

MGM Resorts International

Summary of Amendments to The Code of Business Conduct and Ethics and Conflict of Interest Policy

On August 20, 2019, MGM Resorts International (the “*Company*”) adopted certain technical, administrative, and other amendments to its Code of Business Conduct and Ethics and Conflict of Interest Policy (“*Code of Conduct*”). These amendments, among other things: (i) extensively revised language, layout, and style to enhance the readability and clarity of the Code of Conduct, as well as added “Required Learning”, “Spotlight”, and “Q&A” sections for employee reference; (ii) added reference to the Company’s Workplace Violence Policy and Workplace Safety Policy; (iii) reiterated the Company’s commitment to Corporate Social Responsibility, and leading a world without human trafficking; (iv) clarified the Company’s statement and Policy on anti-human trafficking; (v) added reference to the Company’s Responsible Gaming Policy, Employee Gaming Policy, and GameSense; and (vi) other minor clerical and formatting changes.

This description of the amendments to the Code of Conduct does not purport to be complete and is qualified in its entirety by reference to the full text of the Code of Conduct, as amended, which is posted at www.mgmresorts.com/codeofconduct.