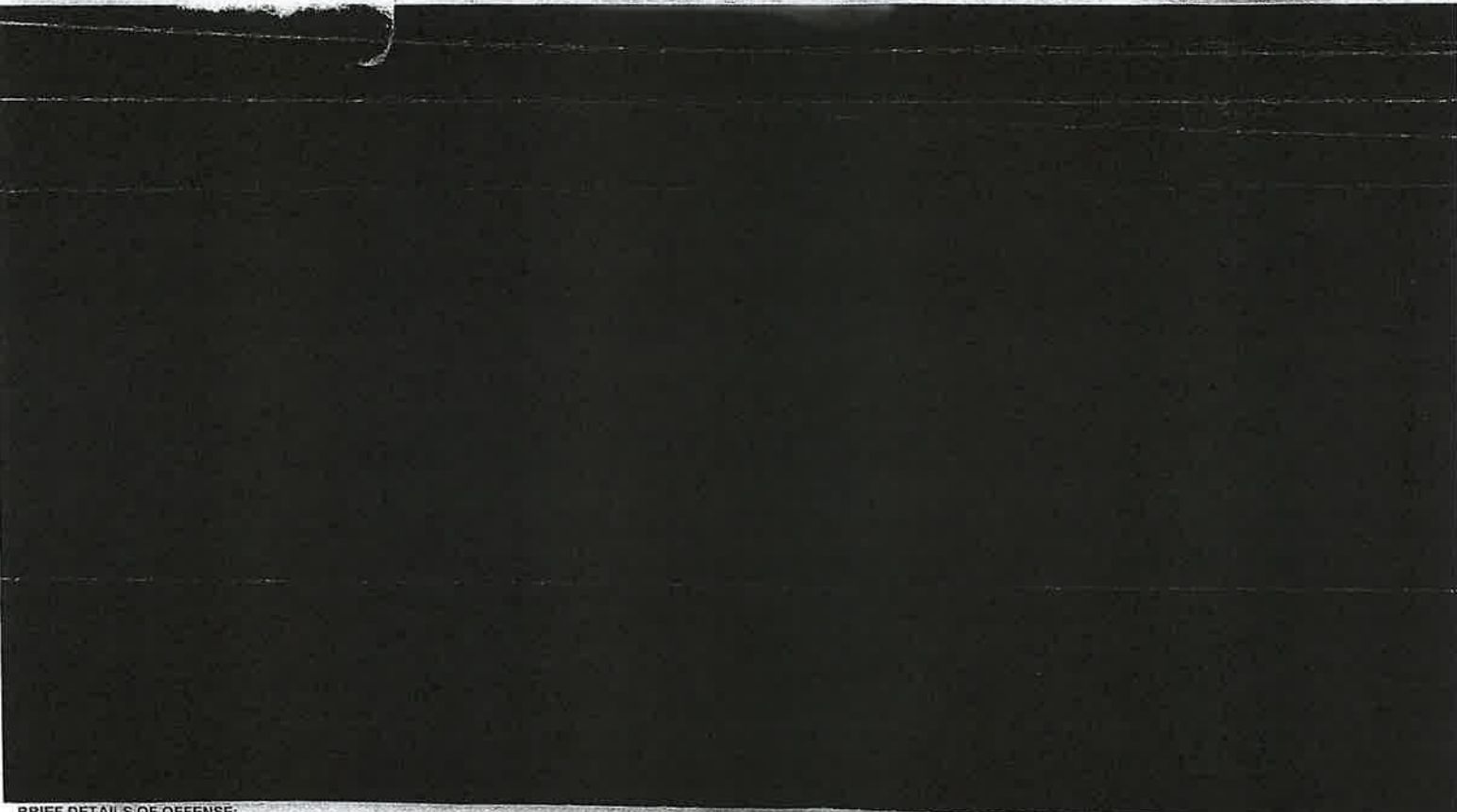
CC: 22-0437577/SPD ARREST: 011730-22 PIN: 776943



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: HURT, JOSHUA K

ARREST	DATE OF ARREST 08/06/22	TIME OF ARREST 1255	ARREST TYPE SIGHT (SUMMARY)			LOCATION OF ARREST STRAIGHT PATH N. OF ILLINOIS, DIX HILLS			( ) INSIDE (X) OUTSIDE	
	INCIDENT LOCATION: 3635 EXPRESS DRIVE NORTH ISLANDIA, ISLIP					OCCURRED: (X) ON ( ) BETWEEN		DATE: 07/30/22	TO DATE:	
	ARRESTING OFFICER: YOUNG, DAVID C			PID # 32551	SHIELD 4486	RANK PO	COMMAND 0420			
	[REDACTED]			WEAPON (DESCRIBE)						
	CT 001	LAW PL	ART 240.78	SUB	CLASS B	DEG 0	CAT M	DESCRIPTION MAKING A THREAT OF MASS HARM		ATT. COMP. X
LAST NAME HURT			FIRST JOSHUA	MI K	NICKNAME / ALIAS			DATE OF BIRTH 01/05/1994		
ADDRESS 135 N. 28TH ST.			CITY WHEATLEY HEIGHTS	STATE NY	ZIP 11798	NYSID# 13813843J		[REDACTED]		



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT JAKES 58 CASINO 3635 EXPRESS DRIVE NORTH, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT JULY 30, 2022, AT APPROXIMATELY 8:30 P.M., POSTED ON THE WEBSITE [REDACTED] IN A PUBLIC COMMENTS SECTION FOR JAKE'S 58 CASINO THAT HE WOULD [REDACTED]

CERTIFIED   
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPT.

