

# Wynn Macau, Limited

## *Sustainability Principles*

The Sustainability Principles have been developed to highlight and provide visibility to elements of the extensive policies Wynn has in place which govern workflow processes and practices. Our policies are instrumental to our effective operations and world-class quality service, and thus are comprehensive in nature. As such, the essence of these policies has been summarized and disclosed herein as our Sustainability Principles.

Our Sustainability Principles and the comprehensive suite of policies that support them guide our progress. Reporting annually on our efforts, goals, and performance helps us to identify opportunities to enhance employee and customer loyalty, improve operating efficiencies, and increase shared stakeholder value. Our latest Sustainability Reports are available on our corporate website.

## Commitment

We acknowledge our responsibility to society and the environment and we commit to work alongside governments and industry, to do our part to ensure a better future for our employees, our guests, our stakeholders. As a company, we are committed to delivering the highest standards of luxury hospitality to our guests, while at the same time ensuring that we are a sustainably minded, caring and responsible leader. Our success is tied to a commitment to excellence, respect for our employees, and an unwavering dedication to service that extends to the communities where we live and work.

### **Our commitment extends to:**

- Financial and economic considerations:
  - Corporate governance
  - Socio-economic commitment to the community
- Social considerations:
  - Adhering to high standards of ethical business conduct
  - Creating a culture that is inclusive and supportive
  - Supporting our local community and local businesses
- Environmental management:
  - Responsible use of natural resources
  - Minimizing emissions and waste
- Compliance-driven practices:
  - Regulatory compliance
  - Protecting customer privacy
  - Supporting responsible gaming initiatives
  - Monitoring conflicts of interest

## Scope

The scope of these Sustainability Principles includes Wynn Macau, Limited and its subsidiaries. Any business carried out by such subsidiaries, or by suppliers and sub-suppliers on behalf of Wynn, should fully commit to the application of the Sustainability Principles.

We endorse the application of the Precautionary Principle. This means that Wynn, our subsidiaries and suppliers should act in a manner that reduces or avoids potential negative environmental impact, particularly in the event of incomplete knowledge of the impact of proposed actions. The Sustainability Principles may be modified from time-to-time as disclosure requirements and the expectations of our stakeholders evolve.

*References to “Wynn”, “us”, “our” or “we” refer to Wynn Macau, Limited (the “Company”) and its subsidiaries, or any of them, and the businesses carried on by such subsidiaries, except where the context makes it clear otherwise. References to “Wynn Macau” include “Encore at Wynn Macau”.*

## Governance

The sustainable growth of any company is founded on the vision and leadership of the Board of Directors of the Company (“Board”) with support from senior management. At Wynn, we are aware of the need to balance our growth with ensuring we support and contribute to the overall well-being of society and the preservation of the environment. Our Board has overall responsibility for our sustainability strategy and for creating the governance framework under which our business units operate.

The Sustainability Committee of Wynn Resorts (Macau) S.A., established in 2017, consists of key management staff from various departments that represent critical facets of our business operations. It is responsible for developing, implementing, and monitoring environmental, social, and governance policies, practices and strategies that will promote sustainable development. Effective communications between the Board, the Sustainability Committee and the entirety of our workforce ensures and supports the responsible growth of our company.



# Economic Principles

## **SOCIO-ECONOMIC COMMITMENT**

There is a strong connection between the impact of Wynn's business activities with the socio-economic development within Macau and the Greater Bay Area. By responsibly growing our business, we are creating employment opportunities, invigorating local communities, and investing in the local economy.

## **SUPPORTING LOCAL SUPPLIERS**

We believe that supporting local businesses is a triple win scenario: we are able to better manage the quality of products and services, reduce the environmental impacts associated with logistics and transportation, and contribute to driving the development of Macau's economy. We select qualified local enterprises that can provide competitive and high-quality products and services. For more information on how we are supporting local suppliers, please see the WML Sustainability Report.

