



VICI PROPERTIES INC. - CORPORATE SOCIAL RESPONSIBILITY POLICY (NYSE:VICI)

Our Commitment

VICI Properties Inc. and its affiliates (the “Company”) are committed to contributing to the improvement of economic, environmental and social conditions through our business activities regardless of geographic location, within the scope of our capabilities, and consistent with applicable laws and regulations, and our Code of Business Conduct. We strive to foster open dialogue with and active participation by our stakeholders in supporting human rights and social progress as part of our business practices, including the ongoing development, implementation and evaluation of this policy. This Corporate Social Responsibility Policy (the “CSR Policy”) will be reviewed on a regular basis to account for changes in our business and any legal or regulatory requirements.

Environmental Sustainability; Labor, Health and Safety

We are a socially and environmentally conscious organization and operate in compliance with local laws and regulations regarding environmental compliance, labor, health and safety.

Environmental opportunities, risks and programs are managed strategically by our environmental sustainability and social responsibility team which reports directly to the Nominating and Governance Committee of the Board of Directors of the Company (the “Board of Directors”) and is imbued with authority to design and implement environmental management systems for our Company. This cross-functional team includes input from key management functions such as finance, operations, legal and accounting, and is responsible for monitoring our environmental performance, facilitating environmental sustainability efforts, and communicating with stakeholders. We promote energy efficiency in our corporate headquarters and our golf operations by shutting down all lighting and computer systems every day, maintain an active recycling program, including the recycling of wastepaper products, glass, metal and electronics, and focus on sustainable water use through water conservation, and the use of natural sources of water and reclaimed water. We encourage employees to seek out and utilize recycled content and reduced packaging options where available and feasible. Environmental management plans inform our operations in order to promote the sustainable use of resources and improve environmental performance.

We are committed to contributing to sustainable economic development and responsible business practices by working with our employees, our communities, and our tenants. We comply with all applicable laws and industry standards on health and safety, wage and working hours, including overtime, and benefits. Our compensation is competitive and fair in the markets in which we operate. We do not engage in forced labor or abuse of labor, including physical abuse of employees and any form of compelled labor or child labor. Pursuant to our Code of Business Conduct, we do not tolerate any illegal discrimination or harassment or any kind, including, without limitation, on the basis of race, creed, color, religion, national origin, nationality, sex, gender identity, gender expression, sexual orientation or age. All employment practices and decisions, including those involving recruiting, hiring, transfers, promotions, compensation, benefits, discipline and termination, are conducted without regard to race, creed, color, religion, national origin, nationality, sex, gender identity, gender expression, sexual orientation or age.

All employees are responsible and accountable for contributing to a safe working environment, including fostering safe working attitudes, conducting business in an environmentally responsible manner, and striving to ensure that the social and environmental commitments of our Company are reflected in our dealings with third parties.

Human Rights; Human Trafficking

We proactively seek to minimize human rights risks in all activities of the Company. We are committed to supporting the United Nations Guiding Principles on Business and Human Rights and the Protocol to Prevent, Suppress and Punish Trafficking in Persons throughout our operations and are committed to supporting the efforts of our tenants and operators to abide by these principles in the operations of our properties. These protocols and related instruments specifically address the protection of the human rights of individuals belonging to specific groups or populations that require particular attention, including, indigenous peoples; women; national or ethnic, religious and linguistic minority groups; children; persons with disabilities; and migrant workers and their families.

The Company strongly supports eliminating human trafficking, which is a crime involving exploitation of persons for the purposes of compelled labor or a commercial sex act through the use of force, fraud, or coercion, and, where a person younger than 18 years old is induced to perform a commercial sex act, it is a crime regardless of whether there is any force, fraud, or coercion. The Company strictly prohibits employees from engaging in human trafficking-related activities, including, without limitation, sex trafficking, using force, fraud, or coercion to subject a person to involuntary servitude or obtaining labor from persons by threats of serious harm to that person or another person. In addition, the Company also prohibits employees from engaging in practices related to trafficking in persons, including, without limitation, denying access to or destroying an employee's identity or immigration documents and failing to provide an employment contract or other employment documentation where required by law. Any director, officer or employee having credible knowledge of a violation of this CSR Policy or human trafficking at any of our properties must report such information immediately.

Business Integrity; Anti-Money Laundering

Pursuant to our Code of Business Conduct, we do not permit any Company officer, employee, director, agent or family member of such officer, employee, director or agent to offer, give, provide or accept any gift or entertainment unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations. We do not permit the use of bribes, other fraudulent practices or criminal behavior.

Our policy is to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. We do not open or maintain customer accounts within the meaning of 31 CFR 1023.100, in that we do not establish formal relationships with "customers" for the purpose of effecting transactions in securities. In connection with payments to our service providers, our accounting department collected the information necessary to conduct ongoing monitoring to identify and report suspicious transactions.

Engagement of Stakeholders

We actively engage our primary stakeholders through a comprehensive stakeholder engagement program and informal, regular communication. Our primary stakeholders include our stockholders, our employees, and our tenants. Our engagement is tailored to each stakeholder group, as applicable, and may include surveys, one-on-one communication, investor conferences, and ongoing partnerships. Stakeholders are also actively encouraged to engage with the Company directly through outreach to our investor relations team, our legal department, our operations team and our human resources team.

Suppliers

We consider and evaluate our suppliers taking into consideration their ability to abide by the principles set forth in this CSR Policy and our Code of Business Conduct. We set forth our reasonable expectations for the business practices of our suppliers in our Responsible Supplier Principles. In addition, we are committed to working with suppliers who are dedicated to excellence in their respective fields, and include and support suppliers that represent diverse backgrounds, experiences, expertise and skills to assist us in supplying and growing our business. When available and feasible, we seek out opportunities to advance economic inclusion and to work with minority and women-owned or disadvantaged business enterprises.

Education and Training Opportunities

We believe that our environmental sustainability and social responsibility efforts are supported by education and training that promote values, beliefs and attitudes that contribute to the ability of individuals to uphold their own rights and protect the rights of others, and provide opportunities to develop and retain knowledge on environmental, and health and safety issues. We intend to regularly offer education opportunities, training and communications to our employees on various issues, including data security, diversity, harassment, and environmental sustainability.

Reporting

The Company encourages all of its officers, employees, directors and other stakeholders to speak with management, supervisors or other appropriate personnel regarding any apparent misconduct or violations of this CSR Policy. In addition, we partner with an unaffiliated vendor to monitor a confidential and secure online and telephonic reporting structure whereby our employees may report any concerns. You may submit any concerns via the internet at <http://viciproperties.ethicspoint.com>, via hotline at 1-844-620-4032, to the legal department at corplaw@viciproperties.com, or by speaking directly to a member of the management team. The Company does not permit retaliation against any employee who, in good faith, and in accordance with our procedure, reports any act of apparent misconduct.

Amendments and Modifications

This CSR Policy is not intended to amend or replace our Code of Business Conduct or any other codes of conduct or policies of the Company. This CSR Policy may be amended, altered, supplemented, revised or discontinued at any time and for any reason. Any material changes to this CSR Policy shall be approved by the Board of Directors.

Reviewed and approved by the Board of Directors of the Company: July 30, 2019