REPORTING OFFICER NAME YOUNG, DAVID C	RANK PO	SHIELD 4486	COMMAND 0420	PCT 02	SECTOR 220
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CC: 22-0730608/SPD ARREST: 017807-22 PIN: 778617



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

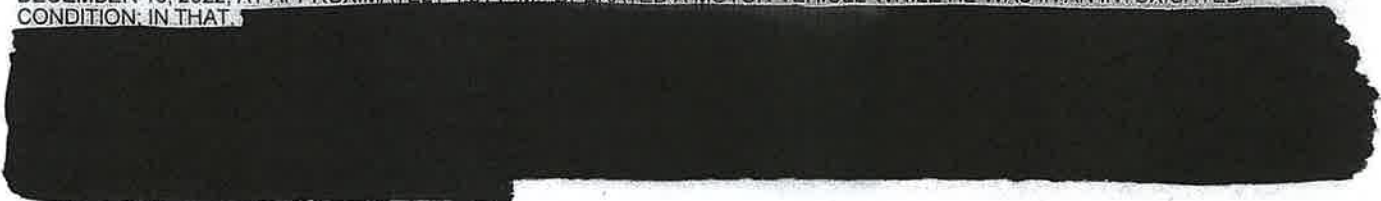
LAST NAME, FIRST MI: FAHEY, KATHERINE R

ARREST	DATE OF ARREST 12/16/22	TIME OF ARREST 1739	ARREST TYPE SIGHT (SUMMARY)			LOCATION OF ARREST 3635 EXPRESS DR N, ISLANDIA ( ) INSIDE (X) OUTSIDE			
	INCIDENT LOCATION: 3635 EXPRESS DR N ISLANDIA, ISLIP					OCURRED: (X) ON ( ) BETWEEN	DATE: 12/16/22 TIME: 1631	TO DATE: TIME:	
	ARRESTING OFFICER: BIONDO, JOSEPH D			PID # 80443	SHIELD	RANK	COMMAND		
	[REDACTED]			WEAPON (DESCRIBE)					
	CT 001	LAW VTL	ART 1192	SUB 03	CLASS U	DEG 0	CAT M	DESCRIPTION DWI- 1ST OFFENSE	ATT. COMP. X
LAST NAME FAHEY		FIRST KATHERINE	MI R	NICKNAME / ALIAS			DATE OF BIRTH 07/02/1953		
ADDRESS 15 IROQUOIS TRAIL		CITY RIDGE	STATE NY	ZIP 11961	NYSID# 15778606L		[REDACTED]		



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DR N, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT DECEMBER 16, 2022, AT APPROXIMATELY 4:31 P.M., OPERATED A MOTOR VEHICLE WHILE HE WAS IN AN INTOXICATED CONDITION. IN THAT,



CERTIFIED ✓  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME FRANQUIE, LIZA	RANK	SHIELD	COMMAND 0000	PCT 04	SECTOR 417
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CC: 23-0217680/SPD ARREST: 050795-23 PIN: 465301



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: WILLIAMS, KENYON R

ARREST	DATE OF ARREST 06/27/23	TIME OF ARREST 1337	ARREST TYPE SIGHT (SUMMARY)			LOCATION OF ARREST 1531 STRAIGHT PATH, WYANDANCH ( ) INSIDE (X) OUTSIDE			
	INCIDENT LOCATION: 3635 EXPRESS DRIVE NORTH ISLANDIA, ISLIP					OCCURRED: DATE: 03/14/23 TO DATE: (X) ON ( ) BETWEEN TIME: 1347 TIME:			
	ARRESTING OFFICER: ENGELHARDT, THOMAS E					PID # 41117	SHIELD 6839	RANK PO	COMMAND 0120
	FINGER PRINTED: (X) YES ( ) NO		PHOTOGRAPHED: (X) YES ( ) NO		WEAPON (DESCRIBE)				
	CT 001 002	LAW PL PL	ART 220.39 220.39	SUB 01 01	CLASS B B	DEG 3 3	CAT F F	DESCRIPTION CSCS-3RD:NARCOTIC DRUG CSCS-3RD:NARCOTIC DRUG	ATT. COMP. X X
LAST NAME WILLIAMS			FIRST KENYON	MI R	NICKNAME / ALIAS WILLIAMS JAMELL			DATE OF BIRTH 05/30/1985	
ADDRESS 9 HENRY ST			CITY WYANDANCH	STATE NY	ZIP 11798	NYSID# 01701496R	[REDACTED]		



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DRIVE NORTH, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT MARCH 14, 2023, AT APPROXIMATELY 1:47 P.M., DID SELL A QUANTITY OF A NARCOTIC DRUG, NAMELY CRACK COCAINE, TO ANOTHER FOR A SUM OF UNITED STATES CURRENCY. THIS ARREST IS ALSO BASED ON THE RESULTS OF A SUFFOLK COUNTY CRIMINALISTICS LABORATORY TEST PERFORMED ON A SAMPLE OF THE MATERIAL BY FORENSIC SCIENTIST ERIC SORRENTINO, DATED 04/05/23, WHICH PROVED POSITIVE FOR THE PRESENCE OF COCAINE.

CERTIFIED  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME ENGELHARDT, THOMAS E	RANK PO	SHIELD 6839	COMMAND 0120	PCT 01	SECTOR 105
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REVIEW COPY