## **RESPONSIBLE SOURCING**

We are committed to managing our suppliers in a sustainable manner such that our Principles may be shared along the supply chain. We have developed a systematic procurement process, with the designation of department teams with specific responsibilities, to enable us to better manage suppliers, mitigate risks and meet our quality standards. We aim to source responsibly and have transparency and traceability within our supply chain. To mitigate risk, all suppliers are assessed using an internal approval process which includes quality, social and environmental criteria. Information about suppliers is collected and presented to the relevant departments and senior management for consideration and approval. The Procurement team works with prospective suppliers to gain an understanding of their business practices and our Corporate Investigations department conducts additional due diligence as deemed appropriate in each given case. By applying this approach to our broad network of suppliers we ensure that we satisfy our procurement needs responsibly, on competitive terms and meet our quality standards.



# Social Principles



## COMMUNITY INVOLVEMENT

Wynn is committed to ensuring our business practices provide a positive influence on our local community. Our efforts are defined by a structured framework that governs our processes and practices. The key programs that directly focus on local communities are the WE Volunteers and Wynn Care supported by both Human Resources and Community & Government Relations. More information on these programs can be found in the WML Sustainability Report. Our local community initiatives expand to all departments of our operations including Gaming, Hotel, Food & Beverage, Facilities (Environmental), Human Resources (Social), Learning & Advancement (Training) and other administration departments.

Our framework and governance include mission and vision statements, departmental functions and targeted groups based on community needs. Each department is assigned the purpose of helping Wynn become a truly local company and a pillar of the Macau community for the betterment of all Macau citizens. Further, we identify and engage key stakeholders to map the needs of the local community and target our efforts and resources appropriately. It is our goal to increase our resource allocation to impactful initiatives and maximize our return-on-social-and-community-investment.

As part of our planning and assessment we have engaged critical stakeholders and identified eight directions for our community outreach initiatives. Further, each undertaking or event is thoroughly considered and analyzed before implementation and afterward to assess performance and enact more consistent positive results.

We have identified those areas of our operations with the greatest potential impact on the local community and asserted our efforts to maximize those positive impacts and mitigate any negative social impact. In the WML Sustainability Report we acknowledge the areas where we have challenges and opportunities for improvement, while at the same time highlighting those areas where we have positively impacted the lives and well-being of those within our local community.

## ETHICS AND INTEGRITY

Understanding the stringent regulations within the gaming industry, we are committed to complying with all laws, rules and regulations that apply to our business.

We also strive to abide by high standards of ethical business conduct. To this end, we have instituted our *Code of Business Conduct and Ethics ("Code")* and *Code of Personal Conduct* as well as a host of guidelines, operating procedures and training to put our commitment to integrity into action. All our employees, officers and directors, agents and representatives must comply with our Code, which has been approved by our Board of Directors. The Code provides employees with guidance, contacts and protection for asking questions and reporting behaviours that might be in violation of its principles.

Beyond addressing proper business ethics, the Code also covers such topics as diversity and inclusion, conflicts of interest, political activities, information security and more. It is foundational to our sustainability commitment.





Along with our policies on anti-harassment and discrimination, it affirms our belief in and support of equal opportunity in employment to all persons regardless of race, color, national origin, citizenship status, sex, pregnancy, marital status, gender identity or expression, sexual orientation or perceived sexual orientation, age, religion, veteran status, military status, disability, history of disability or perceived disability, genetic information or any other protected category.

All new employees are trained in our Code and we require each employee to participate in an annual online refresher course and confirm their understanding and acceptance of the Code.

## **WORKPLACE PRACTICES**

Our recruitment and promotion practices are aligned with the Macau government's priorities where, by law, resident workers shall have precedence over non-resident workers, both in regards to hiring, as well as keeping an employment position.

Employees of Wynn are selected, remunerated and promoted on the basis of their merit, qualifications, competence and contribution to Wynn. We have a provident fund set up for our employees, an employee ownership scheme and a share option scheme. We also provide a suite of employee benefits which cover health, meals and bonuses as detailed in the WML Sustainability Report and provide maternity and paternity leave that exceeds local labor law requirements.

