



## CODE OF BUSINESS CONDUCT AND ETHICS

### I. Introduction

#### A. *Purpose*

This Code of Business Conduct and Ethics (the “**Code**”) was adopted by the Board of Directors (the “**Board**”) of Melco Resorts & Entertainment Limited (“**Melco**”).

This Code contains general guidelines for conducting the business of Melco and its subsidiaries consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, we will adhere to these higher standards.

This Code applies to all of the directors, officers, employees, agents and subcontractors of Melco and its subsidiaries (except as referred to below as it relates to Listed Sub), which, unless the context otherwise requires, are collectively referred to as the “**Company**” in this Code. We refer to all persons covered by this Code as “**Company Representatives**”. All references to “you” shall be references to the Company Representatives. We also refer to our Chief Executive Officer, our Chief Financial Officer, and the heads of our business units as our “principal officers”.

To the extent that a subsidiary of Melco is separately listed on a stock exchange (a “**Listed Sub**”) and has a separate “code of business conduct and ethics” in effect as approved by its board of directors and endorsed by the Nominating and Corporate Governance Committee (“**NCGC**”) of the Board, the relevant persons of the Listed Sub and its subsidiaries (who are not otherwise directors, officers and employees of the Company) should be subject to the Listed Sub’s own code of business conduct and ethics in lieu of this Code, unless otherwise required by Melco, the Listed Sub or applicable law.

#### B. *Seeking Help and Information*

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have a question or concern about an ethical or compliance-related issue or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact the Human Resources Department and/or the Ethical Business Adviser (the “**EBA**”) or the Ethical Business Liaison Officer (“**EBLO**”), if applicable, for help.

C. *Reporting Violations of this Code*

*All Company Representatives have a duty to report any known or suspected violation of this Code, including any violation of the laws, rules, regulations or policies that apply to the Company. If you know of or suspect a violation of this Code, promptly report the conduct to your supervisor, who will work with you to investigate your concern or direct your concern to the appropriate department within the Company. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact your supervisor, the Human Resources Department, the EBA or EBLO, any Company Counsel, Internal Audit, Investigations, Finance or any member of management or submit your complaint to our hotline or via email set up under our Procedures for Handling Complaints and Whistleblowing. All reports of known or suspected violations of applicable laws or this Code will be handled sensitively and with appropriate confidentiality. The Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern.*

*This Code will be enforced on a uniform basis for everyone, without regard to their position within the Company. It is Company policy that any individuals who violate this Code will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation. An individual accused of violating this Code will be given an opportunity to present his or her version of the events at issue prior to any determination of appropriate discipline. Individuals who violate any applicable law or this Code may become subject to civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. If your conduct as a representative of the Company does not comply with applicable laws or with this Code, it may result in serious consequences for both you and the Company. Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.*

D. *Policy Against Retaliation*

In no event will there be any retaliation against someone for reporting an activity that he or she in good faith believes to be a violation of any law, rule or regulation or this Code. Any supervisor or other employee intimidating or imposing sanctions on a Company Representative for reporting a matter will be disciplined, which may include termination of employment.

It is against the law to retaliate against a person, including with respect to their employment, for providing information that the person reasonably believes to be true to a law enforcement officer relating to the possible commission of any violation of law. Company Representatives who believe that they have been retaliated against by the Company, its employees, contractors, subcontractors or agents, for providing information to or assisting in an investigation conducted by a governmental authority or a person in a supervisory role (or another person who has the authority to investigate or terminate misconduct) in connection with

conduct that the employee reasonably believes constitutes a violation of rule or law, may seek redress through governmental agencies.

It is important to note that our policy against retaliation is to protect Company Representatives engaging in responsible reporting of activities that they, in good faith, believe are in violation of company policies or legal rules and regulations. However, it is equally important for the Company to safeguard our Company Representatives from malicious accusations based on unfounded information, which the person reporting the activity knows is untrue. A Company Representative who files a report against another employee knowing that the report contains false information or allegations will be subject to internal review and appropriate discipline.

