

MGM Resorts International - Climate Change 2021

C0. Introduction

C0.1

(C0.1) Give a general description and introduction to your organization.

MGM Resorts International (NYSE: MGM) is a S&P 500® global entertainment company with national and international locations featuring best-in-class hotels and casinos, state-of-the-art meetings and conference spaces, incredible live and theatrical entertainment experiences, and an extensive array of restaurant, nightlife and retail offerings. MGM Resorts creates immersive, iconic experiences through its suite of Las Vegas-inspired brands. The MGM Resorts portfolio encompasses 29 unique hotel and destination gaming offerings in the United States and Macau, including some of the most recognizable resort brands in the industry such as Bellagio, MGM Grand, ARIA and Park MGM. The Company's 50/50 venture, BetMGM, LLC, offers U.S. sports betting and online gaming through market-leading brands, including BetMGM and partypoker. The Company is currently pursuing targeted expansion in Asia through the integrated resort opportunity in Japan. Through its "Focused on What Matters: Embracing Humanity and Protecting the Planet" [initiative](#), MGM Resorts commits to creating a more sustainable future, while striving to make a bigger difference in the lives of its employees, guests, and in the communities where it operates. The global employees of MGM Resorts are proud of their company for being recognized as one of FORTUNE® Magazine's World's Most Admired Companies®. For more information, please visit us at www.mgmresorts.com. Please also connect with us @MGMResortsIntl on [Twitter](#) as well as [Facebook](#) and [Instagram](#).

We have publicly committed to being a global advocate in accelerating the fight against climate change including by ensuring long-term viability through climate resiliency planning and ongoing carbon reduction; using our voice to advocate for sound governmental policy on climate change and by supporting innovations with broad application to accelerate the fight against climate change. Relatedly, we have a long standing commitment to sustainable design and construction, through which we build with tomorrow in mind.

One point of note for our 2021 Questionnaire for our 2020 CDP data disclosure is that the business impacts of the COVID-19 Pandemic made a significant dent on our plans to engage our value chain, including suppliers and customers on climate change. For example, we had planned to engage extensively in 2020 with convention clients on how to understand, measure and reduce the carbon footprint of their events; however our convention business ground to a halt due to COVID-19 related restrictions. Similarly, we had planned to release a formal Supplier Code of Conduct in 2020 in which we strongly encouraged suppliers to measure and set goals to reduce their greenhouse gas emissions. Both programs were intended for 2020 but were delayed to 2021 due to business shutdown. We did not however let COVID restrictions fully limit our stakeholder engagement on climate change; we conducted a thorough Materiality Assessment with a deep assessment of stakeholder interest in climate change, and we pursued multiple efforts to engage peers in the events industries to collaborate on climate.

We recognize that climate change presents both risks and opportunities for our company and are pleased to participate in this CDP Climate Change 2021 Questionnaire.

C0.2

(C0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2020	December 31 2020	No	<Not Applicable>

C0.3

(C0.3) Select the countries/areas for which you will be supplying data.

China, Macao Special Administrative Region
United States of America

C0.4

(C0.4) Select the currency used for all financial information disclosed throughout your response.

USD

C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

Operational control

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Board-level committee	<p>Members of the MGM Board of Directors Committee for Corporate Social Responsibility (CSR) have responsibility for managing information on climate related issues and guiding decisions on what the company will do vis a vis climate risks and opportunities. The Committee is headed by a Board Director. This committee was established in 2011 to oversee all of the company's activities related to CSR, including most recently all social impact and sustainability initiatives under our commitment to be "focused on what matters". The Committee governs four main pillars of company activity: fostering diversity & inclusion, investing in community, caring for one and other and protecting the planet. Energy and climate related issues are the predominant issues governed by the Committee within the protecting the planet pillar. Notably, MGM's Board Director who is Chair of the Board CSR Committee is a global expert in clean energy, with over two decades of experience in advocacy in legislative and utility regulatory proceedings relative to renewable and clean energy policy in Nevada and across the U.S. One example of a climate-related decision made by the committee is the decision by MGM to commission a 100MW solar array to help significantly lower our long term carbon footprint in our home region of Las Vegas. This "MGM Resorts Mega Solar Array" began operational service in May 2021 and will provide up to 90% of the daytime electricity needs of the 13 Las Vegas Strip resorts of the company.</p>

C1.1b

(C1.1b) Provide further details on the board's oversight of climate-related issues.

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
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Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	<p>Reviewing and guiding strategy</p> <p>Reviewing and guiding major plans of action</p> <p>Reviewing and guiding risk management policies</p> <p>Reviewing and guiding annual budgets</p> <p>Reviewing and guiding business plans</p> <p>Setting performance objectives</p> <p>Monitoring implementation and performance of objectives</p> <p>Overseeing major capital expenditures, acquisitions and divestitures</p> <p>Monitoring and overseeing progress against goals and targets for addressing climate-related issues</p> <p>Other, please specify (Reviewing communications strategies on all CSR and climate related matters to all constituents including employees, management, customers and investors.)</p>	<Not Applicable>	<p>The Corporate Social Responsibility (CSR) Committee of the Board of Directors provides oversight of all climate-related issues at a detailed level. Prior to, after, and during the reporting year of 2020 this has included: 1. Reviewing and giving input on energy efficiency investments. 2. Reviewing and giving input on renewable energy investments. 3. Reviewing and giving input on 2025 and 2030 goals for energy, climate, water and materials diversion 4. Reviewing and giving input on Science-Based Targets (SBTs) 5. Reviewing and giving input on value-chain engagement on sustainability including customer and supplier engagement on climate-related issue 6. Reviewing and giving input on climate risk management 7. Reviewing and giving input on the company's extensive materials and waste management activities, including its extensive food waste reduction and landfill diversion efforts.</p>

(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Chief Executive Officer (CEO)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly

C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).

The Chief Executive Officer (CEO) is the highest management-level position with direct responsibility for management of climate-related issues at MGM Resorts International. The CEO reports to the Board of Directors.

The two main divisions with climate-related implementation oversight within the company are the Social Impact & Sustainability Division, led by our Chief People, Inclusion and Sustainability Officer and MGM Resorts Design & Development (MRDD), led by our President of Design & Development, who also oversees Facility Management. Both of these division leader positions report directly to the MGM CEO or MGM Chief Operating Officer (COO). Thus, in this structure the CEO is primarily responsible for all climate-related issues and as such reports on these matters directly to the MGM Board of Directors.

Ultimately property level teams and /or functional teams within functional Centers of Excellence (COEs) are responsible for execution of energy reduction and waste reduction plans (including food waste reduction).

Climate related issues are monitored by the CEO with regular input from experts in these teams. The CEO signs off and tracks progress on climate goals and other forward-looking commitments such as our current public commitment to establish a Science Based Target (in process, submitted in 2021); oversees all energy and climate related investments; and formally reports to the Board CSR Committee with the support of these experts. The CEO also reviews and signs off on MGM's CDP Response including all risks and opportunity disclosures.

C1.3

(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

	Provide Incentives for the management of climate-related issues	Comment
Row 1	Yes	The MGM Board of Directors Compensation Committee has historically considered the CEO and named executive officer's participation in ESG initiatives in determining whether to increase, reduce or eliminate their annual bonuses. The Company's ESG initiatives include goals related to climate change strategy.

C1.3a

(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction target Energy reduction target Other (please specify) (Waste management and diversion targets)	The MGM Board of Directors Compensation Committee has historically considered the CEO's participation in ESG initiatives in determining whether to increase, reduce or eliminate annual bonuses. The Company's ESG initiatives include goals related to climate change strategy.
Other C-Suite Officer	Monetary reward	Emissions reduction target Energy reduction project Other (please specify) (Waste management and diversion targets)	The MGM Board of Directors Compensation Committee has historically considered named executive officer's participation in ESG initiatives in determining whether to increase, reduce or eliminate their annual bonuses. The Company's ESG initiatives include goals related to climate change strategy.

C2. Risks and opportunities

C2.1

(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?

Yes

C2.1a

(C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
Short-term	0	3	We consider short-term risks along the same time scale as our operational and financial planning, generally 0 - 3 years.
Medium-term	3	5	We consider medium-term risks along the same time scale as our capital planning, generally 3 - 5 years.
Long-term	5	10	We consider long-term risks along the same time scale as our social impact & sustainability planning, generally 5 - 10 years. Our public goals in these areas are established for 2025 and 2030 (the latter to align with U.N. Sustainable Development Goals)

C2.1b

(C2.1b) How does your organization define substantive financial or strategic impact on your business?

We define substantive financial or strategic impact to be related to risks that most directly threaten the achievement of the Company's most important long-term strategic objectives:

1. Real Estate Strategy
2. Maximizing Operating Efficiency
3. Disciplined Capital Allocation
4. Future Growth Opportunities

More specifically, A modest (low) financial impact is defined as a potential impact with a net present value of less than \$1.0M. A substantive (medium) financial impact is defined as any potential impact with a net present value between \$1.0M and \$10.0M. A severe (high) financial impact is defined as any potential impact with a net present value of \$10.0M or greater. An example indicator utilized would be the evaluation of a climate-related operating expense element such as an analysis of the market price of carbon-based energy vs. renewable energy.

C2.2

(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

Value chain stage(s) covered

Direct operations
Upstream

Downstream

Risk management process

Integrated into multi-disciplinary company-wide risk management process

Frequency of assessment

More than once a year

Time horizon(s) covered

Short-term

Medium-term

Long-term

Description of process

As of 2020, Climate Related Risks are assessed as part of MGM's overall formal Enterprise Risk Management Process. This process, which is managed by MGM's Senior Vice President of Internal Audit, includes a broad assessment of risks faced by MGM Resorts. The outcome of this process is a risk register which includes the following conceptual areas: • Risk Statements • Risk Owner(s) • Risk Mitigation Activity • Risk Exposure • Link to Strategy • Primary Risk Owner(s) • Secondary Risk Owner(s) Climate Change has been officially recorded in the Enterprise Risk Management Risk Register. The following summary statement is provided in the Risk Register that is reviewed and approved by the Audit Committee of the Board of Directors: "Some of the Company's properties face increased physical risk associated with severe weather events exacerbated by climate change. This is especially true for properties in close proximity to rivers and oceans. Severe weather events related to climate change have already, and are likely to continue increasing supply chain shocks and related price spikes. This is driven by potential impacts on the flow of goods, as well as production constraints of agricultural commodities triggered by drought, flood or fire." Beyond the formal Enterprise Risk Management risk register, the Social Impact & Sustainability Division also identifies climate-related risks and opportunities, at a deeper level. This specific deeper examination process assesses risk impacts across all elements of our value chain, such as direct resort operations, as well as those associated with select upstream suppliers and downstream customers. On at least a quarterly basis, the Social Impact & Sustainability Division engages with key internal company stakeholders including the Facilities Center of Excellence (COE) and resort operators. Tactics include specific climate-related agenda items as required on monthly Facilities COE meetings with resort operators. Company climate related risks and opportunities are identified at the corporate level and incorporate at the property level via best practices and Standard Operating Procedures (SOPs). Alternatively, operational factors including climate related risks and opportunities are identified by property operators for attention by the Social Impact & Sustainability Division and Facilities teams. One example of a physical risk being identified is the assessment by the Social Impact & Sustainability Division of the impact of chronic heat waves occurring in the Las Vegas region, where the company operates 13 major resorts. The likelihood was assessed to be high, on a short-term time horizon, with a substantive impact of potentially higher net present value energy costs of between \$1.0M and \$10.0M. This substantive impact included the determination that up to 25% of a resort's electricity load is related to direct heating and cooling, the latter most prevalent in Las Vegas. A primary task in working to mitigate this risk included a directed assessment by multiple Las Vegas property operators in 2019/2020 of property central plant chillers and associated pumps and infrastructure. The age of these multiple properties, and their associated equipment as much of it was original installation, necessitated a multi-property review to protect against potential heating and cooling failures that would adversely affect hotel guest comfort and safety and increase both heating and cooling costs. The result was a capital proposal to upgrade multiple chillers at six separate properties in one coordinated project that was presented to MGM senior management and the Board of Directors. The project was approved, implemented, and now guards against these risks as well as improve property overall energy efficiency by an estimated 2%-3% at these properties. The properties affected were The Mirage, Mandalay Bay, MGM Grand, Bellagio, Luxor, and Park MGM, all in Las Vegas. An example of a transitional risk identified in the company's value chain, as well as a transitional opportunity realized, is the 2016 action of MGM Resorts to separate from the fully bundled sales system of the local electric utility on behalf of its 13 Las Vegas properties. This action followed an assessment by the Social Impact & Sustainability Division in 2015 that concluded rising carbon costs of fossil fuel based electricity presented a risk to the company, with a corresponding potential benefit of increasing the share of renewable and carbon free electricity in the company's portfolio. The likelihood was assessed to be high, on a medium-term as well as long-term time horizon, with a severe impact of potentially higher net present value energy costs of more than \$10.0M. To mitigate this risk, and realize the potential opportunity, MGM completed the transition with the local utility and formed a partnership with Invenergy to develop a 100 megawatt (MW) solar

photovoltaic (PV) array for the exclusive use of the Las Vegas properties of MGM Resorts. This array, the MGM Mega Solar Array, began commercial operations in May 2021 and is projected to account for 35% of the total volume of electricity procured by these 13 Las Vegas properties.

