



# Wynn Macau, Limited

*(Incorporated in the Cayman Islands with Limited Liability)*

## Supplier Code of Conduct

Adopted on 28<sup>th</sup> November 2025

### 1. INTRODUCTION

- 1.1. Wynn Macau, Limited (the “Company”) is a developer, owner, and operator of two integrated destination casino resorts, Wynn Palace and Wynn Macau, located in the Macau Special Administrative Region of the People’s Republic of China. The Company and its subsidiaries (together the “Group”) are dedicated to fostering responsible business practices throughout its supply chain.
- 1.2. This Supplier Code of Conduct (the “SCC”) outlines the fundamental principles and standards that the Group’s suppliers, sub-suppliers, manufacturers, contracted parties, service providers, and/ or business partners (the “Third Parties”) are required to follow, ensuring that their operations align with the Group’s core values. Compliance with the SCC, which may be amended periodically at the Group’s sole discretion, is essential to allow engagement, maintain and progressively build a business relationship with the Group. By adhering to the SCC, Third Parties demonstrate their commitment to operating with integrity and supporting the Group’s broader sustainability objectives.

### 2. SCOPE

Any business or service carried out by the Third Parties must comply with the SCC and uphold the standards of legal, ethics, human rights and labor guidance, occupational health and safety requirements, environmental stewardship, and social responsibility outlined in this document, regardless of location.

### 3. LEGAL COMPLIANCE

- 3.1. The Third Parties must operate in full compliance with all applicable laws, regulations, rules, instructions, and industry standards in the jurisdictions in which the Third Parties or the Group conduct business, as well as the broader standards required by international conventions. This includes but is not limited to regulations concerning environmental protection, labor laws, health & safety, anti-corruption, and data protection:
  - a) Third Parties shall be in full compliance with laws related to environmental management, occupational health & safety, minimum wage, overtime regulations, anti-bribery laws, and any laws preventing force labor or human trafficking.
  - b) Third Parties shall have systems, mechanisms, processes, procedures and rules in place to ensure oversight, ongoing compliance, including internal policies, employee training, and independent auditing.

- 3.2 In case Third Parties breach the law, this must be reported to the Group immediately, and corrective actions must be taken to address and resolve such issues to the extent possible.

#### **4. ENVIRONMENTAL SUSTAINABILITY**

Third Parties shall comply with all relevant national and international environmental regulations and work actively to reduce their environmental impact. This includes efficient resource use, responsible waste and emissions management, reduction of greenhouse gas emissions, and safe handling of hazardous materials. Third Parties should also prioritize sustainable packaging, meet applicable product standards, and protect biodiversity. For more detailed information on these requirements, Third Parties should refer to the Company's Supplier Environmental Standards document.

#### **5. SOCIAL RESPONSIBILITY AND LABOR STANDARDS**

The Group calls on Third Parties to uphold the highest standards of social responsibility and respect for human rights:

- a) Third Parties shall treat all employees with dignity and respect, providing fair wages, safe working conditions, and equal opportunities for personal and professional growth.
- b) Third Parties must be committed to fostering a work environment free from discrimination, harassment, and forced child labor (i.e., any person proven to be below the relevant legal working age).
- c) Third Parties shall not show prejudice against women based on pregnancy status or make employment contingent on a pregnancy test.
- d) Third Parties shall ensure that their employees have the right to freely associate, join unions, and engage in collective bargaining - negotiating terms of employment, such as wages and working conditions, as a group.
- e) Third Parties must ensure that workers are paid in a timely and fair manner, in line with local and international labor standards. Fair labor practices must be maintained, including adhering to legal requirements, regarding wages, working hours, overtime, and benefits.
- f) Human rights due diligence should be conducted regularly, with Third Parties monitoring and mitigating risks associated with labor rights violations, including in their own supply chains.

