

**Las Vegas Sands Corp.  
Code of Business Conduct and Ethics**

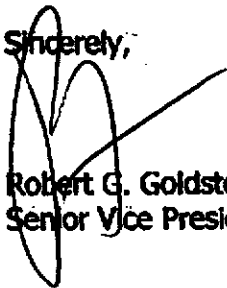
Dear Team Member:

The most highly regarded companies are praised for the conduct of their senior management and team members and their business practices, as well as for their financial results.

The Las Vegas Sands Corp. "Code of Business Conduct and Ethics" outlines the high ethical standards that we support and details how the officers, directors and team members of Las Vegas Sands Corp. and its subsidiaries (the "Company") should conduct themselves when dealing with fellow team members, customers, suppliers, competitors, and the public at large. I ask that you read this Code carefully and refer to it often for guidance. It is your personal responsibility to comply with it in all respects. While laws and business customs may vary in the different countries and cultures in which we operate, our common goal is to follow a strong ethical code in every place we do business.

Honesty, integrity, and a commitment to high standards of ethical and moral conduct are core values of the Company. I know I can count on you to adhere to these standards and to continue to build the fine reputations of our businesses.

Sincerely,



Robert G. Goldstein  
Senior Vice President

## **Introduction**

The Company is committed to maintaining high business ethics and standards. In order to preserve the integrity of the Company's business and the manner in which we are perceived by co-workers, government regulators, customers, suppliers, competitors, and the community in which we live and work, it is imperative that each officer, director and employee conduct his or her business and personal affairs in compliance with this Code of Business Conduct and Ethics (the "Code").

The Code discusses ethical and legal principles that must guide all of the Company's officers, directors and employees in their work. In order to be useful, the Code should be kept handy and reviewed from time to time. However, the Code does not cover every possible situation that may arise, and is not intended to provide final answers in all matters. The Code sets forth general principles and does not supersede the specific policies and procedures that are covered in the Company's Compliance Policy Handbook or in separate specific policies statements, such as the Company's Securities Trading Policy and the Company's Statement on Reporting Ethical Violations. General questions or issues regarding the Code may be discussed with the Compliance Officer for the employee's operating group, the Director of Internal Audit, or the Company's General Counsel.

### **Applicability of the Code; Conflict with Foreign Laws**

The Code is applicable to all directors, officers, including the principal executive officer, principal financial officer, principal accounting officer, employees and agents (collectively referred to as "Covered Persons") of the Company, regardless of their location. As an international business, the Company is affected by the laws and business customs of the countries in which it operates. Each Covered Person, wherever located, is responsible for conducting his or her business activities in compliance with the Code and the laws of the foreign country in which he or she works. When a Covered Person believes a conflict exists between the Code and the laws of a particular foreign country, he or she should bring the conflict to the attention of the Compliance Officer for the Covered Person's operating group. If necessary, the Compliance Officer will then bring the matter to the attention of the Company's Compliance Committee.

In some countries, business practices are based on less stringent or different codes of conduct than the Company's. For business dealings in such countries, Covered Persons should follow the Code, unless variances that are permitted by applicable law and are based on sound business judgment have been approved in advance by the President of the Company. All requests for variances should be directed to the Compliance Officer.

## **Employee Responsibilities**

Ethics and behavior are individual responsibilities. High standards of behavior are expected of all employees, regardless of position or location. No supervisor has the authority to require or permit conduct that is in violation of the Code or any law.

In some cases, the Company's agents represent the interests of the Company with respect to third parties. Accordingly, employees who supervise the activities of Company agents are responsible for making sure that agents under their control receive a copy of, and abide by, the Code.

## **Management Responsibilities**

All managers are responsible for seeing that Company policies are followed. Every manager is responsible for communicating Company policies to his or her employees, including those dealing with legal and ethical behavior. Managers and supervisors also are responsible for maintaining a work environment where constructive, frank, and open discussion is encouraged and expected, without fear of retaliation.

The President of the Company and management at all levels throughout the Company are responsible for ensuring adherence to the Code and for ensuring that there is appropriate ongoing employee communication, guidance, and training. Management is supported by the Company's Internal Audit, Communications, Human Resources, Security, and Legal Departments, which normally are responsible for handling many issues outlined in the Code.

