

The Venetian® Resort Las Vegas – Policy

Policy Title:	Human Trafficking Prevention Policy		
Division:	All	Department:	All
Date Approved:	02/23/2023	Owned By:	Compliance Department
Next Review Date:	02/23/2024	Approved By:	Norman Richardson, Vice President and Compliance Officer

POLICY

1. POLICY STATEMENT

Guided by our values and beliefs, the Venetian Resort Las Vegas (hereinafter the “Venetian” or “Company”) is committed to integrity and social responsibility. Paramount to this commitment is the manner in which we treat our Team Members and guests, as well as the way in which those from whom we purchase goods and services treat their employees. This Policy outlines the Venetian’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 (as defined below), in its operations and global supply chain.

2. SCOPE

This Policy accords with international standards and the Human Trafficking laws of the United States, 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 (“UNTOC”)
- The Trafficking Victims Protection Act (TVPA) of 2000, as amended

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

3. DEFINITIONS

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

- Child Labor** does not include all work performed by minors; rather, “child labor” that should be targeted for elimination is often defined as that which is mentally, physically, socially, or morally dangerous and harmful to children and/or interferes with their schooling. It deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development¹.
- Commercial Sex** is the exchange of money or goods for sexual services.
- Covered Entities** includes Venetian agents, contractors, subcontractors, and suppliers.

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

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 work². 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 bondage³. Human Trafficking includes Sex Trafficking, Forced Labor, and Child Labor, as defined in this section.

G. **Organ Trafficking** is the recruitment, transportation, transfer, harboring, or receipt of human organs, or a living or deceased person for the purpose of organ transplantation by means of threat or use of force or other forms of coercion, abduction, fraud, or deception.⁴

H. **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.⁵

4. APPLICATION AND RESPONSIBILITIES

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

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.

Venetian 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 the Venetian.

² <https://2009-2017.state.gov/j/tip/rls/tiprpt/2013/210543.htm>

³ <https://www.state.gov/trafficking-in-persons-report-2020/>

⁴ http://www.uncjin.org/Documents/Conventions/dcatoc/final_documents_2/convention_%20traff_eng.pdf.

⁵ <https://2009-2017.state.gov/j/tip/rls/tiprpt/2013/210543.htm>

5. REQUIREMENTS OF THE POLICY

A. Human Trafficking Prevention Generally

The Venetian 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, the Venetian 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 Venetian 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 the Venetian 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, the Venetian 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).

All information contained herein is owned by Venetian Las Vegas Gaming, LLC and its subsidiaries (the "Company"). Misuse or unauthorized disclosure of Company information is prohibited and constitutes grounds for disciplinary action up to and including termination. The Company reserves the right to change its policies, standards, and procedures.

B. Reporting and Non – Retaliation

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

C. Violations

- i. The Venetian 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 Entities is found to be violation of this Policy by engaging in any of the prohibited activities contained herein, the Venetian 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 Company Compliance Officer.

7. POLICY ACCESS

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

RESOURCES AND SUPPLEMENTAL INFORMATION

Reporting and Non-Retaliation Policy (English)

Supplier Code of Conduct

Code of Business Conduct & Ethics (English)

Questions? Contact:

Compliance Department

Venetian Resort Las Vegas Compliance Department	LV_Compliance@venetianlasvegas.com/ 702-414-4417
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Legal Department

Venetian Resort Las Vegas Legal Department	702-414-4288
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EthicsPoint Hotline

Anonymous reporting website and hotline	venetianlasvegas.ethicspoint.com
	844 988-1697

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