C2.2a

(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	<p>MGM Resorts is affected by a broad array of current regulations that present multiple potential risks. One example concerns eight MGM properties that are included in the U.S. Environmental Protection Agency (EPA) Title V air emissions permit and regulated under the Clean Air Act. As a holder of this Title V permit, MGM must adhere to strict operational requirements in regards to the operation of certain facility equipment. Failure to comply carries the climate-related risk of regulatory penalties and fines which could increase operating costs of these eight properties by up to \$600,000. These risks are identified in the first step in the MGM Resorts deep examination climate-related risk management process, interaction between the Social Impact & Sustainability Division, the Facilities Center of Excellence (COE), and property operators. They are further identified and assessed as to the magnitude of potential impact through the remaining steps and utilized in applicable tactics such as the development of energy conservation budgets, which are ultimately approved by senior management. As such, MGM takes an active role in the promotion of policies to help facilitate such measures at the most attractive terms possible in the communities in which it does business. A second example of a potential risk area in terms of supply influenced by current regulation is in the area of water conservation and management. More than 80% of the hotel rooms of MGM Resorts exist in Las Vegas, an area of potential drought. As such, MGM actively supports organizations to develop sound water policy. These groups include WaterStart, Springs Preserve, ONE Drop, and the Southern Nevada Water Authority (SNWA). These efforts help to mitigate future potential water supply disruption risks that may impact business operations in Las Vegas. Third, there are current regulations affecting operational risk in energy supply markets. As such, MGM actively supports the development of renewable energy through regulatory processes. In jurisdictions such as Nevada, the adoption of more renewable energy helps to lower the overall regional emissions of greenhouse gases. Lower emissions help to mitigate future forms of carbon costs such as potential carbon taxes as well as diversify local economies and improve local health.</p>

	Relevance & inclusion	Please explain
Emerging regulation	Relevant, always included	<p>Emerging regulations may affect MGM Resorts in a myriad of ways and present ongoing climate-related operational risks. One specific example is emerging Renewable Energy Policy. Emerging policy in this area presents operational risk in that it may affect the future cost of energy and the implementation plans of MGM Resorts to increase its share of energy sourced from renewable resources. For instance, a delay in a jurisdiction's permitting of future renewable energy developments may adversely impact a planned company project and thus increase exposure to rising carbon costs associated with fossil fuel based electricity. This risk is judged to be substantive with a net present value of between \$1.0M and \$10.0M. This risk is a critical component of the MGM deep examination risk management process in that it begins with the first step in the process, interaction of the Chief Executive Officer (CEO), Social Impact and Sustainability Division, the MGM Resorts Design & Development Team, and company departments such as Government Affairs. Emerging policy elements are assessed in terms of their potential impacts on the costs or timeline of Company plans. Tactics are then developed and approved as part of the risk management process such as targeted interaction with regulatory bodies at the local, state, and Federal levels. Prior company activities as a result of this process have included interactions with the Nevada State Legislature and the Governors Panel on climate change, the Harry Reid Blue Ribbon Energy Panel, the Southern Nevada Solar Energy Lab Development Committee, and frequent interactions with state representatives for input on broad energy related issues. MGM Resorts has provided input on several renewable energy related bills in Nevada. Notably in April 2019, MGM supported SB 358 which was signed into law and substantially increased the renewable portfolio standard (RPS) in Nevada. Another key example includes the development and passage of SB 448 in the 2021 Nevada Legislative Session. SB 448 will facilitate significant investments in electricity transmission and electric vehicles (EV) infrastructure to further position Nevada as a leading state in renewable energy and carbon emissions reduction. MGM Resorts was active throughout the SB 448 process.</p>
Technology	Relevant, always included	<p>Technological changes present risk in terms of the potential for MGM Resorts to fail to keep up with industry best practices and customer expectations in climate-related areas. As such, best practices are studied both within the operations of MGM Resorts as well as in organizations and industries external to the company. Operators provide direct day-to-day experience, while the Social Impact & Sustainability Division provides a broad perspective through external research. Tactics developed include the use of existing and emerging technologies such as practices to establish and advance smart-building systems and energy management platforms. These help to mitigate the risk of rising energy costs and lower the dependence on fossil fuels. Specific tactics are prioritized according to the relative potential impacts they represent. These may be in the form of energy conservation to be achieved and thus the mitigation of future rising operating costs. All such tactics are ultimately approved by senior management. Specific risks to the company include failing to keep up with best-in-class standards in terms of energy management within the hospitality industry. It is estimated that a failure in the area of best-in-class energy management would result in a substantive impact of between \$1.0M and \$10.0M in higher net present value energy costs. To mitigate this risk, MGM Resorts, through the Social Impact & Sustainability Division, along with the Facilities Center of Excellence (COE), maintains constant monitoring of emerging technologies. The best concepts are incorporated into the annual capital budget dedicated exclusively to the promotion of energy and water conservation initiatives. Continual investment in appropriate technologies helps to strengthen the reputation of MGM Resorts as a leader in Sustainability. This, in turn, helps to mitigate the risks of losing competitive position or advantages, as well as the erosion of market share and customer reputation. We also leverage technology to mitigate market risks associated with climate change. For example, we have significantly improved the digital assets we use to share our commitment to climate action. This includes using major updates in 2019, 2020, and 2021 to our Social Impact & Sustainability websites; the use of large format displays describing our commitment to solar at Mandalay Bay, and widespread use of social media to communicate our energy and environmental programs.</p>

	Relevance & inclusion	Please explain
Legal	Relevant, always included	The overall Social Impact & Sustainability plan at MGM Resorts serves as a framework and guides all company actions to reduce the environmental impact of operations. Activities taken to influence policy at the local, state, and national level are reviewed in the context of this framework and with senior management and/or the Corporate Social Responsibility (CSR) Committee of the Board of Directors. Further, key stakeholders both internal and external to the organization are consulted where appropriate. These efforts result in the development and support of applicable legislation and regulations affecting environmental responsible operations and practices. An example of a risk type included in our deep examination climate-related risk assessment is one or more possible fines and litigations from alleged legal violations to the Clean Air Act. MGM operations are under the effects of many regulations within multiple jurisdictions such as facility air emissions regulated by the US Environmental Protection Agency (EPA) and the Clark County Department of Air Quality in the Las Vegas region, where we can also be subject to possible litigation from alleged violations. Risks in this area are reviewed as part of the MGM risk management process via interactions between the Social Impact & Sustainability Division, Facilities Center of Excellence (COE), property operators, and the Legal department. MGM operators continually maintain operational best practices in this area and work regularly with pertinent officials to comply with all applicable laws and regulations. The practices are incorporated into Standard Operating Procedures (SOPs). These efforts serve to mitigate the risk of any non-compliance assessments or fines or other legal actions.
Market	Relevant, always included	Discerning customers in the hospitality industry are demanding higher environmental and climate-related standards from the resorts they visit. We believe the acceleration of climate change will give rise to a greater number of such customers, and a deeper focus on this issue as a reason to support businesses. Failing to meet this growing market demand, especially in the business-to-business convention client segment may result in loss of business and erosion of long-term market share. To address these risks, one example strategy MGM has developed is a proprietary package of sustainable event options for clients considering business meetings or conventions. This was developed through a collaboration between the Social Impact & Sustainability Division and Convention Sales, Catering & Services teams. The sustainable event options cover themes from Venue & Space, Decor & Signage, Food & Beverage and Outreach & Education. The environmental benefits these options help drive relate to energy & climate, water, and materials and waste. In addition, MGM offers detailed environmental impact reports for client events, which include detailed calculations of the events environmental footprints including estimated energy, carbon emissions, water, and materials & waste associated with the event. These best practices are incorporated into annual strategic plans to mitigate the risk of market share loss and improve the brand and reputation of MGM Resorts. In addition, MGM Resorts is one of the world's largest non-chain, multi-concept operators of restaurants, and we have a very substantial banquets and conventions business. As such our business is highly reliant on potentially price volatile agricultural commodities, particularly those most susceptible to climate change. We believe climate change is already giving rise to decreased crop and increased price volatility.
Reputation	Relevant, always included	One driver of environmental sustainability efforts at MGM Resorts, including all climate change related efforts, is the ability for these efforts to advance the company's reputation. In particular extensive renewable energy efforts have a discernible positive impact on company reputation with multiple stakeholders. A key example of potential risk in this area is the risk to the company represented by the perception of MGM Resorts to be a significant consumer of energy; and in particular, of fossil-fuel based, carbon-intensive forms of energy. In 2019 MGM Resorts had over \$95M in revenue associated with business customers requesting specific sustainability information and event support. Much of this information involved energy. A failure by MGM to continue to advance progress in the way of renewable energy could place this business segment at risk. Thus, this risk is determined to be severe with a net present value of greater than \$10.0M in potential business impact. This risk has been identified as part of the deep examination risk management process and through the interaction of the CSR Committee of the Board of Directors, the Chief Executive Officer, the Social Impact & Sustainability Division, Facilities Center of Excellence (COE), and property operators. Feedback from both customers and employees has been assessed. In 2018 MGM Resorts announced a partnership with Invenergy, North America's largest independent renewable energy company, to develop a 100 megawatt (MW) solar energy facility 25 miles north of Las Vegas to be exclusively dedicated to the Las Vegas properties of MGM Resorts. This system, the "MGM Resorts Mega Solar Array" began commercial operation in May 2021. This is one example of the Company taking aggressive and proactive actions to make meaningful progress in Sustainability and to mitigate any reputational risks to the Company in the area of climate-risk management.

	Relevance & inclusion	Please explain
Acute physical	Relevant, always included	<p>Extreme weather conditions, exacerbated by climate-change may cause property damage or interrupt business, which could harm the business and results of operations at MGM Resorts. Certain company properties are located in areas that may be more subject to extreme weather conditions, including, but not limited to hurricanes, droughts, coastal floods, fires and other water stresses in the United States and severe typhoons and coastal floods in Macau. Such extreme conditions may interrupt operations, damage properties, and reduce the number of customers who visit MGM facilities in such areas. Many of these acute physical risks manifest as water related risks with the potential to cause property damage and business interruption. For example, according to the WRI Aqueduct Water Risk Atlas, our resorts Beau Rivage in Biloxi, Mississippi and Borgata in Atlantic City, New Jersey face Medium-High risks of coastal flooding. Our resort Gold Strike Tunica faces extremely high risk of riverine flooding. And our Las Vegas properties face high water stress and low to medium drought risk. Our primary business footprint is in Las Vegas and our operations here could be adversely impacted by a drought or other cause of water shortage. An extensive duration of drought in Las Vegas or in other regions in which MGM operates could adversely affect business and results of operations. More than 80% of company hotel rooms are located in Las Vegas, making such a drought in Las Vegas for instance, a material risk with a substantive financial impact potential. These risks are actively incorporated into key strategic plans including annual insurance levels and limits. Further, MGM takes an active role in climate-risk management such as diversification of its annual energy supply plan to incorporate increasing levels of renewable energy. The company also supports water conservation and advanced water management technologies to mitigate potential supply risks in areas such as Las Vegas. This is a key part of the climate-related management process and plans at MGM Resorts.</p>
Chronic physical	Relevant, always included	<p>Chronic physical risks include potential water supply issues, long term changes in precipitation and potential sea level rise. These issues are included in the climate-related risk management process of MGM and informed by research conducted by the Social Impact & Sustainability Division, in partnership with the Facilities Center of Excellence (COE). As part of our water supply strategy, we focus on water conservation and management within our own operations and support external efforts to manage water sheds and conserve water through technology used within and outside our hotels . In response, MGM has assessed the risk to the Las Vegas community associated with potential future water challenges. We collaborate on these matters with local experts and regulatory bodies such as the Southern Nevada Water Authority (SNWA) and we provide funding to several water conservation, awareness and outreach efforts, including WaterStart, Springs Preserve, and ONE Drop. These efforts help to mitigate future potential water supply disruption risks that may impact business operations in Las Vegas. Outside Las Vegas our focus is on developing Business Continuity Plans to manage risks at the properties most at risk of coastal flooding. For instance, chronic physical risks of long-term changes in precipitation and potential sea level rise pose a risk to our properties such as MGM National Harbor in Maryland. This risk is determined to be severe in that it could affect business operations by a net present value of greater than \$10.0M. In addition, we provide messaging for guests and means to conserve water such as through towel and linen reuse programs and water conserving options when planning meetings and conventions at company facilities.</p>

C2.3

(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes

C2.3a

(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

Identifier

Risk 1

Where in the value chain does the risk driver occur?

Upstream

Risk type & Primary climate-related risk driver

Current regulation Carbon pricing mechanisms

Primary potential financial impact

Increased direct costs

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

For MGM Resorts, global Scope 2 GHG emissions are generated from the 29 unique hotel and resort destinations operated by the company. These Scope 2 emissions are the result of purchased electricity in each of the markets in which the company operates. The total volume of this purchased electricity is approximately 1.1 billion kilowatt hours annually at about \$100 million of operating expense. MGM is unique in the gaming industry in that a significant portion of the company portfolio is located in the single region of Las Vegas, Nevada. More than 60% of the total volume of kilowatt hours, about 700 million, are sourced on behalf of the Las Vegas operations of the company. The state of Nevada is one of the most generally progressive states in the area of renewable energy, with a primary example being SB 358 signed into law in April 2019 that raised the states Renewable Energy Portfolio Standard (RPS) to 50% by 2030. Further, in December 2020 the State of Nevada issued its first formal Climate Strategy (<https://climateaction.nv.gov/our-strategy/>) aiming for net-zero emissions by 2050. Nevada's progressive stance on renewable energy, as seen through SB 358 as well as the State's formal Climate Strategy, could result in up to \$15.0M in increased direct costs to the Las Vegas operations of MGM Resorts through carbon taxes or other market impacts. Electricity is a direct cost necessary for the provision of hospitality services provided by MGM Resorts to its guests.. The progressive stance of Nevada carries a risk of future costs of fossil-fuel energy rising as a result of a carbon tax or other market factors.