### **1.0 Conflict of Interest Guidelines**

#### **1.1 General**

The Company is committed to conducting its business in accordance with high ethical standards and has adopted the ethical principles set forth below as corporate policy. It is the Company's policy that no Covered Person should place himself or herself in a position where his or her actions, personal interests, or the activities or interests of those for whom he or she acts are, likely to be, or could appear to be, in conflict with the interests of the Company. The purpose of these Conflict of Interest Guidelines is to assist the Company and its directors, officers, and employees in avoiding situations in which personal activities and financial affairs may conflict or appear to conflict with their responsibility to act in the best interests of the Company. There is no intent to invade individual privacy, but rather to identify possible problems or areas of concern that could be resolved if known.

There may well be cases in which an apparent conflict of interest is more theoretical than real, but it is important to resolve such cases promptly. In cases of doubt, for the protection of both the Company and the individual, the Covered Person should fully disclose the nature of the proposed conduct or transaction before it is undertaken. See § 5.0 "Confirmation of Compliance and Reporting" below.

Some actions under the Conflict of Interest Guidelines require the prior approval of the Company. This approval means the written consent of (a) the president of the operating division within which the employee works or, if an employee works in a corporate department, the corporate vice president who is responsible for the employee's department; and (b) either the Compliance Officer or the General Counsel of the Company.

## **1.2 Specific Guidelines**

### **1. Gifts and Contributions**

Covered Persons or any member of their immediate families

- (a) are not to give or accept, directly or indirectly, gifts, contributions, or prizes of more than minor value (e.g., \$100 or more in value) which are in any way connected with the business of, or matters involving, the Company;
- (b) are prohibited from soliciting gifts, contributions, gratuities, services, or kickbacks from suppliers or customers of the Company regardless of their value;
- (c) may not accept the use of customer or supplier property, airplane transportation, or trips (including trips sponsored by customers or suppliers); and
- (d) are not to give or accept, directly or indirectly, entertainment in excess of usual and reasonable limits that are a normal and acceptable part of regular business activity. For example, tickets to sporting or other events, lunches, dinners, golfing dates, and entertainment may be accepted if modest and appropriate and consistent with normal business customs provided that if there is any doubt about what is usual and reasonable the Covered Person should seek approval by the Company in accordance with paragraph 12 below;

in each case, except if fully disclosed to and approved by the Company. This guideline does not prohibit authorized employees in designated job categories from accepting traditional customer gratuities ("tips" or "tokens").

## **2. Loans**

Covered Persons or members of their immediate families, may not loan money to, or borrow money from, individuals or concerns that do business with or compete with the Company, except transactions with banks and other financial institutions in accordance with normal business practices and except if fully disclosed to and approved by the Company.

## **3. Purchase or Sale of Goods and Services**

Covered Persons or members of their immediate families, may not benefit personally from any purchase by or sale to the Company of goods or services or derive personal gain from transactions involving the Company, including the sale or lease of real or personal property, except when that transaction and the personal interest involved have been fully disclosed to and approved by the Company.

## **4. Direct or Indirect Business Interests**

Covered Persons or members of their immediate families, may not have any direct or indirect interest in any enterprise which competes with the Company or which has current or prospective business with the Company when that individual may be able to influence such business with the Company, except when the interest has been fully disclosed to and approved by the Company. Ownership of or interest in publicly traded securities that is not in excess of 1 percent of the securities of that corporation is not subject to this paragraph.

## **5. Association with Competitors, Suppliers, or Customers**

Covered Persons or members of their immediate families, without the prior disclosure to and approval of the Company, may not (a) work for, serve as a director or officer of, or provide services to, a customer, supplier, or competitor of the Company, or a customer of the Company's customer, or (b) be a partner of, or investor with, any individual or organization, or an employee of an organization, that is the Company's customer, supplier, or competitor, or that is a customer of the Company's customer, in each case, except if fully disclosed to and approved by the Company.

## **6. Noncompany Service and Income**

A director or officer of the Company, a group or division president or vice president, or a general manager of a business unit shall not serve as an officer, director, employee, partner, trustee, or consultant of or receive salary, fees, dividends, or other income (except dividends and interest from publicly traded securities or other similar investments) from any enterprise other than the Company,

unless that relationship has been fully disclosed to the Company's Board of Directors and its Audit Committee. It is not necessary to disclose service as an officer or a director of a not-for-profit enterprise.