*E. Waivers of this Code*

Waivers or exceptions to our Code will be granted only in advance and only under limited and exceptional circumstances. Waivers of this Code for employees may be made only by an executive officer of the Company. Any waiver of this Code for our directors, executive officers or other principal officers may be made only by the Board and will be disclosed to the public as may be required by applicable laws or the rules of the Nasdaq. In determining whether or not any waiver of the provisions of this Code is required to be disclosed, please refer to the Company's Guidelines for Corporate Communication and on Disclosure Controls and Procedures. In case of doubt, please consult the Legal Department for guidance.

## **II. Internal and External Dealings**

*A. Patrons*

The Company seeks to provide excellent service to all third parties (“**patrons**”) with whom it conducts business. To this end, the Company Representatives should abide by the following principles.

- Act appropriately and in good faith in his or her dealings with the Company's patrons.
- Respect the views of the Company's patrons, including suggestions and requests made by the patrons concerning services offered by the Company. Moreover, the Company shall seek to address all customer complaints promptly and fairly.
- Provide the Company's patrons with facts concerning the services offered by the Company that the Company deems appropriate for the patrons to be aware of.

The Company Representatives shall maintain the confidentiality of information entrusted to them by the Company or its patrons, except when disclosure is duly authorized or legally mandated. Confidential information includes all non-

public information that may be of use to the Company's competitors, or harmful to the Company or its patrons, if disclosed.

*B. Shareholders*

The Company shall endeavor to maximize shareholder value. The Company Representatives shall implement the following principles.

- Seek to maximize shareholder value by achieving profitability through sound management.
- Respect the rights of the Company's shareholders, including the right to obtain adequate access to information which the Company is required by law to disclose. Disclosure about the Company's affairs, operations and financial condition shall be made in accordance with the Company's Guidelines for Corporate Communications and Continuous Disclosure and Disclosure Controls and Procedures.

*C. Employment Practices and Workplace Health and Safety*

The Company seeks to create a workplace environment that is harmonious, respectful of the rights of all Company Representatives, and conducive to attaining excellence in the quality of service provided to the Company's patrons. The Company Representatives should respect each other as a member of the same community, and should endeavor to create and maintain a harmonious corporate culture. To achieve this objective, the following principles should be implemented at all times.

- The Company is committed to providing a workplace free of discrimination, harassment and bullying.
- The Company shall not engage in any discriminatory employment practice, which is not in compliance with applicable laws.
- Sexual harassment is strictly prohibited on the part of the Company Representatives as well as any party providing services to the Company, including temporary workers, independent contractors or other professional service providers of the Company.
- Decisions regarding employees shall be made taking into consideration all relevant factors such as market conditions, business requirements and performance of the Company as well as other relevant factors such as performance, capability, effort and degree of contribution made by the employees concerned.
- The Company is committed to the health and safety of its Company Representatives, patrons and partners. Each Company Representative has a responsibility to understand and comply with all applicable health and safety laws and guidelines and Company policies, and to identify and report health and safety hazards and security concerns.

*D. Competitors and Business Partners*

The Company prides itself on being a responsible corporate citizen. The Company should continue to abide by the following principles.

- The Company strives to respect its competitors and compete fairly and honestly with them. The Company shall not seek any competitive advantage obtained through unethical or illegal means.
- The Company should not take unfair advantage of any person through concealment, manipulation or abuse of privileged information, misrepresentation of material facts or any unfair business practice.

*E. Human Rights*

The Company is committed to respecting and protecting human rights and the dignity of our employees and those employed in our supply chain. All Company Representatives, contractors, business partners and suppliers are expected to show respect for all rights enshrined in the Universal Declaration of Human Rights and comply with applicable laws and regulations, including, without limitation, local labor and employment laws.

The Company has a zero-tolerance policy against human rights abuse of any kind and aims to ensure that workplaces are free of discrimination and harassment, including verbal, physical, visual or sexual discrimination or abuse. The Company prohibits child labor and involuntary or forced labor of any kind, including prison labor, indentured labor, bonded labor, military or slave labor, or any form of human trafficking.