Time horizon

Medium-term

Likelihood

More likely than not

Magnitude of impact

High

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

15000000

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

As a provider of hospitality services and experiences to its guests, MGM Resorts considers electricity to be a direct operational cost critical to the provision of this service. The financial impact figure of \$15.0M is 25% of the current annual direct operating cost of the company global portfolio of electricity with the 60% proportional volume allocation to the Las Vegas region ($\$100M \times .25 \times .60$). This 25% adjustment is the result of a review of recent historical market prices of electricity from high carbon intensive sources versus low carbon intensive sources.

Cost of response to risk

87000000

Description of response and explanation of cost calculation

MGM Resorts manages the risk of increased operating costs resulting from total Scope 2 GHG emissions through the following actions: 1. MGM has established the goal of achieving 100% of its U.S. based electricity from renewable resources (80% of global electricity from renewable resources) by 2030 2. MGM has completed a review of available onsite rooftop space suitable for solar photovoltaic (PV) installations in order to source more renewable electricity 3. In 2016 MGM commissioned the final phase of the 8.3-megawatt rooftop solar PV installation at Mandalay Bay in Las Vegas 4. MGM actively supports legislation designed to increase the share of renewable electricity of the wider grid and improve overall energy infrastructure in Nevada, including via SB 358 signed into law in April 2019 and most recently SB 448 signed into law in June 2021 5. MGM works with all energy providers to increase the share of renewable electricity A significant case study is the October 2016 transaction completed by MGM for its Las Vegas properties to exit the sales system of the local utility and source its electricity from the wholesale market. This was adjudicated by the Public Utilities Commission of Nevada (PUCN). Following this transaction MGM announced a partnership with Invenergy to develop a 100 megawatt utility-scale solar PV plant for the exclusive use of its properties. This plant, the "MGM Resorts Mega Solar Array", began commercial operations in May 2021. It has begun to significantly increase the share of electricity sourced from renewable means at the company. The cost of management of \$87.0 million is the one-time exit fee of the October 2016 transaction imposed on MGM by the PUCN. This fee was derived through an extensive analysis of the relative impact of MGM's load at the time in relation to the southern Nevada system as managed by Nevada Power Company "NPC" (MGM's load at the time of the application was approximately 5% of total NPC sales or 1.0B MGM kilowatt hours out of 20.0B kilowatt hours at NPC - i.e. $20.0B / 1.0B = 5\% \times \$1.74B$ utility cost basis = \$87.0M).

Comment

The cost of management is the one-time exit fee paid by MGM Resorts to exit the fully-bundled sales system of NV Energy, the local electric utility in Las Vegas. The transaction enabled MGM to source its electricity from a greater share of renewable resources, thus mitigating the potential effect of rising market prices of fossil-fuel based energy.

Identifier

Risk 2

Where in the value chain does the risk driver occur?

Direct operations

Risk type & Primary climate-related risk driver

Current regulation	Mandates on and regulation of existing products and services
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Primary potential financial impact

Increased direct costs

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

MGM Resorts International operates 9 resort campuses in Las Vegas. Of these, 8 are included in the U.S. Environmental Protection Agency (EPA) Title V Air Emissions Permit of MGM Resorts under the Clean Air Act. These 8 resort campuses include Mandalay Bay, Luxor, Excalibur, MGM Grand, New York New York, Park MGM, CityCenter, and Bellagio in Las Vegas. They collectively total more than 55% of all global MGM Resorts Scope 1 emissions and more than 48% of all global Scope 2 emissions. As holders of this Title V Air Emissions Permit, MGM must adhere to strict operational requirements and regulatory oversight as to the control of air emissions of certain facility assets such as boilers and other heating and cooling equipment. Failure to properly comply carries the climate-related risk of regulatory penalties including fines which would increase operating costs at these 8 Las Vegas resort campuses by up to \$600,000.

Time horizon

Medium-term

Likelihood

Unlikely

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

600000

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial impact figure is a computation of the maximum fine of \$10,000 per day that is impossible under the EPA Title V Air Emissions regulations per the Nevada Division of Environmental Protection (NDEP) multiplied by a 60 day typical period of resolution ($\$10,000 \times 60 \text{ days} = \$600,000$ potential impact at a single resort).

Cost of response to risk

250000

Description of response and explanation of cost calculation

MGM Resorts actively manages the climate-related risks associated with failure to comply with regulatory oversight of its US EPA Title V Air Emissions Permit via the following actions: 1. Development of a complete inventory of all affected assets at each applicable resort 2. Development and deployment of best-practices in operational record keeping of all affected assets 3. Monitoring of air emissions on a continual basis 4. Reporting of air emissions to required regulatory agencies 5. Compliance with on-site audits of regulatory agencies For the reporting year of 2020 MGM Resorts was not subject to any penalties or fines from the U.S. E.P.A. or local regulatory agencies in regard to its EPA Title V Air Emissions Permit. A recent case study of this management is the April 2019 audit that was conducted on behalf of MGM Resorts by an outside party to ensure that the above actions were properly conducted during the 2019 reporting year. The results of the audit included recognition of a commitment of MGM Resorts to invest \$100,000 on resources and systems improvements in furtherance of the above management actions. These resources included and emissions units labelling program, internal procurement system, and a Management of Change (MOC) system written procedures and training. For instance, we implemented an emissions unit labelling program and Management of Change system at our Mandalay Bay Resort and Casino in Las Vegas which was also supported by a corporate procurement system. As a result, the property continued to remain fully in compliance with all applicable regulations. These resources were applicable to all 12 affected properties of MGM Resorts in Las Vegas at the time. The cost of management in the \$100,000 noted above plus \$150,000 (2,000 internal hours at \$75/hour).

Comment**Identifier**

Risk 3

Where in the value chain does the risk driver occur?

Upstream

Risk type & Primary climate-related risk driver

Market	Increased cost of raw materials
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Primary potential financial impact

Increased direct costs

Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

Company-specific description

MGM Resorts International operates 29 unique hotel and resort destinations globally. Electricity is a raw material and direct cost necessary for the provision of hospitality services to hotel and resort guests. The company must purchase approximately 1.1 billion annual kilowatt hours of electricity at an operating cost of \$100 million each year for these facilities. In operating each of its resorts, MGM bears the climate-related risk of lower energy efficient operations, higher energy use and environmental impact, and associated higher costs of electricity as a raw material and direct cost, over time through aging of equipment and building systems. A company-specific example includes the assessment by multiple Las Vegas property operators in 2019/2020 of property central plant chillers and associated pumps and infrastructure. These properties included Mandalay Bay, Luxor, Park MGM, Mirage, Bellagio and MGM Grand. The age of these properties, and their associated equipment as much of it was original installation, necessitated a multi-property review to protect against potential heating and cooling failures that would adversely affect hotel guest comfort and safety as well as higher energy costs as a result of increasingly inefficient operation and higher levels of electricity required for operation. The result was a capital proposal to upgrade multiple chillers at multiple properties in one coordinated project that was presented to MGM senior management and the Board of Directors. The project was implemented and now guards against these risks including escalating energy costs. MGM estimates that without continual review and select upgrade of facility plant and equipment it would use 2% more electricity each year resulting in higher direct costs of \$2.0M.

Time horizon

Medium-term

Likelihood

About as likely as not

Magnitude of impact

Medium

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

2000000

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial impact figure is 2% of the historical annual total cost of electricity of \$100 million. MGM estimates that without active energy conservation investment and efforts, its resorts will use 2% more electricity each year as a result of aging equipment and building systems. This 2% figure was derived through examination of the company's historical trend of electricity usage.

Cost of response to risk

8000000

Description of response and explanation of cost calculation

MGM Resorts actively manages the climate-related risks associated with lower energy efficient operations, higher energy use and environmental impact, and associated higher costs of energy as a raw material, over time through aging of equipment and building systems via the following actions: 1. MGM has established the goal of 30% lower energy use per square foot at its resorts by 2030 2. The MGM Design & Development Facilities Center of Excellence (COE) team manages annual capital and operating budgets dedicated to the deployment of energy efficient measures 3. MGM educates and encourages all employees to take an active role in energy and water conservation A case study of this comprehensive effort of energy conservation is in the company's broad scope to upgrade over 1.5 million light bulbs from legacy technology to highly energy efficient lamps such as light-emitting diodes (LEDs). This has been accomplished through

the execution of Energy Management Plans at each resort. This effort has contributed to total cumulative savings of over 1.9 billion kilowatt hours (kWh) of electricity over the past several years. This is the amount of electricity equivalent to the annual usage of more than 180,000 average US homes. A property-specific case study is the upgrade of more than 400 high-wattage metal halide lamps used to illuminate the exterior of MGM Grand in Las Vegas with a custom, highly efficient LED solution. This project resulted in exterior lighting that is now significantly improved while proving to be 50% more energy efficient than before. This single action saves more than 2.5M annual kWh, the equivalent usage of 238 average U.S. homes. The annual cost of management of \$8.0M was calculated by taking the \$2.0M in avoided increase in annual energy costs multiplied by an average four-year payback on energy conservation investments.

Comment

C2.4

(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes

C2.4a

(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.

Identifier

Opp1

Where in the value chain does the opportunity occur?

Upstream

Opportunity type

Energy source

Primary climate-related opportunity driver

Use of lower-emission sources of energy

Primary potential financial impact

Reduced direct costs

Company-specific description

MGM Resorts International operates 29 unique hotel and resort destinations globally. These destinations are comprised of approximately 93 million square feet of total building area and have a well understood energy demand curve. As a provider of hospitality services and experiences to our guests, we consider electricity expense to be a direct cost necessary for the provision of this service. Carefully structured long-term agreements for renewable energy can provide a significant opportunity for long term energy cost reduction. In fact, in line with this opportunity in 2018, MGM announced a partnership with Invenergy to develop a 100-megawatt utility-scale solar PV plant for the exclusive use of its properties in Las Vegas. This system, the "MGM Resorts Mega Solar Array" began commercial operations in May 2021. This utility scale solar array features over 300,000 panels on 600 acres in Dry Lake Valley, NV (northern Clark County) in a U.S. Bureau of Land Management (BLM) Solar Energy Zone. The array is projected to generate approximately 295K annual megawatt hours (MWh), or 35% of MGM baseline wholesale electricity use of 838K MWh in Las Vegas. At peak production, this array alone will help MGM meet >90% of daytime energy use for entire Las Vegas building portfolio (>65M Square feet), and all power generated is for the exclusive use of Las Vegas properties of MGM Resorts. The financial impact of this array includes an estimated

\$2.65M+ in projected operating savings in 2021 and estimated \$27M+ in net present value savings vs. wholesale electricity prices over the twenty-year PPA term, assuming wholesale prices consistent with 2021 over the full term. In addition, the rooftops, garages and parking spaces of some MGM buildings have been examined for their suitability for the development of onsite solar photovoltaic (PV) systems. These onsite solar PV systems represent opportunity for MGM Resorts to increase the share of its electricity from renewable means and in turn reduce its exposure to higher greenhouse gas (GHG) emissions associated with fossil-fuel based sources of electricity.

Time horizon

Short-term

Likelihood

Virtually certain

Magnitude of impact

Medium

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

27345799

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial impact figure is based upon a Q2 2020 review of forward market rates for wholesale electricity available to MGM Resorts in the Las Vegas area. This review resulted in a positive average variance of \$8.75 per MWh for wholesale electricity vs. the cost of renewable energy in development for 2021 delivery to MGM Resorts. This \$8.75 savings of the renewable energy multiplied by 295,000 projected megawatt hours (MWh) of volume to be produced equals an annualized savings of \$2,581,250 in 2021 (295,000 X \$8.75). The absolute savings on this basis over the full 20-year duration of the Power Purchase Agreement (PPA) is \$51,625,000 (\$2,581,250 X 20 years). The corresponding current single net present value calculation of the full 20-years of absolute annual savings of \$2,581,250 using a 7% discount rate for each of the twenty years results in a net present value of is \$27,345,799 of positive impact at this time.

Cost to realize opportunity

387500

Strategy to realize opportunity and explanation of cost calculation

MGM Resorts undertook the following actions to realize the opportunity available to the company via the use of lower-emission sources of energy: 1. Completed an inventory of available spaces with potential suitability for solar photovoltaic (PV) systems 2. Conducted market research including formal Requests for Proposals (RFPs) for solar PV systems 3. Executed transactions for multiple solar PV systems A recent case study of this effort is the January 2018 announcement of our partnership with Invenergy to establish a 100MW solar array in North Las Vegas. This system, the "MGM Resorts Mega Solar Array" began commercial operation in May 2021. Additionally, in May 2019 we announced that our newest resort, MGM Springfield in Massachusetts has received the world's first LEED Platinum for new construction in the gaming industry. A key component of this certification is the property's 1.13 megawatt solar canopy on the parking garage. The cost to realize these opportunities is calculated at over \$387,500. This is broken down into the following components: 1. \$100,000 – expert consulting and renewable energy market review 2. \$100,000 – outside legal review 3. \$187,500 – Five primary internal company employees at 500 hours each (2,500 hours total) multiplied by an internal rate of \$75/hour

Comment

Identifier

Opp2

Where in the value chain does the opportunity occur?