## **7. Outside Employment**

Full time employees should recognize that their position with the Company must be their primary employment. Any outside employment, investment, or other source of income must be secondary and subordinate to their position with the Company, and must not interfere in any way with the performance of their duties as a Company employee. Any such relationships that could be construed as a conflict with these guidelines must be disclosed to the Company. The Company shall, in its sole discretion, determine whether any employment relationship is prejudicial to its interests and is contrary to these guidelines.

## **8. Use of Company Personnel or Property**

Covered Persons shall not use or permit others to use the Company's employees or its property for personal purposes (i) except if fully disclosed to and approved by the Company and the Company is reimbursed for its costs, or (ii) if permitted under the Company's Complementary Policy. All Company assets should be used for legitimate business purposes.

## **9. Insider Trading and Trading in Company Securities**

No Covered Person or any member of their family or any other person affiliated with the Company may directly or indirectly effect securities transactions on the basis of "insider information" until that information has been fully disseminated to the public. Insider information is any information about a company or its business about which a Covered Person may learn in connection with his or her employment or position with the Company, which is not generally known to the public, and which could affect a decision to buy, sell, or hold the publicly traded debt of a company. All Covered Persons should read and familiarize themselves with the Company's Securities Trading Policy, which addresses insider trading and trading in the Company's securities generally, and fully comply with its terms. A copy of this policy can be obtained from the Company's Legal Department. Insider trading is both unethical and illegal and will be dealt with decisively by the Company.

## **10. Misappropriation of Business or Investment Opportunities**

Covered Persons are prohibited from taking direct or indirect advantage of any business opportunity which is received by reason of their relationship with the Company and in which the Company may be interested, unless such opportunity has

been presented for consideration by the Company, has been rejected, and such activity is not prohibited under 4 through 7 above.

## **11. Illegal or Unethical Payments, Gifts, Bribes, or Gratuities; Accuracy of Company Records**

- (a) The Company's policy is to comply strictly with the U.S. Foreign Corrupt Practices Act of 1977. The Act prohibits payments or offers of payments of anything of value to foreign officials, political parties, or candidates for foreign political office in order to secure, retain, or direct business. Payments made indirectly through an intermediary, under circumstances indicating that such payments would be passed along for prohibited purposes, are also illegal.

The Act also contains internal accounting control and record-keeping requirements that apply to the Company's domestic operations. The Act's intent, in requiring these records, is to ensure that a business enterprise maintains reasonable control over its assets and all transactions involving those assets. All employees are responsible for following Company procedures for carrying out and reporting business transactions.

- (b) Covered Persons must record and report information accurately and honestly. This includes accurate reporting of time worked, business expenses incurred, research test results, revenue, and costs, and other business-related activities. All Company records are subject to audit, and financial records should be maintained in accordance with generally accepted accounting principles.

Dishonest reporting, either inside or outside the Company, will not be tolerated. This includes reporting or organizing information in an attempt to mislead or misinform. No entry shall be made on the Company's books and records that intentionally hides or disguises the true nature of any transaction.

A Covered Person may not establish for any purpose an unauthorized, undisclosed, or unrecorded fund or asset involving the Company's money or other assets.

A Covered Person may not allow transactions with a supplier, agent, customer, or other third party to be structured or recorded in a way that is not consistent with generally accepted business practices.

## **12. Approval by the Company**

Where transactions or interests involving executive officers and directors of the Company or members of their immediate families are required to be disclosed to, and approved by, the Company under this Code, such

transactions and interest must be disclosed to, and approved by, the Company's Audit Committee.

Where transactions or interests involving a Covered Person (other than executive officers and directors) or members of such person's immediate family are required to be disclosed to, and approved by, the Company under this Code, such transactions and interest must be disclosed to, and approved by the Company's Chief Compliance Officer. Any such approval by the Chief Compliance Officer shall be reported by the Chief Compliance Officer to the Compliance Committee and the Audit Committee at their next regularly scheduled meeting.

## **2.0 Compliance with Laws, Rules and Regulations**

### **2.1 General**

Compliance with both the letter and spirit of all laws, rules and regulations applicable to the Company's business, including any organization or body that regulates the Company, is critical to its reputation and continued success. All Covered Persons must respect and obey the laws of the cities, states and countries in which we operate and avoid even the appearance of impropriety. Covered Persons who fail to comply with this Code and applicable laws will be subject to disciplinary measures, including discharge from the Company.