PRINT DATE: 03/21/24 PRINT TIME: 11:41:40

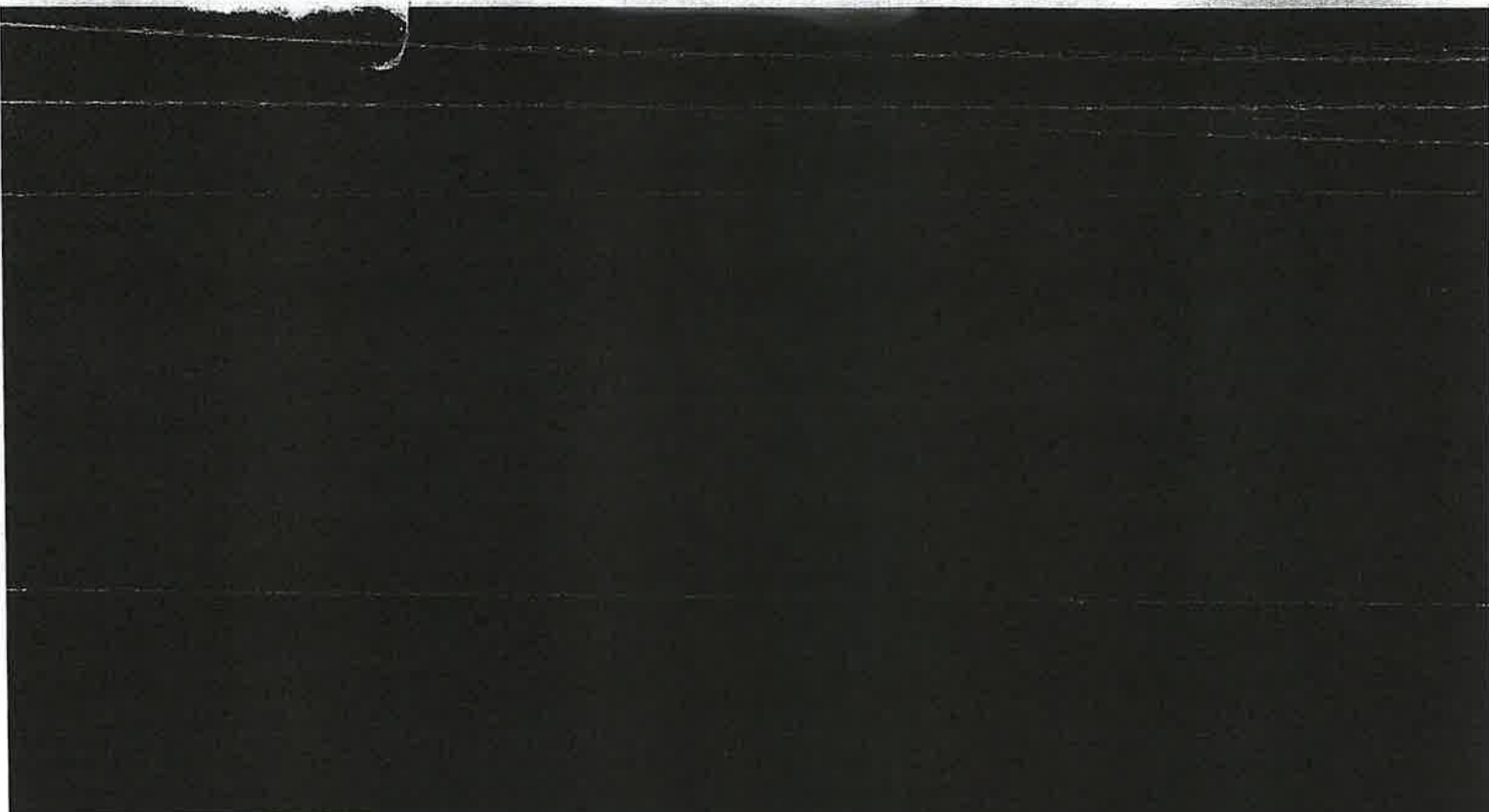
CC: 23-0492308/SPD ARREST: 052434-23 PIN: 782513



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: AHMED, ZEESHAN

ARREST	DATE OF ARREST 07/25/23	TIME OF ARREST 0006	ARREST TYPE SIGHT (SUMMARY)			LOCATION OF ARREST 3635 EXPRESS DR NORTH, ISLANDIA ( ) INSIDE (X) OUTSIDE			
	INCIDENT LOCATION: 3635 EXPRESS DR NORTH ISLANDIA, ISLIP					OCURRED: (X) ON ( ) BETWEEN	DATE: 07/25/23	TO DATE:	
	ARRESTING OFFICER: HALPIN, PATRICK T			PID # 33459	SHIELD 4657	RANK PO	COMMAND 0410		
	WEAPON (DESCRIBE)								
CT 001 002	LAW PL PL	ART 240.20 195.05	SUB 07	CLASS 0 A	DEG 0 2	CAT V M	DESCRIPTION DIS CON: CREATE HAZARDOUS COND OBSTRUCT GOVERNMENTL ADMIN-2ND		ATT. COMP. X X
LAST NAME AHMED			FIRST ZEESHAN	MI	NICKNAME / ALIAS			DATE OF BIRTH 08/21/1982	
ADDRESS 351 GRAND BLVD			CITY DEER PARK	STATE NY	ZIP 11729	NYSID# 06766522N			



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DR NORTH, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT JULY 25, 2023, AT APPROXIMATELY 12:05 A.M., WITH INTENT TO CAUSE PUBLIC INCONVENIENCE, ANNOYANCE OR ALARM, OR RECKLESSLY CREATING A RISK THEREOF ENGAGED IN FIGHTING OR IN VIOLENT, TUMULTUOUS OR THREATENING BEHAVIOR; IN THAT,



CERTIFIED ✓  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME HALPIN, PATRICK T	RANK PO	SHIELD 4657	COMMAND 0410	PCT 04	SECTOR 417
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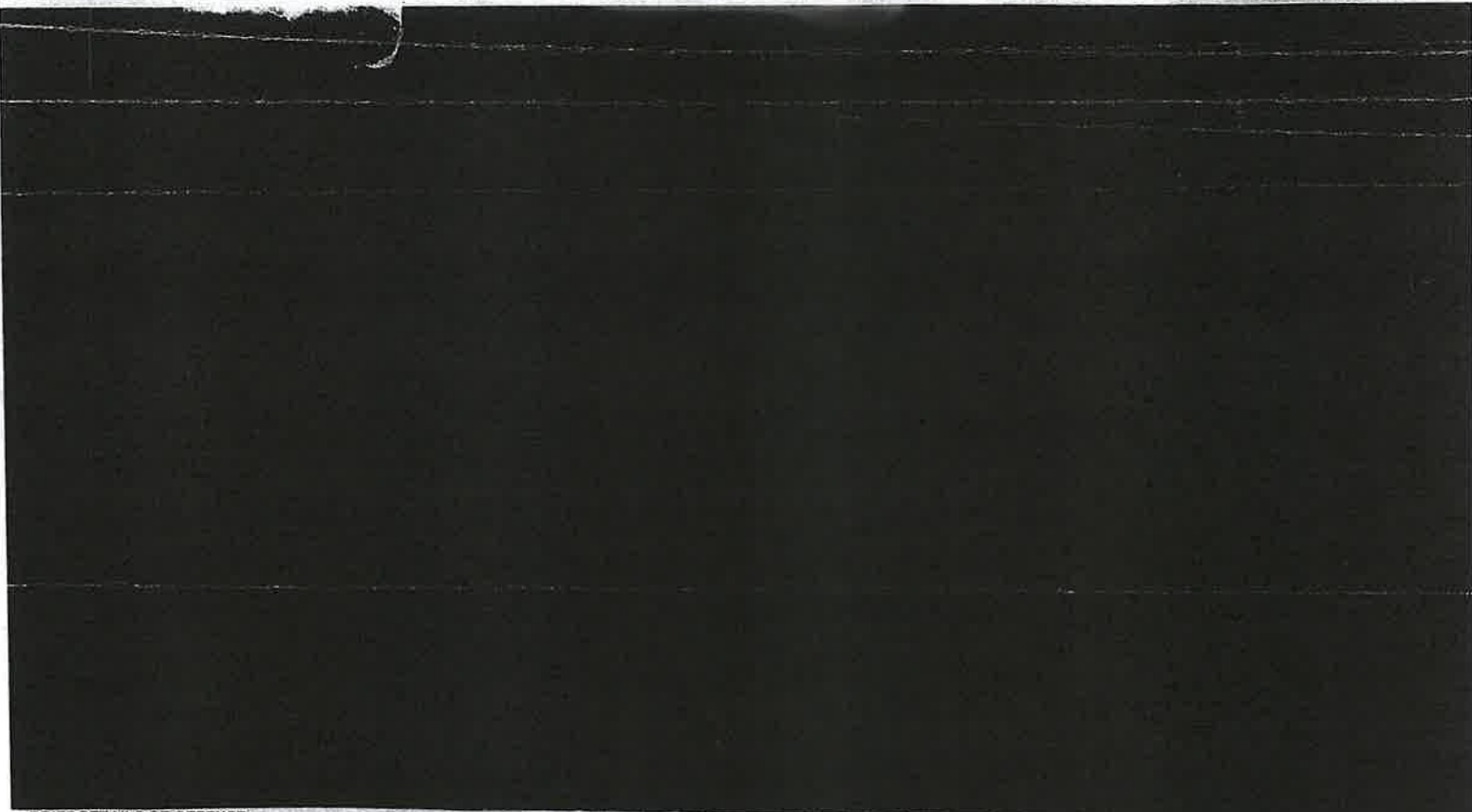
CC: 23-0615268/SPD ARREST: 056156-23 PIN: 711211