We have established effective and fair policies and practices relating to employee dismissal and discipline. One of the key objectives for such policies and practices is to ensure that such matters are handled in a fair, confidential, lawful and non-discriminatory manner.

## **EQUAL OPPORTUNITY AND DIVERSITY**

Wynn recognizes that each employee's unique experiences, perspectives, and viewpoints are critical to creating products and services that engage and inspire customers all over the world. Therefore, our goal is to create an environment that generates great ideas, attracts the best talent, and creates a profound sense of pride across our Company.

We are committed to providing equal opportunities for employment, job responsibility, advancement and training to qualified individuals. Our Equal Opportunity and Non-discrimination Policy, Preventing Harassment and Discrimination Policy, and Code of Personal Conduct ensure all employees understand our zero-tolerance position for discrimination in any form based on any grounds as stated in our Code of Business Conduct and Ethics.

## **SEXUAL HARRASMENT AND DISCRIMINATION**

The Company does not tolerate sexual or other unlawful harassment or discrimination by any employee, volunteer, vendor, contractor, consultant, guest, customer, or visitor. While employees are trained and encouraged to speak out when reporting policy violations, our Senior Vice President of Human Resources has the overall responsibility for maintaining effective enforcement of non-discrimination and harassment policies. Should there be suspected cases of harassment and discrimination, the HR team will investigate in a timely, neutral and fair manner, and all employees are expected to cooperate fully in any investigation.



## CHILD AND FORCED LABOUR

The Company has stringent measures in place to prevent child and forced labor. Our Human Resources and Corporate Investigation teams are vigilant in ensuring operations comply with all labor laws and regulations through established processes and control check points.

## HEALTH & SAFETY

Health and safety is a key priority for our employees and guests. The upkeep of health and safety standards are of paramount significance to a responsible business. We have established a cross-departmental Health and Safety Committee to oversee policies, guidelines, and practices to ensure the well-being of our employees at work. Appropriate personal protection equipment as well as adequate training has been provided on a regular basis to ensure and enhance employees and contractors' awareness of Wynn's safety standards. Procedures have also been detailed for staff to conduct regular inspections of facilities and equipment to ensure operational efficiency and safety of our guests.

# Environmental Principles

## COMPLIANCE AND OBJECTIVES

We strive to continuously improve our environmental performance. We not only comply with relevant legislation and requirements in all aspects of our business, but also seek to reduce our environmental impact.

Our approach includes environmental programs and procedures to monitor and assess our use of resources. In addition, we regularly test and implement innovations that improve efficiencies at both Wynn Macau and Wynn Palace.

Our core environmental management objectives are as follows:

- Mitigate emissions
- Promote energy efficiency
- Conserve water
- Minimize waste



## ENVIRONMENTAL MANAGEMENT

To align with international best-practices, we have committed to pursue EarthCheck certification. EarthCheck is widely regarded as the world's most scientifically rigorous environmental management system (EMS) designed specifically for companies operating in the travel and tourism industries. It is used to measure, monitor and manage key environmental indicators such as; energy and water consumption, waste production and environmental commitment to the local community. EarthCheck will enable us to continue to improve the standard of our environmental performance, and be a process in which we formalize our EMS approach with compliance to an internationally recognized standard.



# Compliance

## COMPLIANCE COMMITTEE

We have extensive policies, procedures and practices to ensure that our business operations comply with all relevant laws and regulations with respect to anti-corruption, anti-money laundering (“AML”), extortion, fraud and combatting the financing of terrorism (“CFT”).

Our senior management works closely with relevant departments such as Legal, Finance, Compliance, Security and Learning and Advancement to ensure substantial and up-to-date training on compliance and regulatory matters (including anti-corruption, AML and CFT) is provided to our employees. Our Board, the Committees of the Board and the Internal Audit department also contribute to our compliance efforts.