### **2.2. Restraint of Trade, Unfair Competition, and Discriminatory Practices Guidelines**

The Company is committed to free and open competition in the marketplace. Strict adherence by all Covered Persons to the letter and spirit of the antitrust laws of the United States and with the competition laws of any other country or group of countries which are applicable to the Company's business is absolutely required. No Covered Person should assume that the Company's interest ever requires any other course of conduct.

The antitrust laws are complex and difficult to interpret. They also have application to a very broad range of corporate activities. The list of prohibited activities set forth below is not intended to be exhaustive and, taken together with the Company's Compliance Policy Handbook, are only a general guide to antitrust compliance. Employees should consult with the Legal Department prior to taking action concerning a matter about which there is any question.

It is the Company's policy that no Covered Person shall:

- (a) Agree or attempt to agree with a competitor of the Company (whether orally or in writing) with respect to any of the following: prices; terms of sale

(including discounts, credit terms, or freight allowances); amount of production; division of markets, sales territories, or customers; or the boycotting of transactions with third parties. Further, no discussion or exchanges of information regarding such matters, including exchanges through trade associations, should take place with competitors or their representatives.

- (b) Agree or attempt to agree with a customer on the customer's resale price, imply that such resale price is a condition of the sale or the receipt of a discount or advertising allowance, or discuss with or imply to a customer that the Company will attempt to influence the resale pricing of another customer. Any customer or territorial restrictions to be imposed on a customer must be discussed with the Legal Department prior to implementation.
- (c) Sell any product on the condition, understanding, or agreement that the customer must purchase another product from the Company.
- (d) Sell products of like grade and quality to competing customers at different prices during the same time period, unless a statutory exception applies.
- (e) Provide promotional payments, services, or allowances to competing customers on other than proportionally equal terms, except where a statutory exception applies.
- (f) Induce a vendor to sell a product or service to the Company at what the Covered Person knows or has reason to know is an illegal price.
- (g) Make false or misleading remarks about other companies, their services or products, including the Company's competitors.

### **2.3 Environmental Protection and Employee Occupational Health and Safety Guidelines**

The Company is committed to protecting the environment and complying with all applicable public health and environmental laws and regulations.

To meet the Company's environmental standards, the Company's facilities are required to be in compliance with all public health and environmental laws pertaining to its operations. Every facility is expected to maintain an open dialogue with local communities on the nature and hazards, if any, of the materials that it creates or handles as required by applicable environmental laws or regulations. The Company's policy is to participate actively with government authorities, industry groups, and the public in promoting community awareness and emergency response programs to deal with any potential hazards associated with Company products, materials, or facilities.

The Company has a vital interest in providing each employee with a safe and healthy work environment. The prevention of occupational accidents and illnesses is a line management responsibility. Every manager, supervisor, and foreperson bears

direct responsibility for the safety and health of every employee under his or her direction and for the safe utilization of all physical assets entrusted to his or her care.

The Company also expects and insists that every Covered Person shall always show concern for his or her own safety and that of all fellow employees. This requires each employee to perform his or her duties in a safe manner and in compliance with all relevant safety policies and procedures.

For further information and guidance, Covered Persons should refer to the Company's Health, Safety, and Environment Policy and to the various pertinent Company policies and procedures.

## **2.4 Gaming Guidelines**

The Company's policy is to conduct business with a high regard for the health and safety of its gaming patrons and, in doing so, strengthen the bond between the Company and its customers. Each Covered Person plays a critical role in ensuring compliance with the Company's problem gambling policies.

## **2.5 Protecting Confidential Business Information Guidelines**

The Company has developed confidential business and technical information over many years at considerable expense. Because of this effort, the Company now owns or otherwise possesses valuable confidential business and technical information. Covered Persons must protect the Company's confidential business and technical information as carefully as they protect the Company's tangible property. Unauthorized disclosure of this information could destroy its value to the Company and give unfair advantage to others.

To ensure confidentiality of the Company's confidential information, employees must adhere to the following principles:

- (a) Covered Persons must not disclose confidential information, either during or after employment, except when legally mandated or when authorized by the Company to disclose it to suppliers, customers, or others who have entered into confidentiality agreements with the Company.
- (b) Similar restrictions, usually provided for in contracts, apply to information obtained from the Company's customers, partners, suppliers, and others who furnish information to the Company on a confidential basis. Covered Persons must not disclose this confidential information, either during or after employment by the Company, except when legally mandated or as provided in such contracts.

