



MGM Human Rights & Anti-Human Trafficking Position Statement

MGM China Holding's Limited ("MGM"), as a leader in the hospitality industry, supports the protection of human rights. MGM is committed to conducting our business operations accordingly, which includes standing against forced labor and trafficking.

We recognize that forced labor and human trafficking is a crime of global proportions.

The International Labour Organization (ILO), a specialized agency of the United Nations, estimates that almost 21 million people are in forced labor, including 5.5 million children and 4.4 million in forced sexual exploitation. In 2014, the ILO estimated that illegal profits from forced labor worldwide amount to approximately \$150 billion per year, making forced labor, slavery or involuntary servitude, unlawful child labor and/or sexual exploitation against men, women or children one of the largest illicit money-making activities in the world.

MGM supports the elimination of forced labor and human trafficking and its destructive effect upon humanity and our communities across the globe.

MGM Human Rights & Anti-Human Trafficking Policy

MGM's Human Rights & Anti-Human Trafficking Policy formalizes the company's commitment to uphold and respect human rights for all people. This policy is guided by international human rights principles encompassed in the [Universal Declaration of Human Rights](#), the ILO's [Declaration on Fundamental Principles and Rights at Work](#), the United Nations [Global Compact](#), and the United Nations [Guiding Principles on Business and Human Rights](#).

It is MGM's policy that we, and our suppliers, shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

MGM seeks to identify, assess and manage human rights impacts within our areas of influence.

Employees & Contractors

MGM respects the human rights of our employees and follows the ILO's Declaration on Fundamental Principles and Rights at Work, including non-discrimination, prohibition of child and forced labor, and civil and political rights.

MGM's policy is to treat all employees with equity and fairness, and provide a proper process and forum where grievances can be heard, discussed and resolved. Our approach and objectives for resolving grievances are outlined in our Grievance Policy and Procedures.

MGM's Employee Handbook is made available to all employees during new hire orientation and outlines the nature of our secure employment including information such as fair compensation and benefits, holiday and leave allowance, background checks (to which all information is treated in a confidential manner and data privacy of employees is always respected), retirement and dismissal details, and our commitments to being an equal opportunity employer.

Strict terms are enforced with recruitment agencies such that they can only charge our candidates according to contract agreement terms. If we find out they charge any expenses other than those we have agreed, we will immediately terminate the business relationship with these agencies. In addition, the agencies have no right to withhold pre-hires' passports except in the case that passports are needed for procedures.



All employees receive training on human rights and anti-human trafficking in new hire orientation. This Position Statement & Policy is also available on our employee intranet. MGM provides detailed human trafficking awareness training to all security staff on how to identify and take action with any suspected case. In 2016, MGM arranged comprehensive training for all senior management, provided directly by the government-led Human Trafficking Deterrent Measures Concern Committee, to understand the important initiatives underway in the Macau community to drive prevention and awareness.

Supply Chain

We expect our contractors, suppliers and business partners to support our aims outlined in the policy. MGM has developed a Vendor Code of Conduct with provisions related to supplier workplace standards in an effort to eliminate child labor, forced labor, human trafficking or any other violation of human rights. All new suppliers must sign in acknowledgement of our Company requirements. In addition to supplier pre-registration due diligence, adherence to the Vendor Code of Conduct will be regularly monitored with announced and unannounced audits to track compliance. Risk assessment of our supply chain is evaluated through compliance with the Vendor Code of Conduct as well as through best practice screening frameworks which identify at risk products and associated regions.

Community Outreach and Partnerships

We understand that the eradication of forced labor and human trafficking is a complex process that can only be fully achieved through constructive partnerships across the public and private sector, as well as with the general public, and on a global scale.

As a leader in the hospitality industry, MGM has an important role to play in combatting this global issue. We participate in, and organize, multi-stakeholder collaborations, such as aware-raising forums and roundtable discussions, to join forces across the public and private sector.

All company personnel should be involved in upholding the objectives of this policy.

Signed,

Mr. Grant R. Bowie
Chief Executive Officer & Executive Director of MGM China Holdings Limited