



MGM RESORTS INTERNATIONAL®

Political Expenditures Policy

MGM Resorts International (“MGM Resorts” or “the Company”) encourages active participation in the U.S. political process. Federal, state, and local public policy decisions have the potential to meaningfully impact our business, employees, customers, and surrounding community. As a result, we engage constructively, legally, and ethically with political candidates, and in support of legislative issues and ballot initiatives that are integral to the Company’s strategic objectives and core values. Where legally permissible and deemed appropriate, this engagement may include political expenditures.

Policy Scope

This Political Expenditure Policy governs U.S. political expenditures made by the Company, its wholly owned subsidiaries, and the MGM Resorts International Federal Political Action Committee (PAC).

Political Expenditure Defined

For purposes of this Policy, a “political expenditure” is defined as any payment, gift, loan, or deposit of money or anything of value, made to influence the election of a candidate for federal, state, or local political office, or to influence a ballot initiative, including an independent expenditure.

Guidelines Governing Political Expenditures

Federal, state, and local, laws restrict or regulate the Company’s ability to make political expenditures. Certain jurisdictions also may prohibit or otherwise regulate expenditures made by its directors and certain employees.

MGM Resorts makes corporate monetary and non-monetary political expenditures where permitted by law and through the MGM Resort International Federal PAC using funds provided by certain MGM Resorts employees and shareholders. In addition, MGM Resorts financially supports and is a member of trade associations that engage in political activity, including lobbying and political giving.

The Company abides by the following practices and policies:

- All political expenditures made by the Company must be approved by the Company’s Senior Vice President, Government Affairs and General Counsel.
- When determining whether to approve a political expenditure, the Company considers whether it will further the Company’s policy objectives and priorities. The Company will make determinations irrespective of a candidate or ballot measure’s partisan affiliation.

- When making political expenditures, the Company follows all applicable laws; never uses improper means to attempt to influence a political outcome; and differentiates between MGM Resorts personnel's personal political views and those of the Company.
- A political expenditure exceeding \$100,000 must be reported to the Nominating/Corporate Governance Committee of MGM Resorts International's Board of Directors within 30 days of such contribution.

Political Expenditure Disclosure

MGM Resorts disfavors a lack of transparency and publicly reports its political expenditures as required by law. In addition, starting on June 30, 2020, MGM Resorts will make publicly available on its website semiannual reports including the following information:

- A listing of monetary and non-monetary political expenditures made by MGM Resorts International and any of its wholly owned subsidiaries, which shall include the amount and recipient of each such expenditure;
- A listing of political expenditures made through the MGM Resorts International PAC, which shall include the amount and recipient of each such expenditure; and
- A listing of trade association membership dues paid during such reporting period that are allocated toward non-deductible activities under Section 162(e) of the Internal Revenue Code.