Direct operations

Opportunity type

Markets

Primary climate-related opportunity driver

Access to new markets

Primary potential financial impact

Increased revenues through access to new and emerging markets

Company-specific description

In Las Vegas MGM Resorts operates 13 resorts. Each of these resorts have rooftop spaces with varying potential for the development of on-site renewable generation such as solar photovoltaic (PV) facilities. The total potential area available is 3,042,827 square feet. This area has the potential to develop up to 31,000 annual megawatt hours (MWh) of solar electricity. In Nevada, there is a state-level system for the tracking and commerce of Nevada-specific Portfolio Energy Credits (PECs) from renewable sources of generated electricity. These PECs are the state equivalent of Renewable Energy Credits (RECs). The PECs are marketed and tracked for the purpose of compliance with the Nevada Renewable Portfolio Standard (RPS). These available PECs are marketable instruments to the multiple organizations that are subject to compliance with the Nevada RPS. As such, MGM has the opportunity to realize increased revenues of up to \$310,000 due to the availability of Portfolio Energy Credits (PECs) PECs being generated at all 13 of its Las Vegas resorts (31,000 X \$10 = \$310,000).

Time horizon

Medium-term

Likelihood

About as likely as not

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

310000

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact figure

The financial impact is an estimate of 31,000 annual Portfolio Energy Credits (PECs) at \$10.00 per PEC. The 31,000 annual PEC volume figure the potential solar photovoltaic (PV) renewable electricity production of 3,042,827 square feet of total available rooftop space across the 13 Las Vegas resorts of MGM Resorts. Nevada has a state-level system to manage inventory and commerce of Nevada-specific Portfolio Energy Credits (PECs) from renewable sources of generated electricity. These PECs are the state equivalent of Renewable Energy Credits (RECs) and are marketed and tracked for the purpose of compliance with the Nevada Renewable Portfolio Standard (RPS). These available PECs are marketable instruments to multiple organizations that subject to compliance with the Nevada RPS. The \$10.00 average value per PEC is based upon review of recent historical transactions in Nevada for Nevada-specific PECs, the state equivalent of Renewable Energy Credits (RECs). In 2020 MGM Resorts participated in a private transaction to sell 17,000 Nevada PECs to another entity at \$10.00 per PEC. This resulted in an increase in revenue to Mandalay Bay in Las Vegas of \$170,000 in 2020. This increased revenue represents expansion into a new market unavailable to MGM in previous years.

Cost to realize opportunity

18750

Strategy to realize opportunity and explanation of cost calculation

MGM Resorts has undertaken the following steps to realize the opportunity of increased revenues associated with the sale of Nevada-specific Portfolio Energy Credits (PECs): 1. Completed the installation of solar PV systems at multiple Las Vegas properties 2. Completed registration with Nevada NV TREC and regional WREGIS online systems of RECs inventory and tracking 3. Conducted research on local and regional Nevada PEC/REC markets including availability and pricing 4. Negotiated transactions with outside parties for the sale of MGM generated Nevada RECs increasing revenue The most relevant case study to date of MGM realizing the opportunity of accessing new and emerging markets is the 2016 completion of the final phase of the rooftop solar PV system at the Mandalay Bay Convention Center in Las Vegas. This system in 2019 generated approximately 25,000 annual Nevada-specific Portfolio Energy Credits (PECs) and in 2020 approximately 18,000 PECs, the Nevada equivalent of Renewable Energy Credits (RECs) for the purpose of compliance with the Nevada Renewable Portfolio Standard (RPS). These available PECs are marketable instruments to the multiple organizations that are subject to compliance with the Nevada RPS. As such, MGM has entered into multiple transactions to sell these PECs and realize increased revenues as a result. The cost to realize this overall opportunity is calculated at \$18,750. This is the value of 250 hours of internal expertise and time undertaken at \$75 per hour.

Comment

Identifier

Opp3

Where in the value chain does the opportunity occur?

Downstream

Opportunity type

Products and services

Primary climate-related opportunity driver

Development and/or expansion of low emission goods and services

Primary potential financial impact

Increased revenues resulting from increased demand for products and services

Company-specific description

In Las Vegas MGM Resorts operates 9 resort campuses. Of these, 5 are major convention center properties: Aria, Bellagio, Mandalay Bay, MGM Grand Las Vegas, and The Mirage. At these 5 major convention resorts in particular, meetings and conventions customers have increasingly requested methods to minimize the greenhouse gas (GHG) emissions and environmental impacts of their meetings held at MGM properties. As such, MGM has the opportunity to exhibit its company leadership in this space and position itself in a better competitive position among the highly impactful meetings and conventions segment of the hospitality industry in Las Vegas. In 2019, MGM had over \$95M in revenue associated with customers directly requesting sustainable event support such as quantification of environmental impact, planning for carbon neutral or zero waste events.

Time horizon

Short-term

Likelihood

Very likely

Magnitude of impact

Medium-high

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

23750000

Potential financial impact figure – maximum (currency)

95000000

Explanation of financial impact figure

Partly driven by customer concerns related to climate-change, in 2019 MGM Resorts had \$95,000,000 of revenue from meetings and conventions customers who directly requested sustainable event support such as quantification of environmental impact, planning for carbon-neutral or zero waste events. The minimum estimate of \$23,750,000 is calculated at \$95,000,000 total revenue from sustainability minded meetings and convention customers multiplied by a projected 25% share that have a specific interest in climate change. The maximum estimate of \$95,000,000 is calculated at \$95,000,000 total revenue from sustainability minded meetings and conventions customers multiplied by a projected 100% share that have a specific interest in climate change.

Cost to realize opportunity

334000

Strategy to realize opportunity and explanation of cost calculation

We are leading the hospitality industry and the private sector in the emerging area of sustainable events. As the host of thousands of events every year, we are well positioned to make a significant impact in this field, particularly as meeting planners are striving to make more deliberate choices that drive societal and environmental benefits from their events. In the past two years, we have worked with more than 70 companies to help them bring their sustainability commitment to their meetings and trade shows. In 2019, \$95 million in revenue was generated by events with a formal sustainable plan or report, and the business is rapidly growing. We have made it easy for clients to make more sustainable choices, including in venue and space, décor and signage, food and beverage and outreach and education. Our program enables a business to tailor its event to match its values. For example, a company might choose a LEED-certified hotel, go carbon-neutral, use digital or recyclable signage, opt for organic produce—or all of the above. Our leadership on sustainable events has attracted the world’s most respected businesses and served as a model for the industry. Globally recognized brands have worked with us to develop their sustainable events. Our VP spoke at COP25 the UN Climate Change Conference on the growing potential of this area. The Events Industry Council invited us to join as a founding partner of the new Centre for Sustainable Events. . Our process included: 1. Conducting research into convention client sustainability needs 2. Creating a formal Sustainable Events Program covering four thematic areas (Venue & Space, Food & Beverage, Decor & Signage and Outreach & Education) and four impact types (Energy & Climate, Water, Materials & Waste, Engagement) 3. Executing multiple formal Sustainable Event Plans. 4. Engaging in industry groups to advance sustainability including through MGM's sponsorship of the Events Industry Council Center for Sustainable Events. One key case study is the Zero-Waste plan executed for the 2019 Subaru National Business Conference at Mandalay Bay in Las Vegas that has been a showcase for the industry. The cost to realize this opportunity has been calculated at \$334,000 with the following breakdown: 1. \$100,000 – direct marketing costs through various media to convention clients 2. \$234,000 – a total of 3,120 hours of internal labor time multiplied by an internal labor rate of \$75 per hour

Comment

C3. Business Strategy

C3.1

(C3.1) Have climate-related risks and opportunities influenced your organization’s strategy and/or financial planning?

Yes

C3.1b

(C3.1b) Does your organization intend to publish a low-carbon transition plan in the next two years?

	Intention to publish a low-carbon transition plan	Intention to include the transition plan as a scheduled resolution item at Annual General Meetings (AGMs)	Comment
Row 1	Yes, in the next two years	No, we do not intend to include it as a scheduled AGM resolution item	MGM Resorts has committed to reduce its combined Scope 1 and Scope 2 greenhouse gas emissions by 50% by 2030 using a 2019 baseline year. In addition, MGM has committed to a target of 100% renewable electricity in its U.S. operations (80% global) also by 2030. Further, these goals have been developed in line with guidance from the Science Based Targets Initiative (SBTi) and submitted for consideration by the Initiative.

C3.2

(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?

Yes, qualitative, but we plan to add quantitative in the next two years

C3.2a

(C3.2a) Provide details of your organization’s use of climate-related scenario analysis.

Climate-related scenarios and models applied	Details

Climate-related scenarios and models applied	Details
2DS Other, please specify (1.5 degrees C)	<p>MGM has done scenario planning as part of our Science Based Target setting. This covers efforts by MGM to reduce our scope 1, 2 and 3 emissions in line with the 1.5 degree scenario. This 1.5 degree scenario includes the assumptions that companies such as MGM are significantly investing in environmentally oriented technological improvements and implementing appropriate behavioral change. However, as of year-end 2020 we have not yet conducted full quantitative scenario analyses focused on climate risk and MGM's potential financial exposure to risks under different future scenarios. We plan to conduct such scenario planning in the next two years. In 2019/2020 MGM engaged World Resources Institute (WRI) to support climate-related scenario analysis for MGM Resorts. Further, MGM engaged ADEC in both 2020 and 2021. Both provided expertise on climate-scenarios to examine. Highlights of this exercise are below: - The Absolute Contraction scenario was selected due to its wide acceptance as a robust form of analysis with methods that are consistent with the level of decarbonization required to keep global temperature below 2°C compared to pre-industrial temperatures. - Inputs to the analysis included the 2019 inventory of Scope 1 and Scope 2 emissions of MGM Resorts International and annual quantified reductions in these emissions consistent with levels necessary to be aligned with the 1.5°C scenario according to the IPCC's Fifth Assessment Report - Other inputs includes a comprehensive inventory of Scope 3 emissions of MGM Resorts including those associated with all relevant sectors - An eleven-year time horizon (2030 target date with a 2019 baseline) was selected to incorporate potential future developments of MGM as well as complement existing intensity targets for energy and carbon emissions reductions at the company (2030 targets with a 2007 baseline). - All areas of company operations under MGM operational control, and thus contributors to MGM Scopes 1-3 emissions, were considered. - The results of the Absolute Contraction scenario analysis included a quantified set of required annual reduction figures in MGM total Scope 1 and Scope 2 emissions (938,044 total metric tonnes in 2019) for the period of 2019-2030 (annual compound annual reduction rate of 4.2% or 46.2% total from 2019 to 2030) - The results also included guidance on setting engagement targets for MGM suppliers (covering \$2.6B in total 2019 spend) - The scenario analysis has informed MGM's strategy on two primary drivers. The first is a growing share of zero or low carbon intense sources of energy. The second is continual energy conservation efforts reducing the overall demand for energy and associated Scope 1 and Scope 2 emissions. - The MGM Procurement team was also engaged on a Scope 3 supplier engagement target. - The single most significant action to date consistent with this strategy is the 2018 announcement of a partnership between MGM Resorts and Invenergy, North America's largest independent renewable energy developer, on a 100 megawatt solar photovoltaic (PV) array in Clark County, Nevada for the exclusive use of the Las Vegas properties of MGM Resorts. Completed in May 2021, this array will significantly lower the carbon emissions of MGM Resorts operations. - Also, as a direct result of this scenario analysis and its outcomes, in May 2019 MGM Springfield in Massachusetts announced that it is the first property in the gaming industry to be awarded a LEED Platinum certification by the U.S. Green Building Council. A significant enabler of the LEED Platinum rating is the property's new solar array, commissioned in 2020, which now supplies renewable electricity to the facility. - Further, discussions are ongoing on means to source zero or low carbon intensive sources of energy in new development projects.</p>

C3.3

(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.

Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	<p>In Las Vegas MGM Resorts operates 9 resort campuses. Of these, 5 are major convention center properties: Aria, Bellagio, Mandalay Bay, MGM Grand Las Vegas, and The Mirage. At these 5 major convention resorts in particular, meetings and conventions customers have increasingly requested methods to minimize the greenhouse gas (GHG) emissions and environmental impacts of their meetings held at MGM properties. MGM has taken the climate related opportunity to provide low emissions services to these customers and incorporated this into our business strategy. We have developed a robust Sustainable Events Program to engage and support major convention clients with interest in sustainability including related to carbon neutral, zero waste and low food waste events. We expect these product offerings to continue to expand over the next 1-2 years in particular. A case study of the most substantial strategic influence was the decision to host the Subaru Zero Waste Event at Mandalay Bay in Las Vegas in June 2019. This convention was undertaken with the goal of achieving zero waste to landfill and lower carbon emissions associated with better materials management. This was achieved through careful analysis of all incoming materials and consideration of final destinations including reuse, composting, recycling donation or upcycling, and high level consideration of the embodied carbon associated with certain material choices. Also partly driven by our concerns related to climate change (and strong awareness that reducing food waste is a major solution in the fight against climate change), we have developed a comprehensive food waste management program. This includes measurement, reduction and diversion from landfill or incineration of a large number of food waste types (prepared perishable food, unprepared perishable food, non-perishable food & beverages, yellow grease, brown grease, food scraps, oysters, coffee grounds, compostable food & beverage packaging). We have established an industry-leading program in this area. Over the years we have developed a world class food waste management program that has led to the diversion of over 200,000 tons of food and beverage from landfills or incineration to multiple environmentally preferable and climate-friendly destinations such as: animal farms, composting sites, biofuel refiners, oyster aquaculture providers, etc.</p>
Supply chain and/or value chain	Evaluation in progress	<p>Since 70.3% of the 2020 Scope 3 greenhouse gas (GHG) emissions of MGM Resorts are attributed to purchased goods and services, we have started to place more emphasis on conducting assessments on how suppliers manage energy and GHG emissions within their operations. MGM is currently assessing whether suppliers' energy management activities could pose a risk to our operating costs and determining the strategic approach to engage our suppliers in emissions reduction activities, as a way to better manage the climate-related impacts across our full value chain. This work is anticipated to be in the medium-term time frame. In 2020, MGM formally decided to explore usage of the CDP supply chain of up to 10,000 suppliers as part of our climate risk assessment and emission reduction program. Though we did not proceed to join the CDP Supply Chain program in 2020, we are intending to review this decision again with our Social Impact & Sustainability Division and Facilities teams for 2021 and expect to make our final decision in 2021.</p>
Investment in R&D	Yes	<p>The majority of the operations of MGM Resorts are located in Las Vegas, a city in the Mojave Desert region that continues to have significant challenges in managing domestic water supplies and water consumption. The current drought on the Colorado River system is a direct climate-related risk with vital implications to the region. In response to this risk, MGM has incorporated water tactics into its overall climate strategy, primarily over the short and medium-term time horizons. The company has undertaken multiple actions to actively promote water conservation over the 2007-2020 period. These efforts have resulted in a cumulative savings of more than 8.0 B gallons from 2007 – 2020. Further, with recognition of the high climate-related risk in water supplies in the Mojave Desert and the company goal to help mitigate them as the decision driver, MGM Resorts has made direct research and development investments in this area, outside of company operations. These investments have been in the short and medium term time horizons and have been made via contributions to water-oriented organizations such as WaterStart, Springs Preserve, and ONE Drop. A case study of the most substantial strategic decision made to date influenced by climate-related physical risk of drought is our decision to support ONE Drop, which has given to research and development to support improved access to water, sanitation, and hygiene (WASH) in regions of need. In 2019 ONE Drop reported that more than 98,000 inhabitants from the rural and peri-urban communities of Colombia, Guatemala, Mexico, Nicaragua, and Paraguay were direct beneficiaries of research and development funding, in part from MGM Resorts, in these WASH priorities.</p>

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Operations	Yes	<p>There are substantial climate-related risks to the operations of MGM Resorts in the failure to adapt to changing energy market conditions such as higher direct costs of fossil-fuel electricity. This has directly impacted the climate strategy at MGM Resorts in that the company has adopted the practice of proactively considering prior practices in light of more efficient options. Correspondingly, there are opportunities to demonstrate climate-related leadership by taking prudent risks and being willing to adapt operating practices in areas where material improvements may be made in climate-related impacts. This also has directly influenced the climate strategy at the company. For instance, all properties of MGM Resorts use substantial amounts of energy in their operation. Globally, MGM procures approximately 1.1 billion kilowatt hours (kWh) of electricity each year at total spend of about \$100 million. This is the source of the 509,131 metric tonnes of Scope 2 emissions for 2020. Substantial volatility in the price of grid-based electricity presents both financial (in terms of rising costs) and climate-related (in terms of higher fossil-fuel based sources of electricity) risks. A case study of the most substantial decision to date in the long-term time frame is that in October 2016 MGM Resorts completed an exit from the fully-bundled sales system of NV Energy, the local electricity utility in southern Nevada. The primary driver behind the decision to take this action was to gain the ability to directly source a larger share of renewable energy for the exclusive use of the company. Since this time, the Las Vegas properties of MGM Resorts have sourced electricity on the wholesale power market. NV Energy continues to provide transmission, distribution, and electrical grid ancillary services to MGM Resorts. This transaction resulted in the 2018 announcement of a partnership for renewable energy with Chicago-based Invenergy to develop a 100 MW solar photovoltaic (PV) array north of Las Vegas that will be exclusively dedicated to the properties of MGM Resorts on the Las Vegas Strip. This project completed in May 2021, will result in significant mitigation of the environmental impact of energy sourced at MGM Resorts.</p>

C3.4

(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.

	Financial planning elements that have been influenced	Description of influence

	Financial planning elements that have been influenced	Description of influence
Row 1	Direct costs	<p>MGM Resorts International is dedicated to helping protect our planet. As such, climate-related issues, including both risks and opportunities, are continuously under evaluation and incorporated into our overall business objectives and financial planning. Tactics taken as a direct result of this process are in the short, medium, and long-term time horizons. A key climate-related risk MGM Resorts is subject to is the potential for higher electricity costs in the future as a direct result of high carbon-intensive generation sources being affected by inflationary pressures, including potential carbon taxes and other climate-related factors. As a provider of hospitality services and experiences to its guests, MGM Resorts considers electricity and other energy expenses to be a direct cost in the provision of these services. MGM has carefully considered this risk, and in turn, set the business objective to increase the proportion of low or zero carbon-intensive generation sources in its overall portfolio of electricity procurement. The most substantial business decision made in this regard, in direct support of this business objective, was in 2021 MGM set the target of receiving a minimum of 100% of its U.S. electricity from renewable resources by 2030 (80% globally). Further, MGM in 2021 committed to reduce its combined Scope 1 and Scope 2 absolute emissions by 50% by 2030, using a 2019 baseline year. These two targets directly influenced tactics taken in the short, medium, and long-term time horizons. As such, the business strategy at MGM Resorts incorporated these energy and emissions reduction targets. The business strategy has incorporated management of direct greenhouse gas emissions as a key aspect of climate change. Applicable elements are incorporated into the annual budgeting process and overall financial plan via projections of energy expenditures. A key case study deployed over the long-term time horizon to meet the business objective of reducing this climate-related risk of potential higher future electricity costs is the 2018 announcement between MGM Resorts International and Invenergy, North America's largest independent renewable energy company, to develop a utility-scale 100-megawatt (MW) solar photo-voltaic (PV) plant 25 miles north of Las Vegas for the exclusive use of the Las Vegas properties of MGM Resorts. The primary driver behind the decision to take this action was to gain the ability to directly source a larger share of renewable energy for the exclusive use of the company. This project, the "MGM Resorts Mega Solar Array" became operational in May 2021. It will result in a significant portion of our company's electricity demand coming directly from a designated renewable energy facility and play the key role in meeting the above-mentioned 100% U.S. renewable electricity target by 2030 (80% globally). It will also have a positive effect on the company's financial planning by helping to mitigate the risk of increasing fossil-fuel based sources of energy. Also, as part of our Energy Management Program, we invested over \$50M in energy efficiency between 2007 and 2020 with an annual focus on the short and medium-term time horizons. Select highlights include: - More than 1.9 billion kilowatt hours (kWh) of electricity cumulatively saved over the past eleven years, the equivalent to the annual usage of more than 180,000 average U.S. homes - More than 8.1 billion gallons of water cumulatively saved over the past ten years, the equivalent volume as contained in 12,000 Olympic-sized swimming pools</p>

C3.4a

(C3.4a) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).

C4. Targets and performance

C4.1

(C4.1) Did you have an emissions target that was active in the reporting year?

Both absolute and intensity targets

C4.1a

(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.

Target reference number

Abs 1

Year target was set

2020

Target coverage

Company-wide

Scope(s) (or Scope 3 category)

Scope 1+2 (location-based)

Base year

2019

Covered emissions in base year (metric tons CO2e)

938043

Covered emissions in base year as % of total base year emissions in selected Scope(s) (or Scope 3 category)

97

Target year

2030

Targeted reduction from base year (%)

50

Covered emissions in target year (metric tons CO2e) [auto-calculated]

469021.5

Covered emissions in reporting year (metric tons CO2e)

708817

% of target achieved [auto-calculated]

48.8732392864719

Target status in reporting year

New

Is this a science-based target?

Yes, we consider this a science-based target, but it has not been approved by the Science-Based Targets initiative

Target ambition

1.5°C aligned

Please explain (including target coverage)

MGM Resorts International began the process of investigating and setting a Science-based absolute target in 2018. MGM engaged with World Resources Institute (WRI) and set an absolute target intended to comply with the "well below two degrees Celsius scenario" using a baseline year of 2019 and a target year of 2034. Following further review and guidance from ADEC Innovations in 2020/2021, MGM revised this absolute target to instead comply with the most ambitious "1.5 degrees Celsius aligned scenario". The revised target

is a reduction of absolute Scope 1 and Scope 2 emissions of 50% by 2030, using a baseline year of 2019. The 2019 baseline emissions inventory excludes one property that was divested at the end of that year. This target is presently being reviewed for approval by the Science-Based Targets Initiative (SBTi). We have followed the guidelines established by the SBTi. However, at the time of CDP submission the target has not yet been formally approved by the SBTi.

C4.1b

(C4.1b) Provide details of your emissions intensity target(s) and progress made against those target(s).

Target reference number

Int 1

Year target was set

2017

Target coverage

Company-wide

Scope(s) (or Scope 3 category)

Scope 1+2 (location-based)

Intensity metric

Metric tons CO₂e per square foot

Base year

2007

Intensity figure in base year (metric tons CO₂e per unit of activity)

30.2

% of total base year emissions in selected Scope(s) (or Scope 3 category) covered by this intensity figure

100

Target year

2025

Targeted reduction from base year (%)

45

Intensity figure in target year (metric tons CO₂e per unit of activity) [auto-calculated]

16.61

% change anticipated in absolute Scope 1+2 emissions

-16

% change anticipated in absolute Scope 3 emissions

Intensity figure in reporting year (metric tons CO₂e per unit of activity)

16.9

% of target achieved [auto-calculated]

97.8660779985284

Target status in reporting year

Underway

Is this a science-based target?

No, but we are reporting another target that is science-based

Target ambition

<Not Applicable>

Please explain (including target coverage)

In 2020 MGM Resorts recognized twelve years of formal progress in company leadership in sustainability and environmental responsibility. The Corporate Sustainability Division (CSD) was established in 2007, providing a twelve-year track record of achievement. As such, the target established during the reporting year 2017 is to continue our reduction in Scope 1 and Scope 2 emissions per square foot, normalized for divested/acquired operations, to a total of 45% by the year 2025, with 2007 as the baseline year. As of year-end 2020, the actual reduction in Scope 1 and Scope 2 emissions per square foot, normalized for divested/acquired operations, since 2007 is 44.2%, making the target well on track.

Target reference number

Int 2

Year target was set

2017

Target coverage

Company-wide

Scope(s) (or Scope 3 category)

Scope 1+2 (location-based)

Intensity metric

Metric tons CO₂e per square foot

Base year

2007

Intensity figure in base year (metric tons CO₂e per unit of activity)

30.2

% of total base year emissions in selected Scope(s) (or Scope 3 category) covered by this intensity figure

100

Target year

2030

Targeted reduction from base year (%)

50

Intensity figure in target year (metric tons CO₂e per unit of activity) [auto-calculated]

15.1

% change anticipated in absolute Scope 1+2 emissions

-20

% change anticipated in absolute Scope 3 emissions**Intensity figure in reporting year (metric tons CO₂e per unit of activity)**

16.9

% of target achieved [auto-calculated]

88.0794701986755

Target status in reporting year

Underway

Is this a science-based target?

No, but we are reporting another target that is science-based

Target ambition

<Not Applicable>

Please explain (including target coverage)

In 2020 MGM Resorts recognized twelve years of formal progress in company leadership in sustainability and environmental responsibility. The Corporate Sustainability Division (CSD) was established in 2007, providing a twelve-year track record of achievement. As such, the target established during the reporting year 2017 is continue our reduction in Scope 1 and Scope 2 emissions per square foot, normalized for divested/acquired operations, to a total of 50% by the year 2030, with 2007 as the baseline year. As of year-end 2020, the actual reduction in Scope 1 and Scope 2 emissions per square foot, normalized for divested/acquired operations, since 2007 is 44.2%, making the target well on track.

C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?

Other climate-related target(s)

C4.2b

(C4.2b) Provide details of any other climate-related targets, including methane reduction targets.

Target reference number

Oth 1

Year target was set

2017

Target coverage

Company-wide

Target type: absolute or intensity

Intensity

Target type: category & Metric (target numerator if reporting an intensity target)

Energy consumption or efficiency | MWh

Target denominator (intensity targets only)

square foot

Base year

2007

Figure or percentage in base year

30.9

Target year

2025

Figure or percentage in target year

23.2

Figure or percentage in reporting year

21

% of target achieved [auto-calculated]

128.571428571429

Target status in reporting year

Underway

Is this target part of an emissions target?

Yes, it is part of our emissions target of 45% reduction in total carbon emissions per square foot by 2025, using 2007 as the baseline year (designated as Int 1). This separate target of a reduction in energy usage of 25% by 2025, using 2007 as the baseline year (designated as Oth 1) is a key contributor to the emissions target as energy usage is a primary component of total carbon emissions.

Is this target part of an overarching initiative?

Science Based Targets initiative

Please explain (including target coverage)

Yes, it is part of the Science-based Targets initiative (SBTi) of 50.0% absolute reduction in total carbon emissions by 2030, using 2019 as the baseline year (pending final approval by the SBTi). This separate target of a reduction in energy usage of 25% by 2025, using 2007 as the baseline year (designated as Oth 1) is a key contributor to the SBTi as energy usage is a primary component of total carbon emissions and the absolute SBT.