## **2.6 Political Contributions Guidelines**

The Company encourages the participation of all Covered Persons as private citizens in the electoral process. However, U. S. federal law and many state statutes generally restrict a corporation from making direct or indirect political contributions. Included in this prohibition would be transportation or other services provided at a corporation's expense. Any questions regarding political activities or contributions should be directed to the Compliance Officer or Legal Department.

## **2.7 Foreign Economic Boycott Guidelines**

It is the Company's policy to comply fully with the U.S. federal government's laws and regulations relating to foreign economic boycotts. U. S. law prohibits cooperation with certain foreign economic boycotts, including the Arab boycott of Israel. In addition, U.S. law prohibits compliance with requests for information or other actions that further prohibited boycotts as a condition to the sale of goods or services. U.S. law requires prompt reporting by the Company of boycott-related requests for information or action from boycotting countries, firms, or persons, including requests directed to the Company's non-U .S. Operations.

## **2.8 Competitive Information Guidelines**

It is good business practice for the Company to gather information about the markets in which the Company does business, including information about the Company's competitors and their products and services, through business surveys, market studies, competitive analysis, and benchmarking. However, to avoid the appearance of improper agreements and understandings with the Company's competitors, employees should avoid seeking and receiving such information directly from the Company's competitors. Employees may, however, gather information about the Company's competitors from other sources, such as published articles, advertisements, publicly distributed brochures, surveys by consultants, and conversations with customers.

Employees may accept competitive information only when there is a reasonable belief that both the receipt and use of the information is lawful. Employees must never attempt to acquire a competitor's trade secrets or other proprietary or confidential information through unlawful or unethical means, such as theft, spying, disclosures by the competitor's present or former employees, or breach of a competitor's nondisclosure agreement by a customer or other party. Further, employees should not misrepresent their identity in attempting to collect such information.

## **2.9 Alcohol and Drug Abuse Guidelines**

The Company has adopted an Alcohol and Drug Abuse Policy. In summary, the Policy provides that reporting to work or for Company business, or otherwise being on Company property, including on parking lots and while operating Company vehicles, under the influence of alcohol or drugs is prohibited. A violation of the Company's Alcohol and Drug Abuse Policy will also be a violation of this Code.

## **2.10 Sexual Harassment Guidelines**

The Company strives to provide a productive work environment in which all of its employees can contribute at their highest levels. Accordingly, the Company prohibits sexual harassment of any kind, whether the harasser or the victim is a supervisor, co-worker, supplier, customer, agent, or guest of the Company. Harassment on the basis of sex is a violation of law, this Code, and the Company's Sexual Harassment Policy.

Employees should refer to the Company's Sexual Harassment Policy for additional guidance and for information regarding the procedure which should be followed in the event an employee believes that he or she has been subjected to sexual harassment.

## **2.11 Equal Opportunity Guidelines**

The Company recognizes the personal value of every employee. The Company pledges that every employee will be treated with dignity and respect, and will be judged on the basis of his or her qualifications to perform jobs, without regard to sex, race, creed, gender, religion, national origin, age, disability, veteran status or any other prohibited criteria. Employees must report violations of Company policy in this area to the Director of Human Resources or the Vice President of Human Resources.

## **3.0 Public Reporting**

Full, fair, accurate, timely and understandable disclosure in the reports and other documents that the Company files with, or submits to, the Securities and Exchange Commission, other regulators and in its other public communications is critical for the Company to maintain its good reputation, to comply with its obligations under the securities laws and any other applicable laws and regulations and to meet the expectations of its shareholders, bondholders and other members of the investment community. Persons responsible for the preparation of such documents and reports and other public communications are to exercise the highest standard of care in their preparation in accordance with the following guidelines:

- all accounting records, and the reports produced from such records, must be in accordance with all applicable laws;

- all accounting records must fairly and accurately reflect the transactions or occurrences to which they relate;
- all accounting records must fairly and accurately reflect in reasonable detail the Company's assets, liabilities, revenues and expenses;
- no accounting records should contain any false or intentionally misleading entries;
- no transactions should be intentionally misclassified as to accounts, departments or accounting periods;
- all transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period;
- no information should be concealed from the internal auditors or the independent auditors; and
- compliance with the Company's system of internal controls is required.