*F. Diversity, Equity and Inclusion*

The Company is committed to promoting workplace diversity, equity and inclusion (“**DE&I**”) so as to create a harmonious work environment in furtherance of the sustainability of our business. Since the Company serves patrons from numerous parts of the world, it is important for the Company to ensure its workforce reflects that diversity and that its workplace is inclusive and bias-free. The Company takes pride in being recognized as an equal opportunity employer and has a zero tolerance policy for any form of discrimination or harassment based on gender, age, race, religion, gender identity, sexual orientation, varying ability, parental/marital status, or other non-meritocratic factors.

The Company’s management is responsible for identifying DE&I related risks and opportunities and recommending suitable DE&I initiatives, policies and programs to the Board for approval. Any DE&I initiatives, policies and programs approved by the Board will be implemented or administered by multiple functions (including human resources) under guidelines and procedures recommended by the Chief of Staff to the Chairman and CEO.

### III. Conflicts of Interest

#### A. *Identifying Potential Conflicts of Interest*

A conflict of interest can occur when a Company Representative's private interest interferes, or appears to interfere, with the interests of the Company as a whole. Such conflicts of interest can undermine our business judgment, objectivity and our responsibility to the Company and threaten the Company's business and reputation. Accordingly, all apparent, potential, and actual conflicts of interest should be avoided, and any transactions between a Company Representative and the Company that involve a potential conflict of interest should only be entered into after you have disclosed the transaction and have received the appropriate approval. All requests for such approvals should be referred to the Human Resources Department.

Identifying potential conflicts of interest may not always be clear-cut. The following situations are examples of potential conflicts of interest:

- Outside Employment. All employees are bound by our employment contracts to devote all their working time to the Company, hence, no employee should be employed by, serve as a company director of, or provide any services to any outside party without the Company's consent, and especially where that party is a material customer or supplier to, or any competitor of, the Company.
- Improper Personal Benefits. No Company Representatives should obtain any material (as to him or her) personal benefits or favors because of his or her position with the Company. Please see "Gifts and Entertainment" below for additional guidelines in this area.
- Personal Interests. No Company Representative shall have a direct or indirect personal interest in a transaction involving the Company, except when the interest has been fully disclosed to and approved by the Company.
- Financial Interests. No Company Representative should have a financial interest (ownership or otherwise) in any company that is a material customer, supplier or competitor of the Company, except when the interest has been fully disclosed to and approved by the Company. However, it is not typically considered a conflict of interest (and therefore, prior approval is not required) to have an interest of less than 1% of the outstanding shares of a publicly traded company.
- Loans or Other Financial Transactions. No Company Representative should obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, the Company or any company that is a material customer or supplier to, or any competitor of, the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.

- Service on Boards and Committees. No Company Representative should serve on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence a Company Representative's objectivity in making decisions on behalf of the Company. For purposes of this Code, "family members" include your spouse or life-partner, brothers, sisters and parents, in-laws and children whether such relationships are by blood or adoption. Please see "Family Members Working in the Industry" below for additional guidelines in this area.
- Outside Activity. No Company Representative shall engage in any outside activity (including any paid or unpaid appointment, employment or engagement of whatever type) that materially detracts from or interferes with the performance of his or her services to the Company.
- Personal Conduct. In their dealings with internal parties (such as other employees, officers and directors of the Company) and external parties (such as patrons or employees, officers, directors, contractors and shareholders of customers, suppliers, vendors and investors), Company Representatives should conduct themselves in accordance with our community's standards of integrity, honesty and good morals and should avoid any act involving moral turpitude or any act that may adversely affect the image or reputation of the Company.

For purposes of this Code, a customer is a "material" customer if such customer has made payments to the Company in the past year in excess of US\$200,000 or 5% of the customer's gross revenues, whichever is greater. A supplier is a "material" supplier if such supplier has received payments from the Company in the past year in excess of US\$200,000 or 5% of the supplier's gross revenues, whichever is greater. A competitor is a "material" competitor if such competitor competes in the Company's line of business and has annual gross revenues from such line of business in excess of US\$10,000,000. For purposes of this Code, Melco International Development Limited and its subsidiaries are not considered to be "material" competitors, suppliers or patrons.

