



Code of Conduct

One of the guiding philosophies of our business culture (our ISMs) is “Do the Right Thing.” In furtherance of that core principle, this Code of Conduct (the “Code”) sets forth the high standards of ethical conduct and integrity that apply to all of the Company’s team members, including its executives, team leaders and other team members (collectively, “team member(s)”), in carrying out their respective job responsibilities. All new team members must acknowledge that they have received a copy of the Code and agree to comply with its provisions by signing an acknowledgement. All team members will be required to make similar acknowledgements on a periodic basis. Failure to read the Code or sign the acknowledgement form does not excuse a team member from compliance with the Code.

What are the Company’s Expectations for All Team Members?

As part of our commitment to “Do the Right Thing,” each of us is responsible for understanding and complying with the Code, the law and Company policy at all times. As a team member, you should act with integrity, use good judgment and avoid even the appearance of improper behavior. If in doubt about a course of conduct, ask yourself:

- Is it consistent with the Code and Company policy?
- Is it ethical?
- Is it legal?
- Would I want to read about it in the newspaper?

If the answer is “No” to any of these questions, don’t do it. If you are still uncertain, ask for guidance. The Code tries to capture many of the situations that team members will encounter, but cannot address every circumstance. You can always seek guidance from any of the following:

- Your team leader
- The Company’s Human Resources team
- The Company’s Compliance team
- The Company’s Finance team
- The Company’s Legal team

What are the Company’s Expectations for Team Leaders?

As a team leader, you should model appropriate conduct, ensure your team members understand their responsibilities under the Code and other Company policies, and create an environment where team members feel comfortable raising concerns without fear of retaliation. You should never encourage others to achieve business results at the expense of ethical conduct or compliance with the Code or the law.



If a team member approaches you with a question or concern related to the Code:

- Listen carefully and give your complete attention.
- Ask for clarification and additional information.
- Answer any questions that you can, but seek help if needed before providing a response.

If a team member raises a concern that may require investigation under the Code, contact your Compliance, Legal, Finance or Human Resources leadership.

Raising and Addressing Concerns

If you observe behavior that may be a violation of the law, the Code or Company policies, raise the issue promptly. Doing so will allow the Company an opportunity to immediately address the issue. You may contact any of the following to raise your concerns or ask any questions you might have about the Code:

- Your team leader
- The Company's Human Resources team
- The Company's Compliance team
- The Company's Legal team

If you are uncomfortable raising your concerns to a team leader or the above resources, you can report suspected violations of the Code or Company policy or any type of illegal, unethical or unsafe behavior at work by calling the **Ethics Hotline at 1-844-591-0568** or by visiting **www.jackentertainment.ethicspoint.com**. The Ethics Hotline is available to you 24 hours a day, 7 days a week, and you may use it to report your concerns anonymously.

The Company investigates possible violations of the law, this Code and Company policies, as well as any other behavior that could harm the Company's reputation and business interests. The Company investigates these matters as promptly and confidentially as possible, determines whether a violation has occurred, and takes appropriate corrective action. You are expected to cooperate fully with such investigations and answer all questions completely and honestly.

No Retaliation

Any retaliation against a team member who in good faith raises a concern about a suspected violation of the law, Code or Company policies will not be tolerated.

If you work with someone who has raised such a concern, you should continue to treat that person with courtesy and respect. If you believe someone has retaliated against you or



another team member, report the matter promptly to your Compliance Officer or the Corporate Legal or Compliance teams. If you are uncomfortable doing so, you may call the **Ethics Hotline at 1-844-591-0568** to report your concerns.

You should use your reporting rights responsibly, without intending to harass others or report trivial matters. It is a violation of the Code and Company policy to knowingly or willfully make false or misleading accusations. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you provide is accurate.

Equal Employment Opportunity / No Discrimination

The Company is committed to providing equal employment opportunities to all team members and applicants for employment and complying with all applicable laws that prohibit workplace discrimination and unlawful retaliation. The Company strictly prohibits any discrimination on the basis of race, color, religion, national origin, sex (including pregnancy, childbirth, breastfeeding or related medical condition), sexual orientation, gender identity or expression, age, disability, genetic information, marital or familial status, weight, height, military service or veteran status, or any other category protected by applicable law. This commitment and prohibition of unlawful discrimination and retaliation extends not only to team members of the Company, but also to independent contractors, trainees or participants in any program to provide unpaid experience in the workplace, and applies to all terms and conditions of employment, including advertising, recruiting, hiring, training, placement, transfer, work assignments, evaluation, compensation, benefits, leaves of absence, coaching, promotion, termination, layoff and recall. Every team member and team leader must follow and adhere to this Policy.