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: DAVIS,RAIQUON

ARREST	DATE OF ARREST	TIME OF ARREST	ARREST TYPE				LOCATION OF ARREST					
	09/20/23	1910	SIGHT (SUMMARY)				3635 EXPRESS DR N, ISLANDIA ( ) INSIDE (X) OUTSIDE					
	INCIDENT LOCATION:						OCCURRED:		DATE: 09/20/23		TO DATE:	
	3635 EXPRESS DR N ISLANDIA, ISLIP						(X) ON					
							( ) BETWEEN		TIME: 1910		TIME:	
ARRESTING OFFICER:				PID #	SHIELD	RANK	COMMAND					
THOMSON,WILLIAM A				41154	6876	PO	0610					
WEAPON (DESCRIBE)												
CT	LAW	ART		SUB	CLASS	DEG	CAT	DESCRIPTION				ATT. COMP.
001	PL	190.23			B	0	M	FALSE PERSONATION				X
002	PL	195.05			A	2	M	OBSTRUCT GOVERNMENTL ADMIN-2ND				X
LAST NAME			FIRST			MI			NICKNAME / ALIAS			DATE OF BIRTH
DAVIS			RAIQUON						DAVIS RAQUIAN			11/28/1997
ADDRESS				CITY	STATE	ZIP	NYSID#					
36H COUNTRY CLUB DR				CORAM	NY	11727	13228372Y					



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DR N, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT SEPTEMBER 20, 2023, AT APPROXIMATELY 7:15 P.M., AFTER BEING INFORMED OF THE CONSEQUENCES OF SUCH ACT, KNOWINGLY MISREPRESENTED HIS OR HER ACTUAL NAME, DATE OF BIRTH OR ADDRESS TO A POLICE OFFICER OR PEACE OFFICER WITH INTENT TO PREVENT SUCH POLICE OFFICER OR PEACE OFFICER FROM ASCERTAINING SUCH INFORMATION. IN THAT



CERTIFIED  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME	RANK	SHIELD	COMMAND	PCT	SECTOR
THOMSON,WILLIAM A	PO	6876	0610	04	417

CC: 23-0649347/SPD ARREST: 057217-23 PIN: 476188



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: MACK, ANDRE D

ARREST	DATE OF ARREST 10/07/23	TIME OF ARREST 1400	ARREST TYPE SIGHT (SUMMARY)			LOCATION OF ARREST 101 HOSPITAL ROAD, BROOKHAVEN				<input checked="" type="checkbox"/> INSIDE ( ) OUTSIDE	
	INCIDENT LOCATION: 3635 EXPRESS DRIVE NORTH ISLANDIA, ISLIP					OCURRED: ( ) ON	DATE: 10/07/23	TO DATE: 10/07/23			
						(X) BETWEEN	TIME: 0513	TIME: 0540			
	ARRESTING OFFICER: SCHREINER, DANIEL S			PID # 41863	SHIELD 7566	RANK PO	COMMAND 0510				
[REDACTED]			WEAPON (DESCRIBE)								
CT 001	LAW PL	ART 120.14	SUB 01	CLASS A	DEG 2	CAT M	DESCRIPTION MENACING-2ND:WEAPON				ATT. COMP. X
LAST NAME MACK			FIRST ANDRE	MI D	NICKNAME / ALIAS LIL CUZ DRE				DATE OF BIRTH 09/30/1987		
ADDRESS 128 POOSPATUCK LANE			CITY MASTIC	STATE NY	ZIP 11950	NYSID# 03248467Q	[REDACTED]				

BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DRIVE NORTH, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, BETWEEN OCTOBER 7, 2023, AT 5:13 A.M. AND OCTOBER 7, 2023, AT 5:40 A.M., INTENTIONALLY PLACED OR ATTEMPTED TO PLACE ANOTHER PERSON IN REASONABLE FEAR OF PHYSICAL INJURY, SERIOUS PHYSICAL INJURY OR DEATH BY DISPLAYING A DEADLY WEAPON OR DANGEROUS INSTRUMENT OR WHAT APPEARS TO BE A PISTOL, REVOLVER, RIFLE, SHOTGUN, MACHINE GUN OR OTHER FIREARM:

CERTIFIED ✓  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME CHARUBIN, KRISTOPHER	RANK DET	SHIELD 1714	COMMAND 3140	PCT 05	SECTOR 512
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CC: 23-0648552/SPD ARREST: 057216-23 PIN: 476188