#### *B. Disclosure of Conflicts of Interest*

The Company requires that Company Representatives disclose any situations that reasonably would be expected to give rise to a conflict of interest. If you suspect that you may have a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it to the Human Resources Department. The Human Resources Department will work with you to determine whether you have a conflict of interest, or will direct your report to the appropriate department in the Company, and, if a conflict is determined to exist, you will be assisted in determining how best to address the conflict.

Conflicts of interest are not automatically prohibited, and in many cases can be avoided or resolved if they are disclosed and appropriate steps are taken to manage the conflict or appearance of conflict. If a significant conflict exists and cannot be resolved, the Code may only be waived in limited and exceptional circumstances, as described in “Waivers of this Code” above.

*C. Family Members Working in the Industry*

You may find yourself in a situation where (i) your Family Member is a competitor, supplier, guest, patron, visitor or tenant of the Company or is employed by one or (ii) your Family Member is also employed by the Company. Such situations are not prohibited, but they call for extra sensitivity to security, confidentiality and potential conflicts of interest.

There are several factors to consider in assessing such a situation, including the relationship between the Company and the other person or company; the nature of your responsibilities at the Company and those of the other person or company; and the access each of you has to confidential information of the Company or of the other person or company. Such a situation, however harmless it may appear to you, could arouse suspicions among your colleagues that might affect your working relationships. The very appearance of a conflict of interest can create problems, regardless of the propriety of your behavior.

To remove any such doubts or suspicions, you must disclose your specific situation to the Human Resources Department to assess the nature and extent of any concern and how it can be resolved. In some instances, any risk to the Company’s interests is sufficiently remote that the Human Resources Department may only remind you to guard against inadvertently disclosing Company confidential information and not to be involved in decisions on behalf of the Company that involve the other person.

*D. Presence in Gaming Areas*

In general, employees of the Company’s gaming operations may only enter the gaming areas operated by the Company in the course of their normal work activities. Employees should refer to and strictly comply with the policies of the relevant business units related to access to gaming areas. Employees of non-gaming operations and their guests may enter gaming areas operated by the Company but they may not engage in gaming activities in such venues.

**IV. Gifts and Entertainment**

The giving and receiving of gifts is a worthwhile and acceptable business practice when performed within the boundaries set forth by this Code and applicable laws and regulations. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. However, gifts and entertainment should not compromise, or appear to compromise, your ability to make objective and fair business decisions.

When you are providing a gift, entertainment or other accommodation in connection with Company business, you must do so in a manner that is in good taste and without excessive expense. Except for complimentary goods and services customarily provided to patrons in the ordinary course of the Company's business, you may not furnish or offer to furnish any gift that is of more than token value or that goes beyond the common courtesies associated with accepted business practices. You should follow the below guidelines, and the specific policy that the Company or the Human Resources Department may from time to time prescribe for giving or receiving gifts, in determining when it is appropriate to give or receive gifts and when prior written approval from the Human Resources Department is required. It is your obligation to observe and comply with such guidelines and policy and seek the required approval in all situations including in the specific examples given in A to E of this section.

You must be particularly sensitive in considering a gift or entertainment for an official, as such expenditures are subject to strict rules and regulations under the laws of the United States, the Macau Special Administrative Region and the Hong Kong Special Administrative Region of the People's Republic of China, the Philippines, Cyprus, Taiwan, Japan, Sri Lanka and other jurisdictions where the Company operates. As described in Section VIII.B of this Code, any expenditures or benefits conferred upon officials must comply with the requirements of the U.S. Foreign Corrupt Practices Act (the "FCPA") under the U.S. rules and the anti-corruption laws of other relevant jurisdictions.<sup>1</sup> A gift or entertainment that may be construed as a bribe, kickback or other improper payment may not be given under any circumstances. You are referred to the Company's Ethical Business Practice Program ("EBPP") and related guidelines for additional information regarding requirements of the FCPA as well as anti-corruption guidelines setting out applicable local laws and custom in various jurisdictions in which the Company may operate (the "**Anti-Corruption Guidelines**").

Our suppliers and tenants likely have gift and entertainment policies of their own. You must be careful never to provide a gift or entertainment that you know violates or could violate any counterparty's gift and entertainment policy.