Target reference number

Oth 2

Year target was set

2017

Target coverage

Company-wide

Target type: absolute or intensity

Intensity

Target type: category & Metric (target numerator if reporting an intensity target)

Energy consumption or efficiency | MWh

Target denominator (intensity targets only)

square foot

Base year

2007

Figure or percentage in base year

30.9

Target year

2030

Figure or percentage in target year

21.6

Figure or percentage in reporting year

21

% of target achieved [auto-calculated]

106.451612903226

Target status in reporting year

Underway

Is this target part of an emissions target?

Yes, it is part of our emissions target of 50% reduction in total carbon emissions per square foot by 2030, using 2007 as the baseline year (designated as Int 1). This separate target of a reduction in energy usage of 30% by 2030, using 2007 as the baseline year (designated as Oth 2) is a key contributor to the emissions target as energy usage is a primary component of total carbon emissions.

Is this target part of an overarching initiative?

Science Based Targets initiative

Please explain (including target coverage)

Yes, it is part of the Science-based Targets initiative (SBTi) of 50.0% absolute reduction in total carbon emissions by 2030, using 2019 as the baseline year (pending final approval by the SBTi). This separate target of a reduction in energy usage of 30% by 2030, using 2007 as the baseline year (designated as Oth 2) is a key contributor to the SBTi as energy usage is a primary component of total carbon emissions and the absolute SBT.

Target reference number

Oth 3

Year target was set

2018

Target coverage

Business activity

Target type: absolute or intensity

Absolute

Target type: category & Metric (target numerator if reporting an intensity target)

Waste management	metric tons of waste diverted from landfill
------------------	---

Target denominator (intensity targets only)

<Not Applicable>

Base year

2019

Figure or percentage in base year

14820

Target year

2030

Figure or percentage in target year

7410

Figure or percentage in reporting year

14820

% of target achieved [auto-calculated]

0

Target status in reporting year

Underway

Is this target part of an emissions target?

No - this is a separate target.

Is this target part of an overarching initiative?

Other, please specify (EPA Food Loss & Waste Champions)

Please explain (including target coverage)

In 2018, MGM became an EPA Food Loss & Waste Champion. We committed to reducing food loss and waste in our operations by 50 percent by 2030 through activities targeting the prevention of food loss and waste before it arises, recovery of wholesome, otherwise wasted food for donation, and recycling of food loss and waste to other uses such as animal feed, compost and energy generation. Specifically, we committed to the following activities: 1. Audits of food waste in landfill. 2. Source reduction in employee dining rooms and during events 3. Feeding people through a comprehensive food donations program 4. Feeding animals through a comprehensive food to feed program 5. Biofuel production through repurposing yellow grease and brown grease 6. Composting program development As part of the activity #1 in the list above, in 2019 we conducted an extremely detailed audit of the food waste in our landfill stream. This was to help us establish a baseline volume of food products hidden within our landfill stream (i.e. not diverted through our multiple food waste diversion programs). This audit conducted by a leading third party waste characterization and measurement firm led us to conclude that approximately 27% of our materials to landfill in the USA was food waste. This translated to 14,820 tons of food waste to landfill as our U.S. baseline in 2019. Our commitment to reduce this by 50% by 2030 implies a goal of less than 7,410 tons of food waste to landfill by 2030. We will track progress to this goal by conducting similarly detailed audits in 2023, 2027 and 2030. .

C4.3

(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Yes

C4.3a

(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	15	8727
To be implemented*	10	2555
Implementation commenced*	5	925
Implemented*	7	3025
Not to be implemented	0	0

C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

Initiative category & Initiative type

Energy efficiency in buildings	Heating, Ventilation and Air Conditioning (HVAC)
--------------------------------	--

Estimated annual CO2e savings (metric tonnes CO2e)

2301

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

383727

Investment required (unit currency – as specified in C0.4)

264522

Payback period

<1 year

Estimated lifetime of the initiative

11-15 years

Comment

Energy Management Implementation Systems (EMIS) at multiple MGM domestic properties (6).

Initiative category & Initiative type

Energy efficiency in buildings	Heating, Ventilation and Air Conditioning (HVAC)
--------------------------------	--

Estimated annual CO2e savings (metric tonnes CO2e)

723

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency – as specified in C0.4)

111429

Investment required (unit currency – as specified in C0.4)

500000

Payback period

4-10 years

Estimated lifetime of the initiative

11-15 years

Comment

Replaced a legacy Building Management System (BMS), installed variable frequency drives (VFDs), and optimized central plant operations with proven control strategies.

C4.3c

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

Method	Comment
--------	---------

Method	Comment
Dedicated budget for energy efficiency	The MGM Facilities Center of Excellence (COE) was first established in 2019 at MGM Resorts and oversees and implements a dedicated annual energy conservation capital budget for projects throughout the company.
Financial optimization calculations	The optimization of the dedicated energy reduction capital budget considers both financial and emission reduction benefits within the prioritization of projects.
Compliance with regulatory requirements/standards	Compliance within MGM Resorts EPA Title V permit is also a contributing factor to the deployment of capital within the scope of these projects.
Employee engagement	The MGM Facilities Center of Excellence (COE) and MGM Social Impact and Sustainability teams work extensively on non-capital required efforts that result in emissions reductions activities. The most significant example is the 2018-2021 partnership between MGM and Invenergy, North America's largest independent renewable energy company, to develop a 100 megawatt solar photovoltaic (PV) array in Clark County, Nevada for the exclusive use of the Las Vegas properties of MGM Resorts. This array began commercial operations in May 2021. It is being capitalized by Invenergy, with no capital outlay by MGM. MGM is the exclusive off-taker of all energy produced through a power purchase agreement (PPA) with Invenergy.

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?

Yes

C4.5a

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.

Level of aggregation

Company-wide

Description of product/Group of products

We help convention customers estimate the carbon emissions associated with their events at our properties. We also estimate the relative emissions reduction associated with hosting a convention at an MGM facility vs. other similar venues.

Are these low-carbon product(s) or do they enable avoided emissions?

Avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Other, please specify (We have an internal process of projecting volumes of electricity, natural gas, and waste associated with specified events at our properties. These volumes are then converted into greenhouse gas emissions figures using the overall CDP methodology.)

% revenue from low carbon product(s) in the reporting year

1

% of total portfolio value

<Not Applicable>

Asset classes/ product types

<Not Applicable>

Comment

Specific revenue share is not determined at this time.

C5. Emissions methodology

C5.1

(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

Scope 1

Base year start

January 1 2007

Base year end

December 31 2007

Base year emissions (metric tons CO2e)

169979

Comment

Total Scope 1 emissions in calendar 2007; includes all property operations in effect during this year, including select operations that have since been divested.

Scope 2 (location-based)

Base year start

January 1 2007

Base year end

December 31 2007

Base year emissions (metric tons CO2e)

687083

Comment

Total Scope 2 emissions in calendar 2007; includes all property operations in effect during this year, including select operations that have since been divested.

Scope 2 (market-based)

Base year start

Base year end

Base year emissions (metric tons CO2e)

Comment

C5.2

(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

C6. Emissions data

C6.1

(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO₂e?

Reporting year

Gross global Scope 1 emissions (metric tons CO₂e)

199686

Start date

<Not Applicable>

End date

<Not Applicable>

Comment

C6.2

(C6.2) Describe your organization's approach to reporting Scope 2 emissions.

Row 1

Scope 2, location-based

We are reporting a Scope 2, location-based figure

Scope 2, market-based

We are reporting a Scope 2, market-based figure

Comment

Total gross Scope 2 emissions (location-based) include all MGM global operations under MGM Resorts operational control and Scope 2 emissions associated with market or grid purchased electricity. Total gross Scope 2 emissions (market-based) include all MGM purchases of electricity generated on site from the solar photovoltaic (PV) system (behind the meter) at Mandalay Bay in Las Vegas.

C6.3

(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO₂e?

Reporting year

Scope 2, location-based

509131

Scope 2, market-based (if applicable)

0

Start date

<Not Applicable>

End date

<Not Applicable>

Comment

Total gross global Scope 2 emissions (location-based) figure includes all emissions associated with market or grid purchased electricity for all global MGM operations under MGM control. Total gross Scope 2 emissions (market-based) figure include zero emissions associated with energy purchased from the on-site solar photovoltaic (PV) system at Mandalay Bay in Las Vegas.

C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

No

C6.5

(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services**Evaluation status**

Relevant, calculated

Metric tonnes CO2e

511708

Emissions calculation methodology

Scope 3 emissions from purchased goods and services were estimated using aggregated spend data provided by MGM's procurement department. Spend data was broken down into relevant industry sector categories. USA data was converted to equivalent emissions using USA-specific emissions factors as determined by the U.S. Environmental Protection Agency (EPA). China data was converted to equivalent emissions through input into the Scope 3 Evaluator tool from Quantis. Spend data includes purchased goods and services.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions from purchased goods and services were estimated using aggregated spend data provided by MGM's procurement department.

Capital goods

Evaluation status

Relevant, calculated

Metric tonnes CO2e

268855

Emissions calculation methodology

Scope 3 emissions from purchased goods and services were estimated using aggregated spend data provided by MGM's procurement department. Spend data was broken down into relevant industry sector categories. USA data was converted to equivalent emissions through input into the Scope 3 Evaluator tool from Quantis. China data was converted to equivalent emissions through input into the Scope 3 Evaluator tool from Quantis. Spend data includes purchased goods and services.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Capital goods include assets such as machinery.

Fuel-and-energy-related activities (not included in Scope 1 or 2)**Evaluation status**

Relevant, calculated

Metric tonnes CO2e

281295

Emissions calculation methodology

Relevant fuels included in the fuel-and-energy-related activities scope 3 analysis include natural gas, diesel, gasoline, jet fuel, compressed natural gas, propane, and electricity generated in both the United States and China. All fuel volumes were converted to kilowatt hours and emissions were calculated using a template provided from the World Resources Institute (WRI).

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

All data obtained from utility meters or other supplier and company reports.

Upstream transportation and distribution**Evaluation status**

Relevant, calculated

Metric tonnes CO2e

10962

Emissions calculation methodology

Scope 3 emissions from purchased goods and services were estimated using aggregated spend data provided by MGM's procurement department. Spend data was broken down into relevant industry sector categories. USA data was converted to equivalent emissions using USA-specific emissions factors as determined by the U.S. Environmental Protection Agency (EPA). China data was converted to equivalent emissions through input into the Scope 3 Evaluator tool from Quantis. Spend data includes purchased goods and services.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Emissions from third-party transportation and logistics.

Waste generated in operations

Evaluation status

Relevant, calculated

Metric tonnes CO2e

14180

Emissions calculation methodology

These emissions were calculated by applying the emission factor for mixed municipal solid waste to landfill as provided by the EPA Waste Reduction Model (version 15), Management Practices Chapters (relevant Exhibits). The EPA Waste Reduction Model (version 15), Management Practices Chapters (relevant Exhibits) also provides for calculation of Scope 3 credits attributable to recycled volumes. All landfilled waste was assumed to be mixed Municipal Solid Waste (MSW).

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Waste volumes were generated from multiple waste management providers and partners. These emissions were calculated by applying the emission factor for mixed municipal solid waste to landfill as provided by the EPA Waste Reduction Model (version 15), Management Practices Chapters (relevant Exhibits).

Business travel**Evaluation status**

Relevant, calculated

Metric tonnes CO2e

2459

Emissions calculation methodology

Business travel data in total miles traveled was obtained from MGM Resorts business travel partners. This was segmented into total business air miles traveled short-haul (less than 300 miles), medium-haul (between 300 miles and 2,500 miles) and long-haul (more than 2,500 miles). The appropriate emission factor for each segment was obtained via the EPA Emission Factors for Greenhouse Gas Inventories, March 2018; Table 8.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Business travel data in total miles traveled was obtained from MGM Resorts business travel partners. This was segmented into total business air miles traveled shorty-haul (less than 300 miles), medium-haul (between 300 miles and 2,500 miles) and long-haul (more than 2,500 miles). The appropriate emission factor for each segment was obtained via the EPA Emission Factors for Greenhouse Gas Inventories, March 2018; Table 8.

Employee commuting**Evaluation status**

Relevant, calculated

Metric tonnes CO2e

20400

Emissions calculation methodology

This data was estimated using the Scope 3 Evaluator tool from Quantis, based on companies in the hotel and hospitality industry with over 10,000 employees.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

This data was estimated using the Scope 3 Evaluator tool from Quantis, based on companies in the hotel and hospitality industry with over 10,000 employees.

Upstream leased assets

Evaluation status

Relevant, calculated

Metric tonnes CO2e

0

Emissions calculation methodology

Scope 3 emissions from purchased goods and services were estimated using aggregated spend data provided by MGM's procurement department. Spend data was broken down into relevant industry sector categories. USA data was converted to equivalent emissions using USA-specific emissions factors as determined by the U.S. Environmental Protection Agency (EPA). China data was converted to equivalent emissions through input into the Scope 3 Evaluator tool from Quantis. Spend data includes purchased goods and services.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

No emissions from upstream leased assets in 2020.

Downstream transportation and distribution

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

As a hospitality organization in a service industry, MGM Resorts has no material downstream transportation and distribution activities.

Processing of sold products

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

As a hospitality organization in a service industry, MGM Resorts has no material processing of sold products activities.

Use of sold products

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

As a hospitality organization in a service industry, MGM Resorts has no material processing of sold products activities.

End of life treatment of sold products**Evaluation status**

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

As a hospitality organization in a service industry, MGM Resorts has no material end of life treatment of sold products activities.