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: MACK, ANDRE D

ARREST	DATE OF ARREST	TIME OF ARREST	ARREST TYPE			LOCATION OF ARREST			<input checked="" type="checkbox"/> INSIDE ( ) OUTSIDE				
	10/07/23	1400	SIGHT (SUMMARY)			101 HOSPITAL RD, EAST PATCHOGUE							
	INCIDENT LOCATION:						OCCURRED:		DATE: 10/07/23 TO DATE: 10/07/23				
	3635 EXPRESS DR N RM 430 ISLANDIA, ISLIP						( ) ON						
ARRESTING OFFICER:						PID #		SHIELD		RANK		COMMAND	
TIRELLI, ANDREW G						41604		7311		PO		0510	
[REDACTED]													
CT	LAW	ART	SUB	CLASS	DEG	CAT	DESCRIPTION			ATT. COMP.			
001	PL	120.05	02	D	2	F	ASLT W/INT CAUSE PH INJ W/WEAP			X			
LAST NAME			FIRST		MI		NICKNAME / ALIAS			DATE OF BIRTH			
MACK			ANDRE		D		LIL CUZ DRE			09/30/1987			
ADDRESS			CITY		STATE		ZIP		NYSID#		[REDACTED]		
128 POOSPATUCK LANE			MASTIC		NY		11950		03248467Q				

BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DR N RM 430, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, BETWEEN OCTOBER 7, 2023, AT 5:31 A.M. AND OCTOBER 7, 2023, AT 5:41 A.M., INTENTIONALLY CAUSED PHYSICAL INJURY TO ANOTHER PERSON BY MEANS OF A DEADLY WEAPON OR DANGEROUS INSTRUMENT;

CERTIFIED  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME	RANK	SHIELD	COMMAND	PCT	SECTOR
RATHBURN, BRIAN T	DET	1490	3140	05	512

CC: 23-0801103/SPD ARREST: 061932-23 PIN: 785480



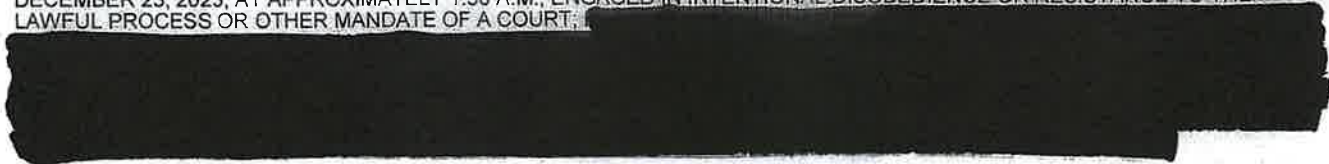
POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: BISSESSAR, TREVOR

ARREST	DATE OF ARREST 12/23/23	TIME OF ARREST 0255	ARREST TYPE SIGHT (SUMMARY)			LOCATION OF ARREST 3635 EXPRESS DR N, ISLANDIA			<input checked="" type="checkbox"/> INSIDE ( ) OUTSIDE	
	INCIDENT LOCATION: 3635 EXPRESS DR N ISLANDIA, ISLIP					OCCURRED: <input checked="" type="checkbox"/> ON <input type="checkbox"/> BETWEEN		DATE: 12/23/23	TO DATE: TIME: TIME: 0130	
	ARRESTING OFFICER: DANGIO, DIANA			PID # 41627	SHIELD 7334	RANK PO	COMMAND 0410			
	[REDACTED]					WEAPON (DESCRIBE)				
	CT 001	LAW PL	ART 215.50	SUB 03	CLASS A	DEG 2	CAT M	DESCRIPTION CRIM CONTEMPT-2ND: DISOBEY CRT		ATT. COMP. X
LAST NAME BISSESSAR			FIRST TREVOR	MI	NICKNAME / ALIAS TRUE			DATE OF BIRTH 03/05/1982		
ADDRESS 9072 199TH ST			CITY HOLLIS	STATE NY	ZIP 11423	NYSID# 09488917R		[REDACTED]		

BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DR N, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT DECEMBER 23, 2023, AT APPROXIMATELY 1:30 A.M., ENGAGED IN INTENTIONAL DISOBEDIENCE OR RESISTANCE TO THE LAWFUL PROCESS OR OTHER MANDATE OF A COURT;



CERTIFIED  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPAR

REPORTING OFFICER NAME DANGIO, DIANA	RANK PO	SHIELD 7334	COMMAND 0410	PCT 04	SECTOR 417
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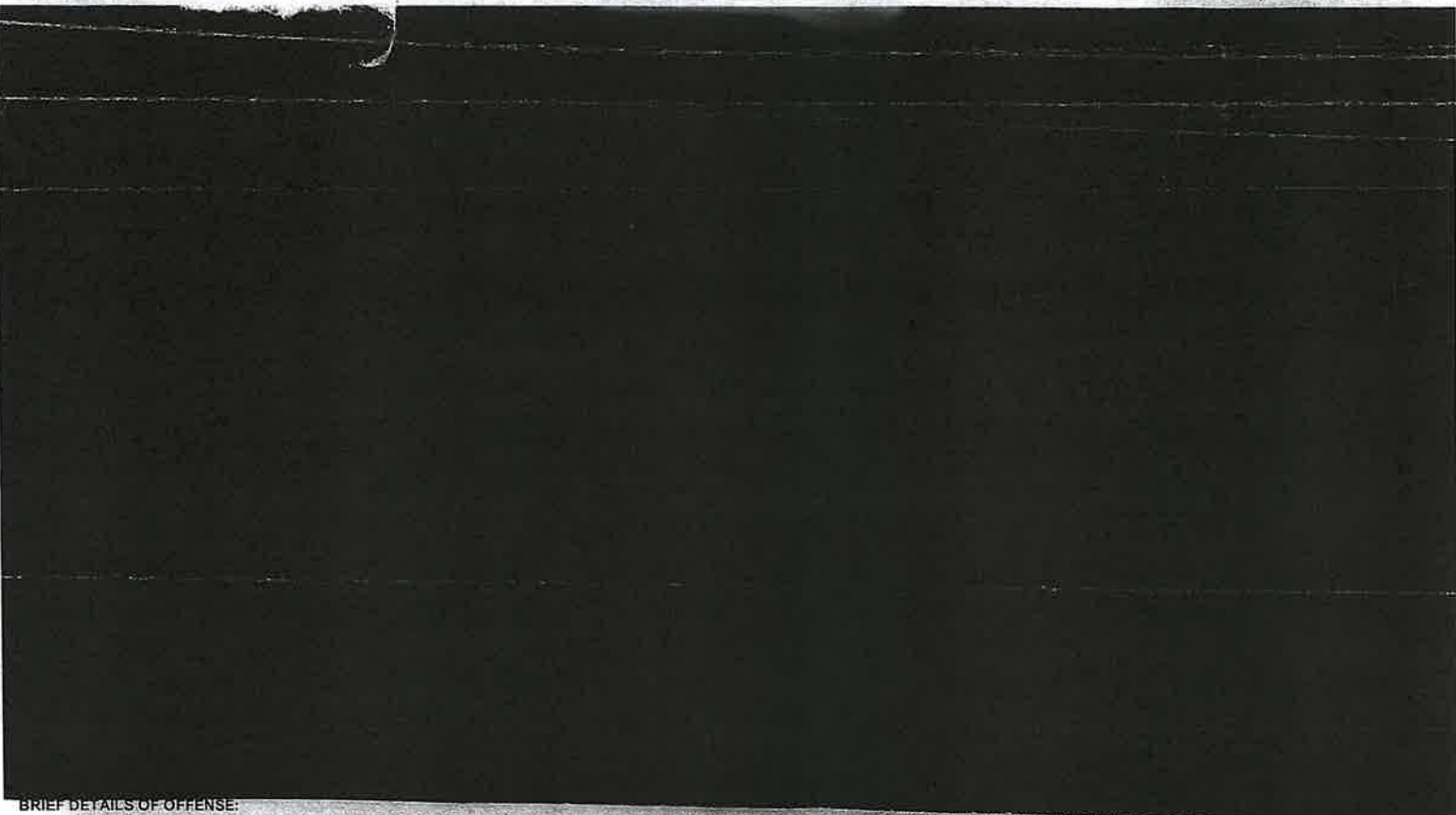
CC: 24-0113801/SPD ARREST: 002215-24 PIN: 474732



