



MGM RESORTS INTERNATIONAL SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (“Code of Conduct” or “Code”) and its underlying principles reflects the core values held by MGM Resorts International (“MGMRI”), its affiliates and the properties listed below and their commitment to conducting business in an ethical, legal, environmentally sustainable, and socially responsible manner. MGMRI expects all businesses in the value chain, including, but not limited to suppliers of goods and services, vendors, contractors, service providers, and each of their respective subcontractors (“Suppliers”), to commit to this Code of Conduct and the expectations it sets forth. Periodically, MGMRI may adopt additional guidelines to assist Suppliers in complying with this Code.

This Code of Conduct is informed by industry practices and internationally agreed upon standards, including the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. It also supports the commitment MGMRI has made to the Principles of the United Nations Global Compact, to which it is a signatory. MGMRI expects each Supplier to work diligently to conduct its business in full compliance with applicable laws and the requirements of this Code of Conduct.

Where local laws differ from the requirements set out in this Code of Conduct, Suppliers must meet the higher standard.

This Code of Conduct sets forth the principles, standards, and guidelines that MGMRI expects Suppliers to uphold. Failure to uphold this Code of may result in cessation of further business engagements with the violating Supplier, as well as pursuit of legal remedies, if any, available to MGMRI.

HUMAN RIGHTS

Discrimination

Suppliers must not discriminate against workers and other stakeholders, including customers and business partners, on the basis of race, color, national origin, ancestry, sex, gender identity or expression, transgender status, age, sexual orientation, religion, veteran status, disability, perceived disability, union affiliation, genetic information, marital status, pregnancy, lawful migrant status, or other similar factors in hiring, terms and conditions of work, or other employment practices. Suppliers must recognize the right of all workers to equal opportunities in all aspects of employment, including benefits, remuneration, training, evaluation of the quality of their work, and access to professional development and advancement.

¹ Properties: Aria, Bellagio, Beau Rivage, Borgata, Delano, Excalibur, Empire City Casino, Luxor, Mandalay Bay, MGM Grand, MGM Grand Detroit, MGM National Harbor, MGM Northfield Park, MGM Springfield, NoMad, Park MGM, New York New York, Signature, The Cosmopolitan of Las Vegas, The Park, and Vdara.



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Harassment & Abuse

Suppliers shall treat workers with dignity and respect. Suppliers are expected to neither commit nor tolerate any form of harassment or abuse in the workplace. This includes discrimination, physical, verbal, mental, sexual, and psychological harassment, coercion, and abuse. All workers must be protected from retaliation, including as related to reporting incidents of harassment and abuse.

Wages, Benefits & Hours

At a minimum, Suppliers must operate in full compliance with all applicable labor laws regarding wages, work hours, vacation time, overtime, holidays, and benefits. Suppliers must not require workers to work more than the lesser of a) 48 regular work hours per week, plus 12 hours of overtime, or b) the limits on regular and overtime hours as allowed by local law, except in extraordinary circumstances and strictly in compliance with all applicable laws. All overtime must be performed on a voluntary basis.

Workers must have at least one day off for every seven-day work period. Suppliers must provide wages and benefits to workers as required by law, the local industry standard, or as stated in written employment terms, whichever is higher. This includes payment of overtime work at a premium rate. Deductions from wages as a disciplinary measure is prohibited. All wages owed to workers must be distributed in a timely matter and in compliance with the applicable law.

Suppliers must keep complete, transparent, ongoing, and accurate records of worker compensation and time worked.

Child Labor

Suppliers must not employ any persons under the age of 15, the applicable minimum age for employment, or the applicable age for completing compulsory education, whichever is highest. Suppliers must observe all applicable legal requirements as well as conditions as set out in the ILO Minimum Age Convention (No 138) for all workers under 18 years of age. Suppliers must have verification processes in place to ensure no recruitment of child labor.

Forced Labor and Human Trafficking

All Suppliers must ensure that no forced labor, including bonded, indentured, involuntary prison labor or slave labor is used, as defined in the ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labor Convention (No. 105). Suppliers are expected to not charge recruitment fees as part of the application process or use fraudulent recruitment practices.

Freedom of Association & Collective Bargaining

Suppliers must respect workers' right to associate, organize and bargain collectively in a lawful and peaceful manner without penalty, retaliation, or interference. Where workers are represented by a union, Suppliers are required to establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.



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Worker Feedback and Grievance Mechanisms

Suppliers must establish a confidential, unbiased, non-retaliatory complaint procedure that enables workers to raise concerns without fear of intimidation. Retribution or retaliation taken against any individual who has sought advice or reported a complaint, including questionable behavior or a possible violation of this Code of Conduct, is prohibited. Violations can be reported to MGMRI Ethics and Compliance Hot Line by calling from within the United States (877) 597-7462 or visiting www.mgmethics.ethicspoint.com.

HEALTH, SAFETY & ENVIRONMENT

Health & Safety

Suppliers must comply must ensure that they have a safe and healthy work environment that operates in compliance with all applicable laws and regulations related to workplace conditions. Suppliers are required to maintain a productive workplace by minimizing the risk of accidents, injury, and occupational diseases. Suppliers must ensure facilities have, including but not limited to, accessible and adequate bathrooms, potable water, sanitary food preparation and eating facilities, ventilation, lighting, and temperature control. If housing is provided, living conditions must be clean, safe, and reasonable.

