

## Independent ESG Assurance Statement to MGM Resorts International

**Introduction & Objectives:** Trinity Consultants, Inc. (Trinity) was engaged by MGM Resorts International (MGM Resorts) to provide independent assurance for specified calendar year (CY) 2023 environmental, social, and governance (ESG) data presented in MGM Resorts’ 2024 Sustainability Report and 2024 CDP submittal. The overall objective of this process was to provide assurance to MGM Resorts’ stakeholders concerning the accuracy, completeness, reliability, and objectivity of the specified ESG information included in the CDP submittal, Sustainability Report and other disclosures. This Assurance Statement applies to the information included within the subject Scope of Work.

**Scope of Work:** MGM Resorts requested that Trinity perform limited assurance of the following specified ESG performance data for CY 2023 (January 1, 2023, to December 31, 2023) to determine whether they are fairly presented, in all material respects, in a manner consistent with the designated reporting criteria:

Table 1. CDP Disclosure

Parameter	Value	Units
Scope 1 GHG Emissions	232,707	MT CO2e
Scope 2 (Location-Based) GHG Emissions	521,184	MT CO2e
Scope 2 (Market-Based) GHG Emissions	407,884	MT CO2e
Energy Consumption (Scope 1 + Scope 2 Market-Based)	8,600,659	GJ
Scope 3 Fuel-and Energy-Related Activities GHG Emissions	237,147	MT CO2e
Scope 3 Waste Generated in Operations GHG Emissions	27,523	MT CO2e
Scope 3 Business Travel GHG Emissions	1,812	MT CO2e
Utility Water Withdrawal	4,194,988	kgal
Well Water Withdrawal	352,261	kgal

Table 2. Sustainability Report Disclosure

Parameter	Value	Units
Energy from Electricity	1,389,939	MWh
Energy from Natural Gas (or Equivalent)	805,525	MWh
Energy use, Electricity and Natural gas (or Equivalent)	2,195,464	MWh
Energy from other Fuels	120,789	MWh

The reported data was evaluated against MGM Resorts' internal GHG quantification and sustainability reporting procedures, as well as requirements for reporting GHG emissions data to CDP.

Our procedures assessed the appropriateness and effectiveness of underlying corporate reporting processes, management controls and systems used to develop, compile, analyze and report the specified ESG data.

The boundary of the data included in this assurance is limited to the global facility portfolio including hotels, casinos, meetings and conference spaces, entertainment venues, restaurant, nightlife and retail outlets, administrative offices, and the aviation fleet under MGM Resorts operational control during the subject period. Text, descriptions, interpretations, or other written statements in the 2024 CDP submittal and Sustainability Report were not included in the scope of Trinity's work.

**Reporting Criteria:** External criteria utilized to develop these data included:

- The Greenhouse Gas Protocol, A Corporate Accounting and Reporting Standard, GHG Protocol Scope 2 Guidance, and Corporate Value Chain (Scope 3) Accounting and Reporting Standard.
- MGM Resorts International GHG Inventory Management Plan
- IPCC AR4 (100-yr) Global Warming Potentials
- U.S. EPA eGRID 2024 (2022 data)
- US EPA Center for Corporate Climate Leadership GHG Emission Factors Hub (2024)
- CDP Water Security Questionnaire Reporting Guidance 2023 (2024 Guidance not yet published at the time of this verification statement)

**Assurance Standard:** Trinity's work was conducted following our standard assurance methodology and approach for external verification of sustainability data, in part based on the International Standard on Assurance Engagements (ISAE) 3000, *Assurance Engagements Other Than Audits or reviews of Historical Financial Information* (2012), suitably adapted. Greenhouse gas inventory verification was conducted to address CDP verification requirements based on the Environmental Resources Trust Corporate GHG Verification Guideline (CGVG), Tier II, appropriate for basic reporting and voluntary efforts for which there are no requirements for GHG emissions reduction compliance, suitably adapted.

**Responsibilities:** MGM Resorts' management is solely responsible for the ESG performance data and its presentation in the 2024 CDP submittal and Sustainability Report. Trinity was not involved in the collection or development of the reported data or development of either report.