It is your responsibility to use good judgment in this area. As a general rule, you may give or receive gifts or entertainment to or from patrons or suppliers, who do not meet the definition of an official, only if the value of such gift or entertainment is not excessive and such gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. All gifts and entertainment expenses should be accurately accounted for and documented on expense reports, including the nature and purpose of the expenditure. The following specific examples may be helpful:

A. *Meals and Entertainment.* You may occasionally accept or give meals,

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<sup>1</sup> Such anti-corruption laws include but are not limited to the (a) Prevention of Bribery Ordinance (Chapter 201 of the Laws of Hong Kong) under the Hong Kong rules, (b) Law no. 19/2009 on the Prevention and Suppression of Bribery in the Private Sector, Articles 337 to 339 of the Macau Criminal Code and Law no. 10/2014 The System for the Prevention and Suppression of Corrupt Practices in Foreign Trade, under the Macau rules, (c) Anti-Graft and Corrupt Practices Act, the Revised Penal Code and the Code of Conduct and Ethical Standards for Public Officials and Employees under the Philippine rules, and (d) the Anti-Corruption Act No. 9 of 2023 of Sri Lanka.

refreshments or other entertainment if:

- The items are of reasonable value;
- The purpose of the meeting or attendance at the event is business related; and
- The expenses would be paid by the Company as a reasonable business expense if not paid for by another party.

Entertainment of reasonable value may include food and tickets for sporting and cultural events if they are generally offered to other patrons, suppliers or vendors.

Subject to further restrictions and requirements as may be specified in the Company's Anti-Corruption Guidelines, any gifts or entertainment for Officials above HKD/MOP1,500 (or the equivalent in other currency, the "Gift Limit") must be pre-approved before the gift or entertainment is provided or received by your supervisor who is to first consult with the EBA before granting approval. If any unplanned gift and/or entertainment expense above the Gift Limit is incurred (without the necessary pre-approval set forth above due to the unavailability of your supervisor and EBA), you must submit a report, detailing the circumstances of the gift / entertainment provided and the expense incurred, to your supervisor and the EBA and take any other appropriate action following discussions with your supervisor and the Company's EBLO. To avoid the perception that gifts or entertainment for officials may be inappropriately given, employees should avoid giving gifts or entertainment on a frequent basis to any given government official, in particular, if the value of such gifts or entertainment is above the Gift Limit. When calculating the cost of entertainment for officials, the total cost of the event is subject to the Gift Limit (*e.g.*, the combined expense of tickets, food, beverages and travel that exceeds the Gift Limit must be pre-approved). The gift limit for festive seasons may be higher than the Gift Limit specified above. From time to time, the Company may issue (a) special guidelines for gift giving during special festive seasons when gift giving is practiced according to local custom and/or (b) Anti-Corruption Guidelines setting out local laws and custom that may be applicable to gift giving or entertainment for officials in the relevant jurisdiction. Please consult such special guidelines (including "*Guidelines on Festive Gift Giving to Government Officials*") and Anti-Corruption Guidelines that may be authorized to be issued by the Chief Executive Officer from time to time.

- B. Advertising and Promotional Materials.* You may occasionally accept or give advertising or promotional materials of nominal value.
- C. Personal Gifts.* You may accept or give personal gifts of reasonable value that are related to recognized special occasions such as a cultural event, celebration or holiday (for example, Chinese New Year, Christmas, Mid-Autumn Festival and Chung Yeung Festival). A gift is also acceptable if it is based on a family or personal relationship and unrelated to the business between individuals. If you are unsure whether a gift is acceptable, please report the receipt of the gift

to the EBA or EBLO for further guidance. Please also consult special guidelines regarding gift giving and Anti-Corruption Guidelines that may be authorized to be issued by the Chief Executive Officer from time to time.

- D. *Gifts Rewarding Service or Accomplishment.* You may accept a gift from a civic, charitable or religious organization specifically related to your service or accomplishment.
- E. *Travel.* Any gift that involves regional or international travel shall only be accepted after clearance from the Chief Executive Officer via the Executive Vice President and Chief of Staff to the Chairman and CEO.