No Harassment

The Company is committed to maintaining a positive work environment free of harassment and intimidation where all team members are treated with dignity and respect. Any unwelcome conduct based upon a person's legally protected status, which unreasonably interferes with a team member's work performance or creates an intimidating, hostile or offensive work environment will not be tolerated.

The Company will promptly and thoroughly investigate all reports of discrimination and harassment, preserve the confidentiality of the investigation to the greatest possible extent, and take immediate and appropriate remedial action if warranted.



Company Assets

Company assets should be protected and used responsibly and in the manner intended. The Company's assets include everything from physical assets (such as Company money, product, vehicles or equipment) to intellectual property assets (such as our patents, trademarks or trade secrets) and everything in between (such as team members' time at work and work product).

You are personally responsible for properly using and caring for the Company assets entrusted to you and preventing their loss or misappropriation. You should refrain from using Company assets for your own personal benefit or the benefit of anyone other than the Company. When using Company assets, use common sense and comply with all Company policies. For example:

- Do not engage in personal activities during work hours that may interfere with or prevent you from fulfilling your job responsibilities.
- Do not engage in excessive personal use of your Company phone, computer or e-mail account in violation of the Acceptable Use Policy.
- Do not use Company systems or equipment for outside business, or to access or distribute obscene or offensive media or otherwise violate the Company's policies or applicable law, including copyright, trade secret, patent or other similar intellectual property laws.
- Do not take for yourself any opportunity for financial gain that you learn about because of your position at the Company, or through the use of Company property or information, without prior approval from the Company's General Counsel.

Business and Financial Records

Accurate recordkeeping and reporting reflects on the Company's reputation and credibility and allows the Company to meet its legal and regulatory obligations. Ensure that all Company business and financial records that you either create or are aware of based on your job duties are accurate, complete and conform to applicable legal and regulatory requirements, accounting principles, and the Company's internal control standards. Keep the following in mind when creating business or financial records on behalf of the Company:

- Never falsify a document; and
- Never distort the true nature of any transaction.

Always cooperate fully with our internal and external auditors and any regulatory authorities and provide them with full, fair, accurate, timely and understandable information and reports. You may report any concerns about financial, accounting and auditing matters, as well as any issues related to Company records, through the appropriate Company channels described in



this Code.

You should create, retain and discard Company records and information in a careful manner in accordance with the Company's Records Retention Policy and any applicable Company or team-specific policies, procedures and schedules. Comply with the Legal team's instruction when records should be preserved for potential or pending litigation or investigations or in response to court orders. Failure to abide by such instruction could expose the Company and/or team members to serious legal and financial consequences.

Confidential Information

You should safeguard and maintain the confidentiality of any non-public information entrusted to you as a team member that might be of use to competitors, or harmful to the Company or its guests, suppliers or business partners, if disclosed, except when disclosure is authorized or legally required. Hold the personal information of current and former Company team members and their beneficiaries in strict confidence. Your obligation to protect such non-public information extends outside of the workplace and working hours, and continues even after your employment with the Company ends.

The Company respects the privacy of its team members, guests and business partners and handles all personal data responsibly and in compliance with all applicable laws. Team members who handle the personal data of others must:

- Comply with applicable laws and any relevant contractual obligations;
- Collect and use such information only for legitimate business purposes;
- Limit access only to those with a legitimate business purpose for such information; and
- Take care to prevent any unauthorized disclosures.

Inquiries from the Media and Others

You may not answer questions on behalf of the Company from the media, analysts, investors or other members of the public, without authorization. Only team members delegated such authority within the scope of their job duties may speak to such third parties on the Company's behalf. Any such requests for information must be directed to the Company's Vice President of Communications.

Notification of Arrest or Legal Proceedings

You must immediately notify your Compliance Officer and the Company's Legal team if you are arrested, charged with a crime, plead guilty to a crime, or are issued a criminal complaint or other legal process in connection with your potential criminal violation of federal or state



law. Failure to do so may result in improvement action under the Coaching Policy up to and including termination.

Team Member Gaming

The Company has adopted a Team Member Gaming Policy to ensure compliance with applicable gaming laws, rules and regulations, and maintain consistent customer service standards at all of the Company's gaming properties. You should refer to the Team Member Gaming Policy for an explanation of what you can and cannot do with respect to gaming. Failure to act in accordance with this Policy may result in improvement action under the Coaching Policy up to and including termination, loss of licensure and/or criminal penalties.