Downstream leased assets**Evaluation status**

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

As a hospitality organization in a service industry, MGM Resorts has no material downstream leased assets activities.

Franchises**Evaluation status**

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain

As a hospitality organization in a service industry, MGM Resorts has no material franchises activities.

Investments

Evaluation status

Not relevant, explanation provided

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

As a hospitality organization in a service industry, MGM Resorts has no material investment activities relevant.

Other (upstream)

Evaluation status

Not evaluated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

Other (downstream)

Evaluation status

Not evaluated

Metric tonnes CO2e

<Not Applicable>

Emissions calculation methodology

<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

Please explain

C6.7

(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

C6.10

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Intensity figure

0.0001373

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

708817

Metric denominator

unit total revenue

Metric denominator: Unit total

5162082000

Scope 2 figure used

Location-based

% change from previous year

83.1

Direction of change

Increased

Reason for change

The reason for the increase in intensity of combined Scope 1 and Scope 2 emissions emitted per unit of total revenue in U.S. dollars is a decrease in revenue of 60% from 2019 to 2020. Revenue decreased due to direct impacts on business operations from the global Covid-19 pandemic.

C7. Emissions breakdowns

C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Yes

C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	199480.31	IPCC Fourth Assessment Report (AR4 - 100 year)
CH4	93.99	IPCC Fourth Assessment Report (AR4 - 100 year)
N2O	112.03	IPCC Fourth Assessment Report (AR4 - 100 year)
HFCs	0	IPCC Fourth Assessment Report (AR4 - 100 year)

C7.2

(C7.2) Break down your total gross global Scope 1 emissions by country/region.

Country/Region	Scope 1 emissions (metric tons CO2e)
United States of America	194111
China, Macao Special Administrative Region	5575
Japan	0
Middle East	0

C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.
By business division

C7.3a

(C7.3a) Break down your total gross global Scope 1 emissions by business division.

Business division	Scope 1 emissions (metric ton CO2e)
MGM Nevada operations	136353
MGM China	5575
MGM regional operations - MS and MI	15454
MGM regional operations - East	42304

C7.5

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low-carbon electricity, heat, steam or cooling accounted for in Scope 2 market-based approach (MWh)
United States of America	375385	0	974956	7661
China, Macao Special Administrative Region	133746	0	169174	0
Japan	0	0	0	0
Middle East	0	0	0	0

C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.
By business division

C7.6a

(C7.6a) Break down your total gross global Scope 2 emissions by business division.

Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
MGM Nevada operations	269710	0
MGM China	133746	0
MGM regional operations - MS and MI	51036	0
MGM regional operations - East	54639	0

C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?
Decreased

C7.9a

(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	23439	Decreased	2.42	For its Las Vegas properties that had access to the wholesale market for electricity, in the reporting year 2020 a larger share of renewable electricity was incorporated into the overall portfolio of electricity procured. The result was a decrease of 23,439 metric tons CO2e due to this increase in renewable electricity. In 2019, our gross global emissions (Scope 1 and 2) were 968,070 metric tons CO2e. Therefore, we decreased our gross global emissions 2.42% in 2020 as a result. Formula: $(23,439 / 968,070) \times 100 = 2.42\%$.
Other emissions reduction activities	3025	Decreased	0.31	MGM Resorts International reduced Scope 1 and 2 combined emissions by 3,025 metric tons due to implemented emissions reduction activities in the reporting year 2020. In 2019, our gross global emissions (Scope 1 and 2) were 968,070 metric tons CO2e. Therefore, we reduced our gross global emissions 0.31% in 2020 as a result. Formula: $(3,025 / 968,070) \times 100 = 0.31\%$.
Divestment	30027	Decreased	3.1	In 2019 MGM Resorts divested Circus Circus Las Vegas. This resulted in a decrease of Scope 1 and Scope 2 combined emissions of 30,027 in the reporting year 2020. In 2019 our gross global emissions (Scope 1 and 2) were 968,070 metric tons CO2e. Therefore, we reduced our gross global emissions 3.10% in 2020 as a result. Formula: $(30,027 / 968,070) \times 100 = 3.10\%$.
Acquisitions	22824	Increased	2.36	In 2020 MGM Resorts recognized the first full calendar year of the acquisitions of Northfield Park in Ohio and Empire City in New York. This resulted in an increase of Scope 1 and Scope 2 combined emissions of 22,824 in the reporting year 2020. In 2019 our gross global emissions (Scope 1 and 2) were 968,070 metric tons CO2e. Therefore, we increased our gross global emissions 2.36% in 2020 as a result. Formula: $(22,824 / 968,070) \times 100 = 2.36\%$.
Mergers		<Not Applicable>		
Change in output		<Not Applicable>		
Change in methodology		<Not Applicable>		
Change in boundary		<Not Applicable>		
Change in physical operating conditions		<Not Applicable>		
Unidentified		<Not Applicable>		
Other	225586	Decreased	23.3	In 2020 the business operations and associated used of energy were reduced as a direct result of the Covid-19 global pandemic. This resulted in a decrease in Scope 1 and Scope 2 combined emissions of 225,586 in the reporting year 2020. In 2019 our gross global emissions (Scope 1 and 2) were 968,070 metric tons CO2e. Therefore, we reduced our gross global emissions 23.30% in 2020 as a result. Formula: $(225,586 / 968,070) \times 100 = 23.30\%$.

C7.9b

(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Location-based

C8. Energy

C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy?

More than 0% but less than or equal to 5%

C8.2

(C8.2) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	Yes
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	Yes
Generation of electricity, heat, steam, or cooling	Yes

C8.2a

(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	0	844455	844455
Consumption of purchased or acquired electricity	<Not Applicable>	196872	924731	1121603
Consumption of purchased or acquired heat	<Not Applicable>	0	96205	96205
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	5278	17249	22527
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	0	<Not Applicable>	0
Total energy consumption	<Not Applicable>	202150	1882640	2084790

C8.2b

(C8.2b) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	No
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	Yes

C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Fuels (excluding feedstocks)

Natural Gas

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

774737

MWh fuel consumed for self-generation of electricity

<Not Applicable>

MWh fuel consumed for self-generation of heat

592534

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

182203

Emission factor

0.05311

Unit

metric tons CO2e per million Btu

Emissions factor source

For 2020/2019: EPA Emission Factors for Greenhouse Gas Inventories, March 2020; For 2018, 2017: EPA Emission Factors, March 2018; WRI - Calculation Tool for Direct Emissions from Stationary Combustion. Version 4.1 (2016, 2015 and 2014), Version 4.0 (2013/2012/2011/2010).

Comment

The volume of natural gas fuel consumed for self-cogeneration or self-trigeneration is the volume utilized by the combined heat and power plant at ARIA in Las Vegas for self-cogeneration.

Fuels (excluding feedstocks)

Propane Liquid

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

13712

MWh fuel consumed for self-generation of electricity

<Not Applicable>

MWh fuel consumed for self-generation of heat

13712

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

0

Emission factor

0.06171

Unit

metric tons CO2e per million Btu

Emissions factor source

For 2020/2019: EPA Emission Factors for Greenhouse Gas Inventories, March 2020; For 2018, 2017: EPA Emission Factors, March 2018; WRI - Calculation Tool for Direct Emissions from Stationary Combustion. Version 4.1 (2016, 2015 and 2014), Version 4.0 (2013/2012/2011/2010).

Comment

Propane utilized primarily in the Macau region.

Fuels (excluding feedstocks)

Petrol

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

7913

MWh fuel consumed for self-generation of electricity

<Not Applicable>

MWh fuel consumed for self-generation of heat

0

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

0

Emission factor

0.03267

Unit

metric tons CO₂e per liter

Emissions factor source

WRI - Calculation Tool for Direct Emissions from Stationary Combustion. Version 4.1 (2020, 2019, 2018, 2017, 2016, 2015 and 2014), Version 4.0 (2013/2012/2011/2010).

Comment

All MWh of Petrol consumption is for moving vehicles. Emission factor shown above is metric tons CO₂e per liter, converted from metric tons CO₂e per gallon of .00863 as reported by the source tool above.

Fuels (excluding feedstocks)

Diesel

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

4267

MWh fuel consumed for self-generation of electricity

<Not Applicable>

MWh fuel consumed for self-generation of heat

0

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

0

Emission factor

0.03846

Unit

kg CO2 per liter

Emissions factor source

WRI - Calculation Tool for Direct Emissions from Stationary Combustion. Version 4.1 (2020, 2019, 2018, 2017, 2016, 2015 and 2014), Version 4.0 (2013/2012/2011/2010).

Comment

Emission factor shown above is metric tons CO2e per liter, converted from metric tons CO2e per gallon of .01016 as reported by the source tool above.

Fuels (excluding feedstocks)

Aviation Gasoline

Heating value

HHV (higher heating value)

Total fuel MWh consumed by the organization

43826

MWh fuel consumed for self-generation of electricity

<Not Applicable>

MWh fuel consumed for self-generation of heat

0

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

0

Emission factor

0.03165

Unit

metric tons CO2e per liter

Emissions factor source

WRI - Calculation Tool for Direct Emissions from Stationary Combustion. Version 4.1 (2020, 2019, 2018, 2017, 2016, 2015 and 2014), Version 4.0 (2013/2012/2011/2010).

Comment

Emission factor shown above is metric tons CO2e per liter, converted from metric tons CO2e per gallon of .00836 as reported by the source tool above.

(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

	Total Gross generation (MWh)	Generation that is consumed by the organization (MWh)	Gross generation from renewable sources (MWh)	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	68191	68191	7661	7661
Heat	42204	42204	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

C8.2e

(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero emission factor in the market-based Scope 2 figure reported in C6.3.

Sourcing method

Power purchase agreement (PPA) with on-site/off-site generator owned by a third party with no grid transfers (direct line)

Low-carbon technology type

Solar

Country/area of consumption of low-carbon electricity, heat, steam or cooling

United States of America

MWh consumed accounted for at a zero emission factor

7661

Comment

Off-grid energy consumption from an on-site installation or through a direct line to an off-site generator owned by another company.

C9. Additional metrics

C9.1

(C9.1) Provide any additional climate-related metrics relevant to your business.

Description

Waste

Metric value

8003

Metric numerator

Metric tons CO2e from food waste in landfill

Metric denominator (intensity metric only)

% change from previous year

Direction of change

<Not Applicable>

Please explain

Based on a detailed food waste audit in 2019, we estimate that in 2019 there was 14,820 tons of food waste in our landfill stream. Based on the EPA WARM tool, this equates to 8003 tons of carbon emissions. We did not conduct a detailed food waste audit in 2020, but plan to complete in the future.

C10. Verification

C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S1-S2 GHG Verification Statement FINAL 20200824.pdf](#)

Page/ section reference

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

C10.1b

(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Scope 2 approach

Scope 2 location-based

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S1-S2 GHG Verification Statement FINAL_20200824.pdf](#)

Page/ section reference

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

C10.1c

(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Scope 3 category

Scope 3: Purchased goods and services

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S3 GHG Verification Statement_20201208.pdf](#)

Page/section reference

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

Scope 3 category

Scope 3: Capital goods

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S3 GHG Verification Statement 20201208.pdf](#)

Page/section reference

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

Scope 3 category

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S3 GHG Verification Statement 20201208.pdf](#)

Page/section reference

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Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

Scope 3 category

Scope 3: Waste generated in operations

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S3 GHG Verification Statement 20201208.pdf](#)

Page/section reference

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

Scope 3 category

Scope 3: Business travel

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S3 GHG Verification Statement 20201208.pdf](#)

Page/section reference

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

Scope 3 category

Scope 3: Upstream transportation and distribution

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Limited assurance

Attach the statement

[MGM CY 2019 S3 GHG Verification Statement 20201208.pdf](#)

Page/section reference

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

Scope 3 category

Scope 3: Employee commuting

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Underway but not complete for reporting year – previous statement of process attached

Type of verification or assurance

Please select

Attach the statement[MGM CY 2019 S3 GHG Verification Statement 20201208.pdf](#)**Page/section reference**

1-3

Relevant standard

Corporate GHG verification guidelines from ERT

Proportion of reported emissions verified (%)

100

C10.2**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

Yes

C10.2a**(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?**

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C6. Emissions data	Financial or other base year data points used to set a science-based target	Third-party consultant review.	In 2020 MGM engaged with ADEC Innovations in the development of a Science-based Target (SBT). This work included a complete review of MGM 2019 emissions and relevant financial and other benchmarking data in preparation of and Absolute Contraction Science-based target consistent with the level of decarbonization required to keep global temperature increase below 1.5°C compared to pre-industrial temperatures. This work continued in 2021.

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C8. Energy	Renewable energy products	Power Purchase Agreement (PPA).	MGM entered into a power purchase agreement (PPA) with NRG (now Clearway) for the exclusive use of the energy generated by a 8.3 megawatt solar photovoltaic (PV) system atop the Mandalay Bay Convention Center in Las Vegas. Metering information is done third-party and verified by Clearway.
C1. Governance	Emissions reduction activities	Environment & Social (E&S) rating by ISS Corporate Solutions.	In 2018 MGM began participation in the Environment & Social (E&S) rating by ISS Corporate Solutions. This service is a comprehensive rating platform including Risks and Opportunities, Carbon and Climate, Natural Resources, and Waste and Toxicity disclosures.
C4. Targets and performance	Financial or other base year data points used to set a science-based target	Third-party consultant review.	In 2020 MGM engaged with ADEC Innovations in the development of a Science-based Target (SBT). This work included a complete review of MGM 2019 emissions and relevant financial and other benchmarking data in preparation of and Absolute Contraction Science-based target consistent with the level of decarbonization required to keep global temperature increase below 1.5°C compared to pre-industrial temperatures. This work continued in 2021.