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

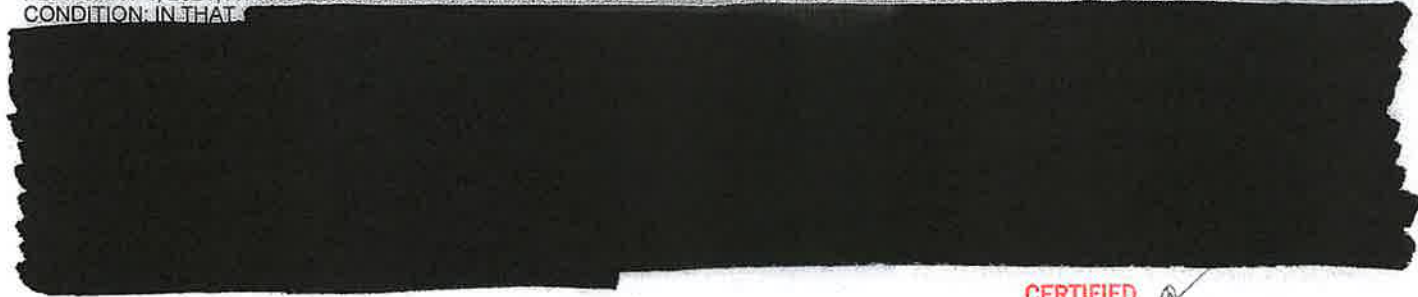
LAST NAME, FIRST MI: VELASQUEZ, CARLOS V

ARREST	DATE OF ARREST	TIME OF ARREST	ARREST TYPE			LOCATION OF ARREST			( ) INSIDE (X) OUTSIDE
	02/04/24	0402	SIGHT (SUMMARY)			3635 EXPRESS DR N, ISLANDIA			
	INCIDENT LOCATION:						OCCURRED:	DATE: 02/04/24	TO DATE:
	3635 EXPRESS DR N ISLANDIA, ISLIP						(X) ON		
							( ) BETWEEN	TIME: 0327	TIME:
ARRESTING OFFICER:			PID #	SHIELD	RANK	COMMAND			
WOOL, GARDY J			40246	5946	PO	0410			
WEAPON (DESCRIBE)									
CT	LAW	ART	SUB	CLASS	DEG	CAT	DESCRIPTION	ATT. COMP.	
001	VTL	1192	03	U	0	M	DWI- 1ST OFFENSE	X	
002	VTL	1192	02	U	0	M	OPER MV BAC .08 OF 1% -1ST OFF	X	
LAST NAME			FIRST	MI	NICKNAME / ALIAS			DATE OF BIRTH	
VELASQUEZ			CARLOS	V				06/19/1968	
ADDRESS			CITY	STATE	ZIP	NYSID#			
97 W PULASKI RD			HUNTINGTON STATION	NY	11746	03116362R			



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DR N, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT FEBRUARY 4, 2024, AT APPROXIMATELY 3:27 A.M., OPERATED A MOTOR VEHICLE WHILE HE WAS IN AN INTOXICATED CONDITION. IN THAT:



CERTIFIED  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME WOOL, GARDY J	RANK PO	SHIELD 5946	COMMAND 0410	PCT 04	SECTOR 417
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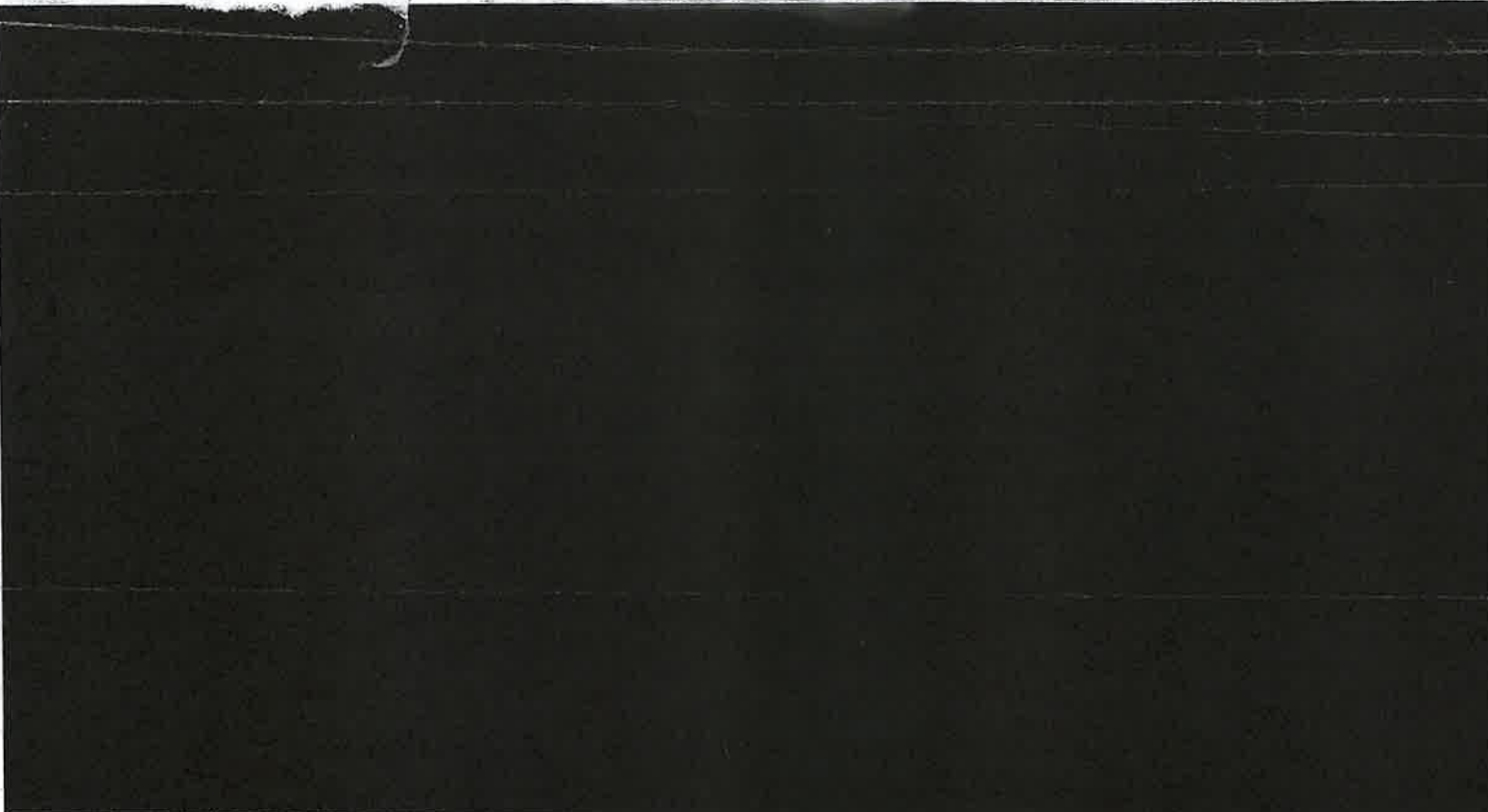
CC: 23-0197071/SPD ARREST: 043837-23 PIN: 617591



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: DIPRIMA, KEVIN G

ARREST	DATE OF ARREST	TIME OF ARREST	ARREST TYPE		LOCATION OF ARREST				( ) INSIDE (X) OUTSIDE
	03/04/23	0031	SIGHT (SUMMARY)		3635 EXPRESS DRIVE NORTH, ISLANDIA				
	INCIDENT LOCATION:				OCCURRED:	DATE: 03/03/23	TO DATE:		
	3635 EXPRESS DRIVE NORTH ISLANDIA, ISLIP				(X) ON				
					( ) BETWEEN	TIME: 2000	TIME:		
ARRESTING OFFICER:		PID #		SHIELD	RANK	COMMAND			
GUGLIELMO, ASHLEY A		41227		6947	PO	0410			
FINGER PRINTED:		PHOTOGRAPHED:		WEAPON (DESCRIBE)					
(X) YES ( ) NO		(X) YES ( ) NO							
CT	LAW	ART	SUB	CLASS	DEG	CAT	DESCRIPTION	ATT. COMP.	
001	PL	145.00	04	A	4	M	CRIM MIS 4: PREVNT EMERGENCY CAL	X	
LAST NAME		FIRST		MI	NICKNAME / ALIAS			DATE OF BIRTH	
DIPRIMA		KEVIN		G				08/01/1981	
ADDRESS		CITY	STATE	ZIP	NYSID#				
82 CYPRESS DRIVE		RIVERHEAD	NY	11901	07808049K				



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DRIVE NORTH, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT MARCH 3, 2023, AT APPROXIMATELY 8:00 P.M., THE DEFENDANT A KEVIN DIPRIMA (08/01/1981) DID INTENTIONALLY GRAB THE CELLPHONE OF [REDACTED] WHILE SHE WAS ATTEMPTING TO CALL 9-11 AND DID THROW THE CELL PHONE INTO THE MIRROR THE GLASS DOOR CAUSING THE PHONE TO SHATTER. THIS ARREST IS BASED IN PART ON THE SWORN ATTACHED SIGNED STATEMENT GIVEN TO YOUR DEPONENT BY [REDACTED] DATED ON 03/03/2023. THIS ARREST IS ALSO BASED ON THE SWORN ATTACHED SIGNED AFFIDAVIT FROM [REDACTED] DATED 03/03/2023.

CERTIFIED  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME GUGLIELMO, ASHLEY A	RANK PO	SHIELD 6947	COMMAND 0410	PCT 04	SECTOR 417
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CC: 23-0196839/SPD ARREST: 043836-23 PIN: 617591



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: DIPRIMA, KEVIN G

ARREST	DATE OF ARREST 03/04/23	TIME OF ARREST 0031	ARREST TYPE CIVILIAN ARREST	LOCATION OF ARREST 3635 EXPRESS DRIVE NORTH, ISLANDIA ( ) INSIDE (X) OUTSIDE				
	INCIDENT LOCATION: 3635 EXPRESS DRIVE NORTH ISLANDIA, ISLIP			OCCURRED: <input checked="" type="checkbox"/> ON <input type="checkbox"/> BETWEEN	DATE: 03/03/23 TIME: 2000	TO DATE: TIME:		
	ARRESTING OFFICER: GUGLIELMO, ASHLEY A		PID # 41227	SHIELD 6947	RANK PO	COMMAND 0410		
	FINGER PRINTED: <input type="checkbox"/> YES <input type="checkbox"/> NO	PHOTOGRAPHED: <input type="checkbox"/> YES <input type="checkbox"/> NO	WEAPON (DESCRIBE)					
	CT 001	LAW PL	ART 240.26	SUB 01	CLASS 0	DEG 2	CAT V	DESCRIPTION HARASSMENT-2ND: PHYSICAL CONTACT

LAST NAME DIPRIMA	FIRST KEVIN	MI G	NICKNAME / ALIAS	DATE OF BIRTH 08/01/1981
ADDRESS 14 DUBOIS ROAD	CITY WEST ISLIP	STATE NY	ZIP 11910	NYSID# 07808049K



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DRIVE NORTH, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, ON OR ABOUT MARCH 3, 2023, AT APPROXIMATELY 8:00 P.M., THE DEFENDANT DID GRAB ME, [REDACTED] WITH BOTH HIS HANDS AND DID TAKE HIS LEFT HAND AND MADE A CLOSED FIST AND DID PUNCH ME IN THE CHEST CAUSING PAIN AND FOR ME TO BE ALARMED AND ANNOYED.