Improper Payments, Gifts or Political Contributions Are Prohibited

Company funds and property must be used for legal, ethical and otherwise proper purposes only. Never seek to influence public officials, other companies or private citizens through the payment of bribes, kickbacks or any other unethical payment or gift. Such activity calls the Company's integrity into question and, in most cases, violates the law.

You must be particularly careful when dealing with public officials as such transactions are covered by special legal rules that carry severe sanctions, including monetary fines and imprisonment, if violated. Always obtain prior approval from the Company's Chief Compliance Officer and General Counsel before providing anything of value to a public service agent, and ensure that any such payments are properly recorded in the appropriate Company account. Consult with the Company's Legal team for clarification and guidance.

Although this Code generally does not prohibit you from personally supporting or contributing to political candidates or parties in accordance with applicable laws, certain jurisdictions, including but not limited to Michigan, prohibit the Company and its team members from making certain political contributions. Failure to follow these requirements may result in criminal penalties, loss of the team member's and/or Company's gaming licenses, and termination of employment. Any questions about political activity or contributions should be directed to the Company's Chief Compliance Officer and/or General Counsel to be evaluated on a case-by-case basis.

Insider Trading

You must keep inside information regarding the Company, its guests, suppliers, competitors or others, obtained through your position at the Company, confidential. Inside information is material, non-public information that a reasonable investor would consider important in a decision to buy, hold or sell securities. Do not use such inside information to trade in securities or engage in any other action to take advantage of, or pass along to others, that inside



information. Use of inside information for personal gain by yourself or your family members could result in jail time, fines or both. You should avoid even the appearance of improper transactions to preserve the Company's reputation for adhering to the highest standards of conduct. Consult with the Company's Legal team if in doubt about whether you possess inside information.

Conflicts of Interest

When acting on behalf of the Company, you must put the Company's interests ahead of your own personal gain. Do not allow your own interest or your family or other relationships to influence the decisions you make on behalf of the Company. Because the Company is committed to the highest ethical standards and desires to avoid even the appearance of impropriety, you should avoid even the appearance of such conflicts of interest. This may require you to withdraw from certain business decisions, including those related to the selection of vendors or decisions relating to the employment of others, such as recruitment, promotion, salary or allocation of duties.

You must report and disclose all transactions, interests and relationships involving employment, compensation, credit or loans, beneficial interest in or rights to profits or income that may give rise to an actual or apparent conflict of interest. Such disclosure obligation includes any interest or relationship with any entities that supply or purchase products or services to or from us or compete with us (other than ownership of less than 2% of the publicly traded securities of such a company).

Do not allow your business decisions to be influenced by gifts, favors or hospitality from others. Accepting or offering gifts, favors or entertainment can create a conflict of interest, result in the appearance of a conflict and, in some cases, violate the law. As a general rule, team members should not accept gifts from persons or entities that deal with the Company if the gift might reasonably be perceived to influence the team member's decisions or actions as a team member. You are responsible to know and comply with all applicable Company or team-specific policies or procedures related to accepting gifts or favors. Gifts that exceed the limitations in the Acceptance of Gifts Policy must be approved in writing by the Company's General Counsel.

Responsible Gaming

The Company is committed to promoting responsible gaming and ensuring that all of our guests are gambling for the right reason – to simply have fun. The Company only wants individuals who gamble responsibly to play in its casino. The Company promotes education and awareness on responsible gaming by publishing information on available resources, educating its team members, advertising responsibly, and funding responsible gaming research.



The Company helps fund and support a 24-Hour Problem Gambling Helpline to assist those seeking information and help on problem and compulsive gambling. This helpline number is listed on all of the Company's gambling and promotional materials as well as its responsible gaming posters and brochures. It is also posted at all of the casino's entrances and exits and at other locations in the casino. Publishing and promoting the helpline number is the most effective way for the Company to connect those who need help with the available local resources.

The Company also provides self-limit opportunities for guests to request in writing at the Main Cage revocation of their privileges for specific services, such as rewards club/card, markers, check cashing, complimentarys and gambling promotions.

While team members are not in a position to identify compulsive gamblers, if a team member becomes concerned based on a guest's statements that the guest may not be gambling responsibly, the team member should report this concern to his or her team leader, who will report this concern to team senior leadership and/or the Vice President of Compliance.

Team members experiencing problem gambling issues in their personal lives may also get help through the Team Member Assistance Program (TMAP) 24 hours a day, 7 days a week by calling 1-877-622-4327 or visiting www.cignabehavioral.com (Web ID: JACK).

In compliance with applicable law, all team members are responsible for preventing anyone under the age of twenty-one (21) from gambling or loitering in a gaming area in the casino. Team members who suspect a guest is not old enough to gamble should request to check the guest's ID or notify a team leader or Security officer immediately.