C11. Carbon pricing

C11.1

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

No, and we do not anticipate being regulated in the next three years

C11.2

(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?

Yes

C11.2a

(C11.2a) Provide details of the project-based carbon credits originated or purchased by your organization in the reporting period.

Credit origination or credit purchase

Credit origination

Project type

Solar

Project identification

MGM Resorts does not participate in a formal carbon emissions scheme; however, we do create and trade State of Nevada Portfolio Energy Credits (PECs). We do so in partnership with NRG Energy (now Clearway as of 2019) and in the following way: [1] In 2020 we operated a 6.4 MW solar photovoltaic (PV) facility on the Mandalay Bay Convention Center Roof (Phase I of the project). [2] In 2020 that array generated 6,988 MWh of renewable energy which is the equivalent of 2,724 mtCO₂e. [3] Instead of retiring these credits ourselves and claiming the renewable energy generation / carbon avoidance, we traded the PECs with a counterparty under Nevada State regulations.

Verified to which standard

Other, please specify (State of Nevada Renewable Portfolio Standard)

Number of credits (metric tonnes CO₂e)

2724

Number of credits (metric tonnes CO₂e): Risk adjusted volume

2724

Credits cancelled

Yes

Purpose, e.g. compliance

Compliance

C11.3

(C11.3) Does your organization use an internal price on carbon?

Yes

C11.3a

(C11.3a) Provide details of how your organization uses an internal price on carbon.**Objective for implementing an internal carbon price**

Drive low-carbon investment
Identify and seize low-carbon opportunities

GHG Scope

Scope 2

Application

MGM actively analyzes the source of its energy with the objective to increase the share of energy generated from renewable resources in the future. As such, financial analytics utilize a price of carbon in the form of market price characteristics for fossil-fuel energy as well as renewable energy.

Actual price(s) used (Currency /metric ton)

20

Variance of price(s) used

Uniform pricing is used.

Type of internal carbon price

Shadow price

Impact & implication

MGM's shadow pricing on carbon has been used to inform MGM's business strategy on the procurement of renewable energy. In October 2016 MGM Resorts completed an exit from the fully-bundled sales system of NV Energy, the local electric utility in Las Vegas after conducting financial analyses including carbon pricing estimates. This transaction enables MGM to control its portfolio of electricity serving its Las Vegas properties (more than 80% of the hotel rooms of MGM are in Las Vegas) and access the wholesale market for electricity. As such, in 2018 MGM announced a partnership with Invenergy, North America's largest independent renewable energy company, to develop a 100-megawatt solar photovoltaic (PV) system in Clark County, Nevada for the exclusive use of the Las Vegas properties of MGM. This system began commercial operation in May 2021 and will materially increase the percentage of renewable energy in the overall energy portfolio of MGM Resorts. In the future, MGM intends to examine other renewable energy options. In doing so, MGM has established an internal price of carbon via financial analyses designed to interpret market pricing characteristics of both fossil-fuel generated energy, as well as renewable energy.

C12. Engagement

C12.1

(C12.1) Do you engage with your value chain on climate-related issues?

Yes, our customers

Yes, other partners in the value chain

C12.1b

(C12.1b) Give details of your climate-related engagement strategy with your customers.

Type of engagement

Education/information sharing

Details of engagement

Share information about your products and relevant certification schemes (i.e. Energy STAR)

% of customers by number

30

% of customer - related Scope 3 emissions as reported in C6.5

Portfolio coverage (total or outstanding)

<Not Applicable>

Please explain the rationale for selecting this group of customers and scope of engagement

In the hospitality industry business and convention clients represent the most significant customer demand for sustainability and climate-related information and options from the hotels and meetings facilities visited. This is affirmed through multiple channels of direct customer feedback as well as via direct customer requests. As such, MGM Resorts has specifically targeted the business and convention segment in our climate-related engagement strategy. While COVID-19 made a significant dent on our convention business

in 2020, we still selected a number of major convention clients for direct engagement on climate related products and services through our Sustainable Events program. We are a major host of business events in Las Vegas which is the global capital of business events. Our highly respected Sustainable Event Program is discussed with many major convention clients. In 2020, we engaged convention clients with a total revenue value of over \$12 Million in our sustainable events program.

Impact of engagement, including measures of success

The impact of this engagement with business and convention guests is identified and measured on a number of levels. First, a key impact to MGM Resorts has been the development of a customized reporting service that calculates the direct quantities of greenhouse gas (GHG) emissions resulting from a particular convention or meeting held at an MGM Resorts property. One key case study is the Zero-Waste plan executed for the 2019 Subaru National Business Conference at Mandalay Bay in Las Vegas that has been a showcase for the industry. Further, options are presented to the client including advice on carbon impacts of events, and key mitigation methods. A guest may take specific climate-mitigation action including the selection of lower carbon food, beverage, and decor options. A guest may also elect to purchase of carbon offsets for selected events. The measure of success at MGM Resorts is the identification of revenue specifically associated with the engagement. In 2020 MGM Resorts had \$12.0M in revenue from the convention clients participating in this climate-related strategy. A key measure of success in the future will be to grow this \$12.0M revenue figure.

C12.1d

(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.

At MGM Resorts we serve as a major hub for the global business events industry and the global travel industry. We leverage business events to engage on climate change in two specific ways: (1) helping individual events understand and manage their event-related carbon footprints and (2) driving increased understanding and action on climate across the events sector as a whole.

Examples of these efforts are provided below:

1. As an illustrative example of how we help individual events advance environmental sustainability and understand and manage their event-related carbon footprints: in early 2020 we actively supported Forbes Travel Week with a comprehensive event sustainability program. Forbes Travel Week is an extremely high profile gathering of C-Suite executives from the global luxury hospitality industry. The 2020 event was hosted at ARIA Resort and the MGM sustainability team helped our client not only implement a comprehensive event sustainability plan for the event itself, but also chose to actively educate, communicate and engage with these influential attendees. The plan included but was not limited to:

- a. Forecasting all venue, room and flight related emissions
- b. Identifying credible carbon offsets to neutralize those emissions
- c. Sponsoring the purchase of those emissions for our client

- d. Hosting multiple tours to help attendees understand the climate and other benefits of LEED certification (ARIA is the world's largest privately funded LEED certified development)
- e. Presenting to attendees on luxury hospitality and sustainability, and why the luxury hospitality industry can and should do more on sustainability and climate

2. As an illustrative example of how we help drive increased understanding and action on climate across the events sector as a whole, in early 2020 MGM's VP of Corporate Sustainability was appointed Chair of the Event Industry Committee for Sustainability & Social Impact. The EIC has more than 30 member organizations representing over 103,500 individuals and 19,500 firms and properties. The EIC Committee for Sustainability & Social Impact serves as the primary entity working on these topics for the event sector as a whole. Example efforts undertaken in 2020 to engage peers on climate as part of MGM's leadership role in this Event Industry collaboration included, but is not limited to:

- a. Engaging the UN Climate Change Secretariat on sector-wide options for climate action
- b. Developing a long-term strategic plan with an event industry commitment and action journey for climate
- c. Planning a guidebook for Measuring & Managing Event Carbon Footprints
- d. Hosting multiple educational sessions on sustainability and events
- e. Helping develop strong climate-related content within the Sustainable Events Professional Certificate, the primary educational program for event professionals interested in sustainability and sustainability professionals interested in events.

C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?

- Direct engagement with policy makers
- Trade associations
- Funding research organizations
- Other

C12.3a

(C12.3a) On what issues have you been engaging directly with policy makers?

Focus of legislation	Corporate position	Details of engagement	Proposed legislative solution
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Focus of legislation	Corporate position	Details of engagement	Proposed legislative solution
Energy efficiency	Support	Energy Efficiency Policy – MGM Resorts International actively supports legislation at State and Federal levels to encourage utility and end-user energy efficiency measures as well as the use of combined heat and power; managing utility tariffs; and developing lighting policy standards through the U.S. Department of Energy (DOE).	MGM Resorts has provided input on several energy efficiency and sustainability bills in Nevada. These have included programs to promote energy conservation at both the residential and commercial levels of local utility systems.
Other, please specify (Water conservation)	Support	Water Conservation and Awareness - including funding access to clean water for impoverished communities; developing educational programs locally about the importance of water conservation and working with regional municipalities to develop sound water policy.	MGM provides funding to several water conservation, awareness and outreach efforts, including WaterStart, Springs Preserve, and ONE Drop.
Clean energy generation	Support	Renewable Energy Policy – including interactions with the Nevada State Legislature and the Governors Panel on climate change, the Harry Reid Blue Ribbon Energy Panel, the Southern Nevada Solar Energy Lab Development Committee, and frequent interactions with our state representatives for input on energy related issues.	MGM Resorts has provided input on several renewable energy related bills in Nevada. Most notably, in April 2019, MGM supported SB 358, a measure to raise renewable energy generation standards to 50% by 2030. Most recently, MGM supported SB 448, a measure meant to improve Nevada's standing in the renewable energy industry, in May 2021.
Other, please specify (Climate change awareness)	Support	Climate Change and Environmental Sustainability Awareness - including participation with the World Travel and Tourism Council and International Tourism Partnership to standardize measurement and communications of Greenhouse Gas Emissions to guests across the hospitality industry; as well as providing input and guidance for the WTTC in developing sustainability policy and direction.	MGM has supported the adoption of the HCMI standards across the industry.

C12.3b

(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?

Yes

C12.3c

(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.

Trade association

Impact NV (www.impact-nv.org), (formally GreenChips), Nevada's Sustainability Alliance. Impact NV is Southern Nevada's leading sustainability voice creating innovative partnerships among businesses, government, and non-profits through education, community projects, and collaboration.

Is your position on climate change consistent with theirs?

Consistent

Please explain the trade association's position

ImpactNV is a 501(c)(3) non-profit catalyst organization, founded in 2008, that is dedicated to building community through collaborative partnerships for a more sustainable future. Sustainability is, in many facets, a transformational word. It is transformative first in that the understanding of what it means to be “sustainable” has changed over several decades. Originally defined as the productive harmony between humans and nature that was necessary to guarantee the flourishing of mankind, sustainability has since taken on far more meaning. The economy, health, nature, built environment, energy, community, social equity, and transportation now make up the components that ensure the endurance of prosperity. Impact NV’s position is that Sustainability is best achieved through cooperation among business, government, and non-profits through education, community projects, and collaboration.

How have you influenced, or are you attempting to influence their position?

MGM Resorts is a founding member of Impact NV, with Company executives servicing on both the Board of Directors as well as the working group of the non-profit organization. The mission of Impact NV is consistent with the objective of MGM Resorts to be a positive influence in the each of the communities in which we do business. MGM uses this position to promote energy efficiency, renewable energy infrastructure, and community awareness for organizations who help meet these ends within the community.

Trade association

Sustainable Purchasing Leadership Council (SPLC).

Is your position on climate change consistent with theirs?

Consistent

Please explain the trade association’s position

SPLC works to advance sustainable purchasing policies and practices, including those that drive long term supply chain emissions reductions.

How have you influenced, or are you attempting to influence their position?

MGM’s Vice President of Corporate Sustainability was the Founding Chair of SPLC and has influenced the organization’s focus on prioritizing sustainable purchasing activities in produce categories of highest embedded environmental impacts.

Trade association

ReFED

Is your position on climate change consistent with theirs?

Consistent

Please explain the trade association’s position

ReFED is a multi-stakeholder nonprofit, powered by an influential network of the nation’s leading business, nonprofit, foundation, and government leaders committed to reducing U.S. food waste. ReFED takes a data-driven approach to move the food system from acting on instinct to insights to solve our national food waste problem. As food waste solutions are implemented, there will likely be a corresponding reduction in climate impacts.

How have you influenced, or are you attempting to influence their position?

MGM’s Vice President of Corporate Sustainability is Chair of the governance Committee at ReFED.

C12.3d

(C12.3d) Do you publicly disclose a list of all research organizations that you fund?

No

C12.3e

(C12.3e) Provide details of the other engagement activities that you undertake.

MGM Resorts continues to engage activities to develop and support sustainable practices in the regulatory arenas on the local, state, and national levels. These efforts include active guidance and participation in Impact NV, formally Green Chips (www.impact-nv.org), a public/private non-profit partnership dedicating to promotion sustainability in Southern Nevada, the Clark County Department of Air Quality (DAQEM), Nevada State Legislature, the U.S. Department of Energy's Better Buildings Alliance Efficiency Forum, Commercial Real Estate Energy Alliance (CREEA), Events Industry Council (EIC) Center for Sustainable Events, Sustainable Purchasing Leadership Council, and others.

C12.3f

(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

Our environmental policy establishes priorities for the company and serves as the foundation for ensuring that all engagement is consistent through the review and consultation process. If any engagement is determined inconsistent, this would be identified by the CSR Committee of the Board and other key stakeholders, and then all engagement activities would cease or be addressed as appropriate.

C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication

In mainstream reports

Status

Complete

Attach the document

[2020-MGM Annual Report-Color-FINAL.pdf](#)

Page/Section reference

7, 8, 11, 12

Content elements

Governance

Strategy

Risks & opportunities

Comment

C15. Signoff

C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	Chief People, Inclusion & Sustainability Officer	Chief Sustainability Officer (CSO)