Trinity's responsibility is to perform an assurance engagement to provide conclusions on the agreed Scope of Work based on the assurance activities performed, consistent with exercising our professional judgement.

**Assurance Methodology:** Trinity conducted the following activities during this assurance engagement:

- Interviewed key staff from MGM Resorts' corporate headquarters in Las Vegas, NV responsible for MGM Resorts' sustainability program, activities, and management systems for the specified GHG and ESG performance data. Our work included visits to MGM Resorts' operating facilities, interaction with staff located at MGM Resorts' Las Vegas, NV headquarters and verification of facility-specific data supporting MGM Resorts' reported GHG and ESG performance indicators.
- Ensured that MGM Resorts' scope and boundaries reflected in the reported data are fair and accurate.
- Reviewed documentation and interviewed other relevant staff to understand and evaluate the processes, systems and methodologies used to collect, compile, consolidate, analyze, and report data for the specified GHG and ESG performance indicators.
- Reviewed MGM Resorts' corporate GHG Inventory Management Plan, including suitability of calculations, GWPs, and conversion and emission factors.
- Reviewed the corporate consolidation of data for specified ESG performance data and compared it to data submitted from a sample of the individual facilities owned by MGM Resorts.
- To meet CDP reporting and verification requirements, verification procedures were applied to a sample representing all the company's enterprise-wide Scope 1 and Scope 2 GHG emissions (both location-based and market-based), as well specified categories of reported Scope 3.
- Selected underlying facility source data on a test basis and conducted a desktop review of these sample data to confirm specified site data.
- Reviewed the presentation of the above performance data in the 2024 Sustainability Report to ensure consistency with our findings, and to address changes and corrections with MGM Resorts where necessary.

**Trinity's Opinion:** Based on Trinity's verification activities, nothing has come to our attention to indicate that the corporate CY 2023 data for the specified Scope 1, location-based Scope 2, market-based Scope 2, and selected Scope 3 GHG emissions, and ESG performance metrics listed under 'Scope of Work' and disclosed in the MGM Resorts 2024 Sustainability Report and 2024 CDP submittal are not fairly presented, in all material respects, in a manner consistent with the designated reporting criteria.

Trinity has concluded that MGM Resorts has implemented sufficient processes, systems and controls for the accurate collection and analysis of activity data used to determine the reported data.

**Trinity's Observations:** Trinity has provided MGM Resorts with a separate management report. Without affecting the conclusions presented above, we have the following observations:

- MGM Resorts leadership has shown a strong commitment to maintaining a quality GHG inventory and ESG data set for Sustainability reporting. This is evidenced by conducting periodic reviews of reported data for accuracy and providing adequate resources for data compilation and quantification.
- MGM Resorts has established GHG Inventory Management Plans to guide the development and reporting of data with a focus on energy, GHG emissions and selected ESG parameters. MGM Resorts continues to demonstrate improvement with these plans.

**Limitations:** Trinity's approach to this verification was not intended to detect all weakness in management controls as described above. The verification was performed on corporate management controls on a sampling basis. Further, it should be noted that the reliability of GHG and ESG data may be subject to



inherent uncertainties, based on the established methods used to measure or calculate the underlying information.

This Assurance Statement is only valid when it is published with the 2024 Sustainability Report to which it refers and disclosed through MGM Resorts' 2024 CDP submittal and may only be reproduced in its entirety.

**Statement of independence:** Trinity is an independent professional services firm that specializes in environmental, health and safety, and sustainability compliance, risk, and performance management. We have developed and maintain a quality management system, certified to ISO 9001:2015. No member of the assurance team has a business relationship with MGM Resorts, its managers, or Directors other than for the purpose of verification of the subject GHG and sustainability data and reporting, or has had any involvement in writing the Report, data collection or validation, or the development or implementation of data systems. This verification has been conducted independently and we believe that there has been no conflict of interest.

A handwritten signature in black ink, appearing to read "MF", is positioned above the name of the signatory.

**Marcus Firstman**

**Senior Consultant**

Trinity Consultants, Incorporated  
Dallas Texas Corporate Headquarters  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

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