Our Compliance Committee, which was established before our operations commenced in 2006, meets regularly and oversees our compliance and regulatory related programs. We comply with applicable record keeping and anticorruption laws. We have also established focused subcommittees to review and manage specific compliance and regulatory matters, such as AML/know-your-client and CFT matters, and to examine the probity of our gaming promoters on a regular basis. These sub-committees comprise relevant senior management and employees. They meet on a regular basis to ensure that our operation teams properly implement all compliance and regulatory procedures in accordance with our own policies and applicable laws and regulations.

## ANNUAL MANDATORY TRAINING

Our employees have a wide-range of professional development and leadership training from which to choose. When it comes to ethics, compliance, safety, and responsible gaming, all Wynn employees are required to take part in selected training, and for certain job descriptions additional training is mandatory.

Wynn has implemented annual training provided by an external law firm including, but not limited to:

- Anti-Corruption
  - The Foreign Corrupt Practices Act (FCPA)
  - Anti-Corruption in Macau / Hong Kong / China
  - Wynn’s Anti-Corruption Policy
- Anti-Harassment
- Anti-Discrimination

In addition, Wynn provides internal annual training for similar compliance topics as outlined below:

- Responsible gaming eLearning training for all table game and slot employees twice a year
- Anti-money laundering eLearning training for all table game employees annually
- Anti-money laundering eLearning for cage cashiers and supervisors twice a year



## **MANAGEMENT ANTI-CORRUPTION TRAINING**

It is our strict policy to compete fairly and on the basis of our superior service. We therefore operate ethically and prohibit the bribery of government officials. We conduct background checks on all prospective employees prior to their employment. Our employees are also required to adhere to our Code, which requires, among other things, that they act with integrity and honesty. We offer regular anti-corruption compliance training programs to educate employees, officers, directors, agents, consultants and representatives of the Company about the requirements and obligations of the Anti-corruption Laws and our policy.

All employees are required to annually certify in writing that they have read, understood, have not violated and will not violate our Code.

An integrity hotline and dedicated email are hosted by an independent third party to facilitate the anonymous reporting of any suspected illegal, criminal, or inappropriate activity.

## **ANTI-MONEY LAUNDERING**

We have a zero-tolerance approach to money laundering (AML). Wynn has in place a suite of policies relating to money laundering and the financing of terrorism. The Wynn AML Committee functions independently and ensures all relevant Wynn operational divisions apply these policies and act in compliance with Macau law and in accordance with our company-wide culture of compliance.

To prevent and detect suspicious financial activity, we conduct anti-money laundering training and testing of all staff prior to commencing employment and annually thereafter. We also perform internal audits on a regular basis.

## **RESPONSIBLE GAMING**

We have always recognized the importance of responsible gaming and we are committed to supporting responsible gaming initiatives. To that end we work closely with the Macau Gaming Inspection and Coordination Bureau, the Macau Social Welfare Bureau, the Institute for the Study of Commercial Gaming of the University of Macau, and non-governmental organizations to formulate and implement best practices for promoting responsible gaming.

We promote responsible gaming by raising awareness around our facilities through written material regarding the nature and symptoms of problem gaming<sup>1</sup>. We have also established procedures and training for staff who interact with casino customers and we provide support and resources to prevent problem gaming where applicable.

Responsible gaming is also one of the eight pillars of our Community and Government Relations Department which conducts regular responsible gaming roadshows and training for our employees.

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<sup>1</sup>Problem gaming is defined as gambling that causes disruptions in any major area of life: psychological, physical, social, or vocational



## **POLITICAL CONTRIBUTIONS**

Wynn has in place a policy covering political contributions which is explicitly communicated to staff in annual training sessions. Key elements of the policy include:

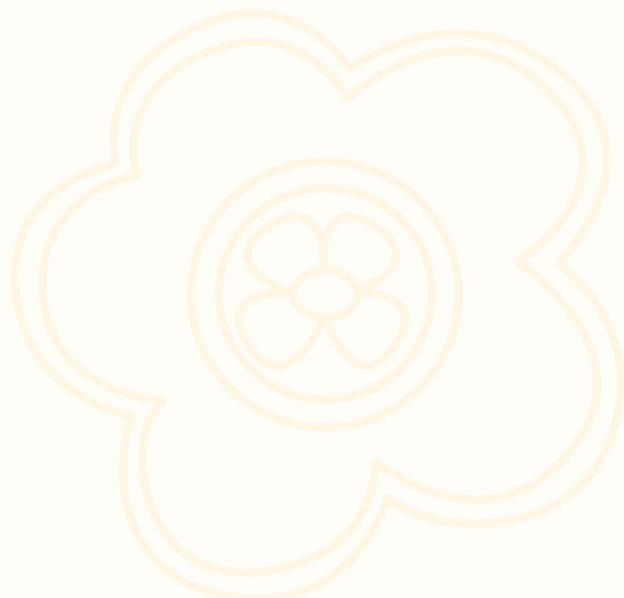
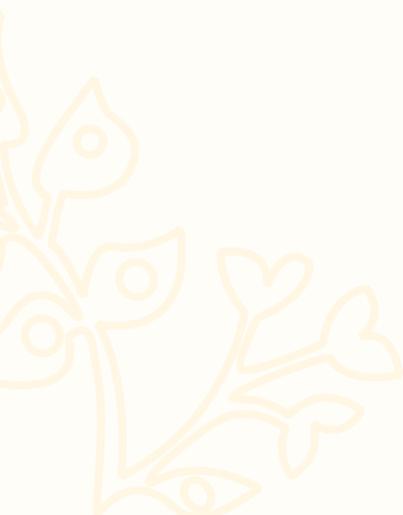
- Political contributions must not be made by or on behalf of the Company
- Political contributions could potentially expose Wynn and its employees to corruption issues
- Political contributions include:
  - Donations to any political party, candidate, or campaign
  - The use of Wynn's services or facilities for any political party or candidate
  - Lobbying activities
  - Endorsements or sponsorships

## **CUSTOMER PRIVACY**

Our customers are our number one priority, and when it comes to customer privacy, we take every measure to ensure that customer's interests are protected. We have extensive policies, procedures, and practices to ensure compliance with relevant government laws and regulations, and credit card industry standards which protect the privacy and confidentiality of relevant information including personal data. Access to customer data is limited to designated authorized employees and these employees have an obligation to respect all customer privacy protocols.

## **KEY POLICIES INFORMING OUR SUSTAINABILITY PRINCIPLES:**

- Code of Business Conduct and Ethics
- Code of Personal Conduct
- Equal Opportunity and Non-Discrimination
- Preventing Harassment and Discrimination
- Human Capital Development
- Occupational Health & Safety
- Anti-Corruption
- Information Security Governance
- Responsible Gaming
- Anti-Money Laundering (AML)



# Appendix

Our described approaches to the topics relevant to our Sustainability Principles include but are not limited to:

TOPIC	POLICY/PRINCIPLE	DETAILS
Anti-corruption	Policy	Sustainability Principles > Compliance
Anti-money laundering	Policy	Sustainability Principles > Compliance
Business ethics	Policy	Sustainability Principles > Social Principles
Community investment	Principle	Sustainability Principles > Community involvement
Discrimination	Policy	Sustainability Principles > Social Principles
Diversity	Policy	Sustainability Principles > Social Principles
Equal Opportunity	Policy	Sustainability Principles > Social Principles
Occupational health and safety	Policy	Sustainability Principles > Social Principles
Political Involvement	Principle	Sustainability Principles > Compliance
Prevention of child and forced labor	Principle	Sustainability Principles > Social Principles
Responsible gaming	Policy	Sustainability Principles > Compliance
Salary and Benefits	Policy	Sustainability Principles > Social Principles
Staff code of conduct	Policy	Sustainability Principles > Social Principles
Supplier standards (environmental)	Principle	Sustainability Principles > Socio-Economic Commitment
Supplier standards (social)	Principle	Sustainability Principles > Socio-Economic Commitment
Whistleblowing	Policy	Sustainability Principles > Social Principles
Working conditions	Principle	Sustainability Principles > Social Principles

Further details on how our policies and Sustainability Principles are operationalized can be found in the WML Sustainability Report.