These guidelines do not prohibit authorized employees in designated job categories from accepting traditional customer gratuities (“**tips**”).

In addition to complying with the above guidelines and the policy issued by the Company or the Human Resources Department referred to in this section, you should make every effort to refuse or return a gift that is beyond the permissible guidelines. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should forward the gift to the Human Resources Department in accordance with the Gift Policy. The Human Resources Department will bring the gift to the attention of the EBA and the gift may be donated to an appropriate community organization or other causes or otherwise disposed of in an appropriate manner.

If you provide any gift, entertainment or other accommodation in connection with the Company’s business, you must do so in a manner that is in good taste, without excessive expense and in strict compliance with applicable laws. In particular, Company Representatives should be aware that Macau civil servants have a duty to report the acceptance of any gifts of whatever value to their superiors. In the event the gifts accepted are found to be a direct or indirect advantage to such civil servant, the Company and the Company Representatives may be subject to criminal prosecution and the Company Representative may be subject to disciplinary action, up to and including termination of employment.

## **V. Confidential, Proprietary Information**

One of the Company’s most valuable assets is information. Company Representatives should maintain the confidentiality of information (whether or not it is considered proprietary) entrusted to them not only by the Company, but also by suppliers, patrons and others related to our business. Confidential information includes all non-public information that might be of use to our competitors or harmful to the Company, or its patrons or suppliers, if disclosed. Examples of confidential information include trade secrets, new product or marketing plans, customer lists, research and development ideas, manufacturing processes, or acquisition or divestiture prospects.

Company Representatives should take steps to safeguard confidential information by keeping such information secure, limiting access to such information to those employees who have a “need to know” in order to do their job, and avoiding discussion of confidential information in public areas, for example, in elevators, on planes, and on mobile phones.

Confidential information may be disclosed to others when disclosure is authorized by the Company or legally mandated. The obligation to preserve confidential information is ongoing, even after termination of employment.

## **VI. Company Records**

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our business decision-making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, e-mails, meeting minutes, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. You are responsible for understanding and complying with our record retention policy.

## **VII. Accuracy of Financial Reports and Other Public Communications**

As a public company we are subject to various securities laws, regulations and reporting obligations. These laws, regulations and obligations and our policies require the timely disclosure of accurate and complete information regarding the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's principal officers and other employees working in the Finance Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts. This policy applies to all public disclosure of material information about the Company, including written disclosures, oral statements, visual presentations, press conferences and media calls. Please read the Company's Disclosure Controls and Procedures and Guidelines for Corporate Communication and Continuous Disclosure for more information.

In addition, U.S. federal securities law requires the Company to maintain accurate internal books and records and to devise and maintain an adequate system of internal accounting controls. The Securities and Exchange Commission ("SEC") has supplemented the statutory requirements by adopting rules that can impose liability on the Company for any inaccuracies in its books and records, even if not material and even if inadvertent. In addition, individuals can be liable for (1) falsifying records or accounts subject to the above requirements and (2) making any materially false, misleading, or incomplete statement to an accountant in connection with an audit or any filing with the SEC. These provisions reflect the SEC's intent to discourage officers, directors, and other persons with access to the Company's books and records from

taking action that might result in the communication of materially misleading financial information to the investing public.

## **VIII. Compliance with Laws, Rules and Regulations**

Each Company Representative has an obligation to comply with all laws, rules and regulations applicable to the Company's business. These include, but are not limited to, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information and misuse of corporate assets. These laws also include foreign laws and require our employees to report any event that may affect the suitability of our foreign subsidiary as a licensed gaming operator, or its direct or indirect shareholders, directors or employees, to conduct a gaming business in that jurisdiction, and to provide all information required by the local gaming regulators pursuant to their supervisory authority of our gaming business in the jurisdiction. Any such required report by regulatory authorities should be first communicated to the Human Resources Department unless the law specifically requires confidentiality from the employee.

You are expected to understand and comply with all laws, rules and regulations that apply to your job or position with the Company. It is the Company's policy to abide by the national and local laws of our host nations and communities. The fact that in some countries certain standards of conduct are legally prohibited, but these prohibitions are not enforced in practice, or their violation is not subject to public criticism or censure, will not excuse any illegal action .