Suppliers

should also include appropriate controls, safe procedures, preventative maintenance, and appropriate protective equipment. Suppliers must take necessary steps to ensure that sites are structurally safe and well maintained. Fire exits must remain accessible and unobstructed, and safety equipment, evacuation plans, and periodic evacuation drills should be provided.

Environment

Supplier must comply with all applicable environmental related legal and regulatory requirements. Additionally, Suppliers should adopt an environmental policy outlining a commitment to reduce the adverse impacts of its business activities on the environment, such as greenhouse gas emissions and energy consumption, water withdrawals, resource use, and deforestation and land conversion. Supplier is encouraged to disclose applicable environmental data and information in accordance with recognized sustainability reporting standards. Supplier is expected to develop company programs to address environmental risks relevant to its business activities.

Animal Welfare

Suppliers must comply with local and international regulations and standards on the ethical, humane and legal treatment of animals, including the “Five Freedoms of Care” as endorsed by the World Organization for Animal Health. This includes freedom from thirst, hunger and malnutrition; freedom from fear and distress; freedom from heat stress or physical discomfort; freedom from pain, injury and disease; freedom to express normal patterns of behavior. Suppliers must also uphold applicable MGMRI policies related to animal welfare.



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SUPPLIER ENGAGEMENT

Subcontracting

Supplier may only use Subcontractors to the extent authorized in writing by MGMRI and only pursuant to the terms of Supplier's agreement with MGMRI. Notwithstanding the foregoing, (i) Supplier will remain fully and solely responsible and liable for proper performance of all Supplier obligations under its Agreement, and (ii) Supplier will ensure that all such Subcontractors are informed of and agree in writing to comply with all applicable terms and conditions of this Code of Conduct.

Legal and Ethical Sourcing

MGMRI is committed to the legal and ethical sourcing of its products and services and will not knowingly make purchases made with illegally harvested, produced, or traded products and services; nor will it knowingly make purchases associated with forced or involuntary labor, in whole or in part.

Management Systems

Suppliers must ensure that the requirements of this Code are consistently implemented, adequately monitored, and clearly communicated to workers and supervisors in a language that they understand.

ETHICS AND COMPLIANCE

Legal Compliance

Suppliers must act in accordance with all applicable international, federal, state, and local laws and regulations. All government-required licenses and certificates must be retained and maintained. - Suppliers must be honest, direct, and truthful in discussions with regulatory agency representatives and government officials.

Corruption & Bribery

Suppliers, their representatives and workers, must neither engage in nor tolerate association with any form of corruption, bribery, extortion, or embezzlement. Suppliers must not participate in bribes or kickbacks of any kind, whether dealing with public officials or individuals in the private sector. Suppliers, their representatives and workers must follow all anti-corruption and anti-money laundering laws, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations, including the US Foreign Corruption Practices Act (FCPA) and local laws.

Conflict of Interest

All Suppliers must inform MGMRI of any actual, perceived, and potential conflicts of interest that arise from business or personal relationships with MGMRI customers, suppliers, business associates, workers, or competitors via the Ethics and Compliance Hot Line. Please call (877) 597-7462, or visit mgmethics.ethicspoint.com.



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Fair Competition & Marketing

MGMRI succeeds by competing fairly and dealing truthfully with customers and Suppliers, without manipulation or concealment. Suppliers must uphold fair business standards in advertising, sales, and competition. Suppliers are required to comply with applicable antitrust and competition laws that prohibit agreements between competitors that affect prices, costs, terms, or conditions of sale.

Monitoring & Compliance

Suppliers must allow MGMRI representatives (including third parties, such as auditors) access to facilities and documentation, whether announced or unannounced, for evaluation of compliance with this Code of Conduct. Suppliers must be honest, direct, transparent, and truthful in all discussions with MGMRI representatives. Suppliers are expected to take necessary corrective actions to promptly remediate any non-compliance with this Code of Conduct. Suppliers will maintain all documentation that may be needed to demonstrate compliance with this Code of Conduct.

CONFIDENTIALITY, PRIVACY AND DATA SECURITY

Suppliers must keep all their supply agreements and arrangements with MGMRI and its affiliates confidential, except to the extent a particular disclosure is required by applicable law or by a valid court order or other legal process of an administrative agency or other government body. Suppliers must protect MGMRI customers', workers' and clients' data, information (including personal information), privacy and confidentiality and process such information and data in accordance with the terms of the agreement (if any) between Supplier and MGMRI as well as applicable law and legal requirements. Unless otherwise stated in an executed agreement, Suppliers may only collect, use, retain or share information needed to fulfill their contractual obligations to MGMRI, must not disclose (including selling and sharing) personal information, and must immediately notify MGMRI of any breach or suspected data or privacy breach. Subject to applicable law, Suppliers must refrain from disclosing to any other outside parties any written or verbal confidential information provided by the Company without first obtaining written permission from an authorized Company representative. Supplier must maintain reasonable and appropriate technical, organizational and physical measures to protect data and information that it collects, accesses, stores, processes or receives from, or on behalf of, MGMRI. Suppliers shall collect, use, protect, and disseminate information only in accordance with appropriate and/or applicable privacy legal requirements and other standards including, but not limited to, the General Data Protection Regulation ("GDPR"), the California Consumer Privacy Act ("CCPA"), and other local, state, federal or international privacy and data security laws, regulations and requirements.

MGMRI reserves the right to amend or modify this Code of Conduct. Violations of this Code of Conduct and other forms of misconduct can be reported to the MGMRI Ethics and Compliance Hot Line by calling (877) 597-7462, or visiting mgmethics.ethicspoint.com