## **6. ETHICAL BUSINESS PRACTICES**

6.1. The Group expects Third Parties to conduct business ethically and with integrity:

- a) Third Parties must not engage in any form of bribery, anti-competitive practices, fraudulent activities, or improper payment to gain or maintain business advantages. Third Parties must adhere to international anti-corruption standards, conventions, international and local anti-bribery laws.
- b) Third Parties are responsible for maintaining accurate records of their business dealings and ensuring that all transactions are transparent and fully documented.
- c) Conflicts of interest must be avoided, and any potential or actual conflicts that may arise must be disclosed to the Group immediately. This includes any personal or financial relationships that could potentially impact the Third Parties' operations, judgment or decisions affecting the Group.
- d) Third Parties must protect intellectual property and confidential information of both their clients, agents and partners. Unauthorized sharing or misuse of such information will not be tolerated.

6.2 The Group expects Third Parties to promote ethical behavior throughout their own supply chains and to have mechanisms in place to report unethical conduct.

## **7. HEALTH & SAFETY**

The safety and well-being of workers in the Group's supply chain is of utmost importance. Third Parties are required to maintain robust health and safety practices, ensuring that all workers operate in a safe, healthy, and secure environment:

- a) Third Parties must identify and mitigate potential risks and hazards in their workplaces, ensuring that appropriate safety measures, training, and equipment are provided to all employees.
- b) Regular health and safety audits shall be conducted to ensure compliance with all relevant laws and standards. In cases where issues are identified, prompt corrective action must be taken.
- c) Emergency preparedness and response plans shall be in place, and all workers shall receive regular safety training.
- d) Third Parties are encouraged to continually improve their health and safety practices to reduce workplace incidents and foster a culture of safety and well-being.

## **8. MONITORING AND AUDITING – ASSESSMENTS**

8.1. To ensure that Third Parties comply with the SCC, the Group reserve the right to conduct audits or assessments of Third Parties' operations. These audits or assessments will evaluate whether Third Parties are adhering to the supplier standards outlined in this document, and will identify any areas for improvement. The Group shall be entitled, by itself or through a third-party auditor designated by it, to audit Third Parties and their subcontractors, to determine the conformity with this SCC:

- a) Third Parties are committed to maintain transparency during audits or assessments and to provide all necessary documentation and access to facilities as requested.
- b) Should an audit or assessment reveal non-compliance with this SCC, Third Parties will be required to take immediate corrective actions to resolve the issues identified.

8.2 Failure to comply with the audit or assessment requirements, or to address non-compliance issues identified during audits, will require corrective actions to resolve the situation and ensure alignment with the SCC.

## **9. WHISTLEBLOWER PROTECTION AND REPORTING MECHANISM**

The Group provides a secure and confidential reporting system to ensure that all concerns are properly investigated without fear of reprisal. The Group also encourages Third Parties to report any unethical behavior, legal violations, or breaches of this SCC and implement a confidential reporting mechanism:

- a) Third Parties should ensure that their stakeholders are aware of the whistleblower and reporting mechanism and are protected from any form of retaliation.
- b) Third Parties should maintain open and transparent channels for employees to report concerns or issues related to unethical behavior or violations of this SCC.
- c) Retaliation against any individual who reports a violation in good faith is strictly prohibited.

## **10. COMMITMENT TO CONTINUOUS IMPROVEMENT**

10.1. The Group encourages its Third Parties to demonstrate a commitment to continuous improvement in their sustainability, ethical, and business practices. This means setting and working toward goals that reduce environmental impact, improve social responsibility, and enhance operational transparency:

- a) Third Parties should actively seek out innovative practices and technologies to reduce their environmental footprint and improve the sustainability of their operations.

- b) Third Parties are encouraged to conduct regular reviews and updates to their policies and practices to ensure alignment with evolving laws, standards, and guidelines.

10.2 The Group will collaborate with the Third Parties to help them achieve these improvements and ensure the Third Parties remain aligned with the Group's sustainability objectives.

## 11. SCC REVIEW

The Company's executive management will be responsible for reviewing and updating the SCC periodically to ensure its continued relevance and effectiveness.

Approved by:



**Craig Fullalove**

Chief Financial Officer and Chief Administrative Officer

**Date:** 28 November 2025

**Note:** *If there is any inconsistency between the English and Chinese versions of this document, the English version shall prevail.*