### *A. Compliance with Insider Trading Laws*

Company Representatives are prohibited from trading in the stock or other securities of the Company while in possession of material nonpublic information about the Company. In addition, Company Representatives are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell stock or other securities of the Company on the basis of material non-public information. Company Representatives who obtain material nonpublic information about another company in the course of their employment or position with the Company are prohibited from trading in the stock or securities of the other company while in possession of such information or "tipping" others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment.

Please refer to the Company's Policy for the Prevention of Insider Trading for more information.

### *B. Anti-Corruption laws*

Various jurisdictions in which the Company is operating or developing its business have specific anti-corruption laws (collectively, the "**Anti-Corruption**

**Laws” or “ACL”).** In addition to the compliance with the ACL by the operating entity or the Company’s local business, the employees of the entity or business are also required to observe the ACL. Any violation of the ACL by such entity or employees may affect not only the entity or the employees, as the Company and its directors and management may also have potential liability. Generally, the ACL cover domestic corruption in public and private sectors but in some jurisdictions, the laws extend to corrupt practices of foreign public officials.

Please refer to the EBPP for the Company’s policy on anti-corruption.

*C. Anti-Corruption Guidelines*

The Chief Executive Officer may authorize the issuance of Anti-Corruption Guidelines, from time to time, which set out the relevant local laws and custom relating to anti-corruption practices in various jurisdictions in which the Company operates. The Company has zero tolerance for bribery and corruption. Please consult the Anti-Corruption Guidelines for restrictions and requirements that may be applicable in various jurisdictions in which the Company operates.

*D. Compliance with Laws against Money Laundering, Terrorist Financing and Proliferation Financing*

The Company is committed to operating lawfully and ethically and expects all Company Representatives and third parties acting on the Company’s behalf to conduct all aspects of their business with integrity and in compliance with all applicable laws, including financial crime laws. Company Representatives are prohibited from engaging in any efforts that facilitate money laundering or terrorist financing, whether conducted directly or indirectly through a third party, and Company Representatives must always seek to conduct business only with persons and entities that are engaged in legitimate and lawful business activity.

The Company has put in place due diligence processes that include checking reputable databases to know its Company Representatives and third parties the Company does business with, including patrons, suppliers, and vendors. These due diligence processes include verifying that such parties are not subject to sanctions pronounced by relevant authorities and that whether such parties are politically exposed persons. Company Representatives responsible for conducting this due diligence are required to follow the Company’s established due diligence procedures. Caution must be exercised in dealing with third parties who are identified as politically exposed persons, whether foreign or domestic, and Company Representatives shall follow such guidelines in respect of politically exposed persons as specified in the Company’s anti-money laundering policy applicable to their jurisdiction, which include, without limitation, the requirement of having senior management’s approval and continuous monitoring of any business dealings with politically exposed persons.

Violation of laws against money laundering and terrorist financing can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment. In addition,

Company Representatives should comply with the Company's Corporate Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation Financing Policy.

## **IX. Fair Dealing**

The Company's success depends on building productive relationships with one another and third parties based on honesty, integrity, ethical behavior and mutual trust. Every Company Representative should endeavor to deal fairly with each of our patrons, suppliers, competitors and other employees. No Company Representative should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.

## **X. Protection and Proper Use of Assets**

Proper and efficient use of Company, supplier, customer and other third-party assets, such as electronic communication systems, information (proprietary or otherwise), material, facilities and equipment, as well as intangible assets, is each employee's responsibility. Company Representatives must not use such assets for personal profit for themselves or others. In addition, Company Representatives must act in a manner to protect such assets from loss, damage, misuse, theft, removal and waste. Finally, employees must ensure that such assets are used only for legitimate business purposes. However, in limited instances, Company assets may be used for other purposes approved by management

## **XI. Certification**

Every director, officer and employee of the Company is required to certify his or her compliance with this Code when he or she joins the Company, and thereafter on annual basis, by completing the "Certification of Compliance" attached as the Schedule to this Code.