CERTIFIED  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME GUGLIELMO, ASHLEY A	RANK PO	SHIELD 6947	COMMAND 0410	PCT 04	SECTOR 417
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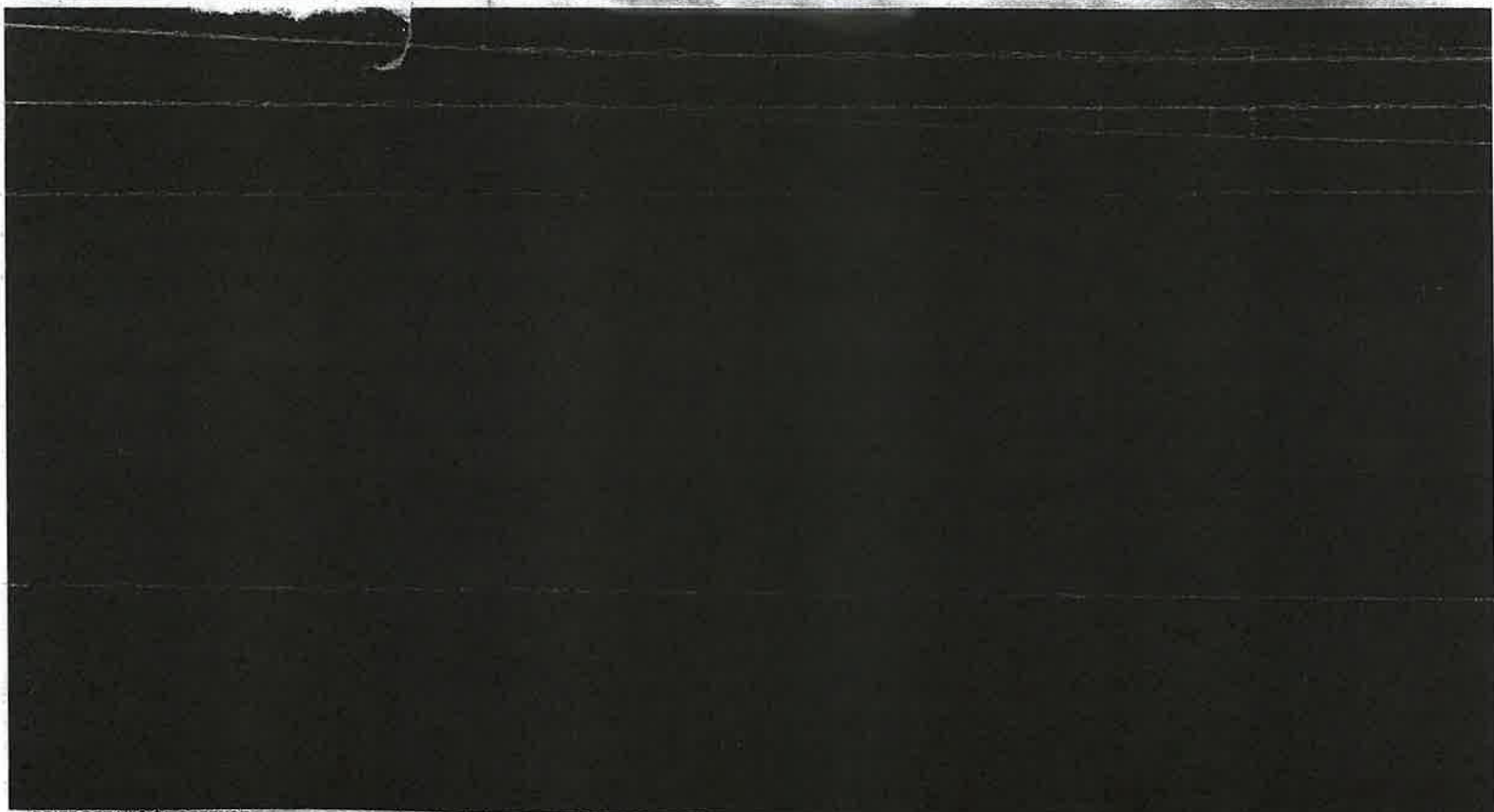
CC: 23-0120509/SPD ARREST: 052465-23 PIN: 355555



POLICE DEPARTMENT, COUNTY OF SUFFOLK NY  
ACCREDITED LAW ENFORCEMENT AGENCY  
ARREST REPORT PDCS-1045C

LAST NAME, FIRST MI: ROGERS,JOHN K

ARREST	DATE OF ARREST 07/25/23	TIME OF ARREST 1454	ARREST TYPE SIGHT (SUMMARY)			LOCATION OF ARREST 64 PHILLIPS WALK, WEST BABYLON			( ) INSIDE (X) OUTSIDE	
	INCIDENT LOCATION: 3635 EXPRESS DR N ISLANDIA, ISLIP					OCCURRED: ( ) ON (X) BETWEEN		DATE: 01/23/23	TO DATE: 01/27/23	
	ARRESTING OFFICER: ANTONIADES,JOHN J					PID # 41346	SHIELD 7065	RANK PO	COMMAND 4020	
	[REDACTED]					WEAPON (DESCRIBE)				
	CT 001	LAW PL	ART 220.39	SUB 01	CLASS B	DEG 3	CAT F	DESCRIPTION CSCS-3RD:NARCOTIC DRUG		ATT. COMP. X
LAST NAME ROGERS			FIRST JOHN	MI K	NICKNAME / ALIAS ADAMS SHAWN			DATE OF BIRTH 01/23/1980		
ADDRESS 24 MILL ST			CITY AMITYVILLE	STATE NY	ZIP 11701	NYSID# 08226742Q		[REDACTED]		



BRIEF DETAILS OF OFFENSE:

THE DEFENDANT, AT 3635 EXPRESS DR N, ISLANDIA, IN THE TOWN OF ISLIP, SUFFOLK COUNTY, NEW YORK, BETWEEN JANUARY 23, 2023, AT 12:01 A.M. AND JANUARY 27, 2023, AT 12:01 A.M.



CERTIFIED ✓  
CENTRAL RECORDS SECTION  
SUFFOLK COUNTY POLICE DEPARTMENT

REPORTING OFFICER NAME ANTONIADES,JOHN J	RANK PO	SHIELD 7065	COMMAND 4020	PCT 01	SECTOR 116
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