## **Equal Employment Opportunity Policy**

Policy / Procedure No.: POL\_499\_Human Resources\_Employment & Labor Relations\_Equal Employment

Opportunity Policy\_079

Version: Final Division: Human Resources

Audience: All Issuing Department: Employment & Labor Relations

## **Purpose**

This policy states that all qualified employees have the same opportunities available to them regardless of sex, race, color, national origin, ancestry, age, religion, veteran status, disability, perceived disability, sexual orientation, union affiliation, genetic information, gender identity or expression, transgender status, or any other status or classification protected by law, and what to do if an employee feels that he or she has faced discrimination in the workplace.

## Scope

This policy applies to all MGM Resorts International employees, and is adopted by and applicable to all employees of MGM Resorts International subsidiaries and/or affiliated entities ("the Company").

## **Policy**

MGM Resorts is committed to a policy of equal employment opportunity for all of its employees. This Equal Employment Opportunity Policy ("Policy") shall apply to each of its domestic and foreign subsidiaries and affiliated companies. All Company personnel (including hourly, salaried, supervisory, managerial, and executive, regardless of title or position) shall adhere to the principles of this policy in compliance with all applicable federal, state, and local laws, rules, and regulations governing fair employment.

Company employment opportunities shall be open to all qualified applicants. Employment decisions and actions shall be made solely on the basis of individual merit and achievement, job performance, training, experience, and qualifications – without regard to sex, race, color, national origin, ancestry, age, religion, veteran status, disability, perceived disability, sexual orientation, union affiliation, genetic information, gender identity or expression, transgender status, or any other status or classification protected by law. This policy applies to all employees – including hourly, salaried, supervisory, managerial, and executive, regardless of title or position, and to all employment policies, practices, decisions and actions concerning the terms and conditions of employment at MGM Resorts companies – including recruitment, interviewing, hiring, job/shift assignment, training and development, pay, benefits, promotion, transfer, discipline, demotion, layoff, and termination.

Any employee who believes he/she has been discriminated against in the workplace is expected to report or make a complaint about the matter immediately to his/her direct supervisor or department manager, or to any member of his/her Company's Human Resources department, including Employee Relations staff; the Director of Human Resources (where applicable); or Vice President of Human Resources. If the employee or individual is uncomfortable reporting the

conduct to his/her supervisor or department manager or the Human Resources department, he or she may report the matter to any member of senior management (Vice President and above) of the Company at which he or she is employed. An employee who believes that he or she is being discriminated against or harassed *may also, but is not obligated to* notify the offender that his or her behavior is unwelcome and should stop, although such a confrontation is not always appropriate or advisable.

All supervisors and managers are required to immediately report any complaint (formal or informal) they receive of discrimination, or any such incidents the supervisor or manager witnesses, to the Human Resources department, Employee Relations, or the Vice President of Human Resources.

The Company shall promptly investigate all reported incidents which may be a violation of this policy. The Company will keep reported complaints and related investigations confidential to the maximum extent possible and appropriate. Employees who submit discrimination, harassment, or retaliation complaints are urged to maintain the confidentiality of such matters. The Company will be the sole and final decision maker as to whether the conduct complained of violates this policy. Any employee found to have engaged in unlawful discrimination will be subject to appropriate disciplinary action, up to and including separation of employment. The Company will advise the complainant (employee who submitted the complaint) of the conclusion and results of the investigation, to the extent appropriate any remedial or corrective action and any other information that the Company deems relevant.

The Company prohibits any form of retaliation against an employee who brings a complaint of discrimination, or who cooperates in the Company's investigation of such a complaint.

If an investigation results in a finding that the complaining employee falsely accused another of discrimination knowingly or in a malicious manner, the complainant will be subject to appropriate sanctions, up to and including separation of employment.

Employees who have questions or concerns about the Equal Employment Opportunity Policy should address them to their supervisors or Human Resources department.

Procedure			
N/A			
Supporting documents			
N/A			