## **XII. Conclusion**

This Code of Business Conduct and Ethics contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact the Human Resources Department. We expect all individuals to adhere to these standards.

This Code of Business Conduct and Ethics shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code does not in any way constitute an employment contract or an assurance of continued employment. It is for the sole and exclusive benefit of the Company and may not be used or relied upon by any other party. The Company may modify or repeal the provisions of this Code or adopt a new Code at any time it deems appropriate, with or without notice.

### **XIII. Code Review**

After the initial approval of this Code by the Board, the NCGC has been delegated authority and responsibility from the Board to review and approve amendments to this Code, when and where appropriate, in order to ensure its effectiveness. Upon any approval of an amendment of this Code, the NCGC shall report such approval and amendment to the Board.

### **XIV. Related Policies**

Please ensure that when complying with this Policy you also comply with all relevant policies and guidelines, including but not limited to:

- Gift Policy
- Guidelines on Festive Gift Giving to Government Officials
- Ethical Business Practices Program
- Policy for the Prevention of Insider Trading
- Document Retention Policy
- Corporate Anti-Money Laundering and Counter-Terrorist Financing Policy

## Issue No. 18

**Approved by:** Nominating and Corporate Governance Committee

**Approval Date:** December 2, 2025

Certified to be a true copy by Senior Vice President, Group Corporate General Counsel

Signature :  [Signed by Tim Sung]

### REVISION HISTORY

| ISSUE | DATE APPROVED      | APPROVED BY | PAGES REVISED                               | WORD                  | EXECUTED PDF        |
|-------|--------------------|-------------|---|-----------------------|---------------------|
| 5     | November 1, 2010   | NCGC        | 1, 3, 6, 7, 8, 10, 11 & 12                  |                       |                     |
| 6     | September 29, 2011 | NCGC        | N/A   |                       |                     |
| 6     | November 27, 2012  | NCGC        | N/A   |                       |                     |
| 7     | December 3, 2013   | NCGC        | 1, 2, 3, 5, 6, 7, 8, 9, 11, 12, 13, 14 & 15 |                       |                     |
| 8     | December 1, 2014   | NCGC        | 1, 4, 7, 8, 9, 11 & 15                      |                       |                     |
| 9     | May 19, 2015       | NCGC        | 1, 6, 8, 9, 10, 12, 13 & 14                 |                       |                     |
| 10    | February 18, 2016  | NCGC        | 1, 5, 6 & 15                                |                       |                     |
| 11    | March 17, 2017     | NCGC        | 1, 5, 9-11, 13-17                           | HK/0025738v8.7        | 3463-2630-1704, v.1 |
| 12    | August 21, 2017    | NCGC        | 1, 4 & 7                                    | HK/0025738v9.4        | 3457-4371-1754, v.1 |
| 13    | December 4, 2019   | NCGC        | 1-10, 12-16                                 | 3455-0883-0730, v. 5  | 3471-7111-8606, v.3 |
| 14    | December 1, 2020   | NCGC        | All   | 3462-2063-1825, v. 12 | 3447-6940-7506, v.2 |
| 15    | November 24, 2021  | NCGC        | 1-2, 5, 10-11, 14-17                        | 3468-4814-3638, v. 8  | 3458-8072-3223, v.2 |
| 16    | May 8, 2023        | NCGC        | 5, 6 & 16                                   | 3468-4814-3638, v. 10 | 3458-8072-3223, v.4 |
| 17    | December 3, 2024   | NCGC        | 1-6, 8-12, 14-16                            | 3468-4814-3638, v. 16 | 3458-8072-3223, v.6 |
| 18    | December 2, 2025   | NCGC        | 2, 9  | 3468-4814-3638, v. 21 | 3458-8072-3223, v.8 |

**SCHEDULE**

**CERTIFICATION OF COMPLIANCE**

I have received and reviewed the Company’s Code of Business Conduct and Ethics (as amended by the Company from time to time) (the “Code”), and I understand the Code. I hereby undertake, as a condition to my present and continued employment at or affiliation with the Company (as defined in the Code), to comply fully with the Code and all the policies and procedures referred to therein.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
NAME

\_\_\_\_\_  
POSITION