



COMPLIANCE CHARTER

MGM RESORTS INTERNATIONAL (the “Company”) is committed to maintaining a compliance program that has as its key elements policies and procedures for each of the following areas: financial compliance; gaming regulatory compliance; anti-money laundering compliance and the advancement of responsible gaming. The Company has a designated Chief Compliance Officer and a BSA Anti-Money Laundering Officer to ensure all aspects of its compliance programs are identified. The Company is committed to an ongoing review for enhancements to the program, which is intended to be fluid.

The Anti-Money Laundering (“AML”) program is commensurate with the risks posed by the environment in which the Company and its gaming affiliates operate. The Company is committed to maintaining a comprehensive risk-based BSA/AML program that includes effective internal controls and procedures to comply with applicable Title 31 requirements, regulatory guidance and measures reasonably designed to prevent its casinos from being used for money laundering or other criminal activity. Included within such measures, the Company will not hesitate to bar a patron Company-wide if the Compliance Department believes there is a strong likelihood that the patron is using an illegal source of funds, is using the casino to facilitate criminal activity or otherwise poses too great a BSA/AML risk. Legal compliance and ethical business practices are at the core of our business. No business opportunity is worth the potential risk of becoming involved in money laundering. The Company never puts profits ahead of compliance.

The AML program has key elements for its program that includes controls to identify PEPs, monitor for OFAC and SDN individuals and companies, and to prohibit the use of the Company for any terrorist financing pass throughs. PEPs who may be identified through the related Know-Your-Customer (“KYC”) reviews by compliance staff or marketing staff must have a full due diligence profile completed and reviewed by senior management of the Company to ensure funds remitted are commensurate with available income earned outside of the PEPs government position. Customer Due Diligence and Enhanced Due Diligence reports are compiled by compliance staff who may utilize third party subscriber services to generate reports based on native country information of the related patron. All related AML documents are maintained for a minimum of five years so assistance can be provided to any audit team or law enforcement team who may require such detail information.

The Company has a corporate Code of Conduct that is updated annually and approved by the Audit Committee of the Board of Directors. The code sets forth standards of conduct and expectations for employees to ensure the integrity of company operations.

MGM Resorts International is committed to the communities it operates, the patrons it maintains relationships with and its employees. A cornerstone to this commitment is evidenced in the GameSense responsible gaming platform to educate and engage with patrons about the risk of gaming. GameSense is prominently displayed throughout our casinos, and employees are trained to be aware of responsible gambling indicators and how to direct patrons to materials or casino staff who can assist with these issues. Further the Company maintains self-exclusion lists of patrons who have identified a gaming problem, and the Company will not solicit, encourage or entice these patrons to gamble at any properties of MGM Resorts International.