#### **4.0 Business Ethics Oversight**

To ensure that the Code is properly implemented and administered, the Company has established a Compliance Committee composed of members of the Company's management.

The Compliance Committee is responsible for ensuring that the Code is properly implemented and administered.

#### **5.0 Confirmation of Compliance and Reporting**

At the commencement of employment or position with the Company, each Covered Person is required to confirm that he or she has read the Code and that he or she understands that compliance with the specific guidelines which are part of the Code is required during the term of his or her employment or position with the Company. Thereafter, certain employees will be asked to reconfirm the statements regarding the Code which they made at the commencement of employment.

At the commencement of employment or position with the Company, Covered Persons are also required to disclose to the Company any conflicts of interest they may have with the Company under the Conflict of Interest Guidelines described in the Code. In the event of conflicts which arise after the commencement of employment or position with the Company, Covered Persons are required to disclose such conflicts by completing and signing an appropriate form which can be obtained from the Company's Internal Audit Department.

Every Covered Person is expected to report any violation of the Code or any applicable law of which he or she becomes aware. Individuals may choose to remain anonymous in reporting any possible violation of this Code. Employees who make reports in good faith regarding another employee's violation need have no fear of retaliation and the Company will ensure that any allegations are investigated and reviewed in the strictest possible confidence consistent with the particular situation.

Violations or potential violations of the Code must be reported to the Company's General Counsel, Chairman of the Board and Chief Executive Officer or Chairman of the Audit Committee or through the other means outlined in the Company's Statement on Reporting Ethical Violations, including the Company's Compliance Hotline.

## **6.0 Fair Dealing**

Each employee, officer and director, in carrying out his or her duties and responsibilities, should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees. No employee, officer or director should take unfair advantage of anyone through illegal conduct, manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

## **7.0 Discipline**

The Code is very important to the Company. Failure to comply with the standards outlined herein and all policies referred to herein will result in disciplinary action, ranging from a reprimand to dismissal. Disciplinary action will be taken against

- (a) any Covered Person who violates the Code or pertinent law;
- (b) any Covered Person who deliberately withholds relevant information concerning a violation of the Code or pertinent law;
- (c) the violator's manager or supervisor to the extent that the circumstances of the violation reflect participation in the violation, or lack of diligence;
- (d) any supervisor or employee who retaliates, directly or indirectly, or encourages others to do so, against an employee who reports a Code, policy, or law violation; and
- (e) any Covered Person who knowingly falsely accuses another Covered Person of a Code, policy, or law violation.

## **8.0 Waivers of the Code**

Any waiver of the Code for the principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions), other executive officers or directors will be made only by the Company's Audit Committee and will be promptly disclosed as required by law or stock exchange regulation.

Any waiver of the Code for any other employee will be made by the Chief Compliance Officer. All such waivers shall be reported by the Chief Compliance Officer to the Compliance Committee and the Audit Committee at their next regularly scheduled meeting.

## **9.0 Amendments of the Code**

Any amendment of the Code will be made only by the Company's Audit Committee and will be promptly disclosed as required by law or stock exchange regulation.

## **10.0 Compliance Procedures**

The Code cannot, and is not intended to, address all of the situations you may encounter. There will be occasions where you are confronted by circumstances not covered by policy or procedure and where you must make a judgment as to the appropriate course of action. In those circumstances the Company encourages you to use your common sense, and to contact the Compliance Officer for your operating group, the Director of Internal Audit or the Company's general counsel for guidance.

If you do not feel comfortable discussing the matter with the Compliance Officer for your operating group, the Director of Internal Audit or the Company's general counsel, please call the Company's toll free Compliance Hotline. There are two numbers: if you want to leave a voice mail, the number is (866) 358-4308, and if you want to speak with a live operator employed by an outside agency, the number is (800) 544-7459. The Compliance Hotline is a toll free number to voice your complaints and/or concerns regarding misconduct that you become aware of in the course of your employment or otherwise connected to your employment and in particular, those conducts listed in the Company's Statement on Reporting Ethical Violations. The Company strives to ensure that all questions or concerns are handled fairly, discreetly and thoroughly. You need not identify yourself.