

**Resorts World Code of Ethics and Business Conduct**  
**2024**



# Resorts World Code of Ethics and Business Conduct

## Overview

This Code of Ethics and Business Conduct, which includes our Conflicts of Interest, Anti-Corruption and Anti-Bribery, and Ethics/Whistleblower policies (collectively, the “Code”) is applicable to Resorts World New York City, Resorts World Catskills, Resorts World Hudson Valley, Resorts World Omni, and Bimini Superfast Operations (collectively, the “Company”). The Code formalizes the Company’s commitment to conduct business in accordance with all applicable laws, rules and regulations, and ethical standards.

Every team member at the Company as well as agents, consultants, representatives, distributors, contractors, suppliers, and other person(s) associated with the Company (collectively, “Business Partners”) are expected to adhere to those principles and procedures in the Code that apply to them.

The Company has established standards for behavior that affects the Company; and all team members should comply with those standards. The Company promotes ethical behavior and encourages team members to talk to supervisors, managers, or other appropriate personnel when in doubt about the best course of action in a particular situation. If you are aware of a situation that you believe may violate or lead to a violation of any Company policy, please follow the guidelines below.

It is not possible to define the proper conduct and ethical behavior for every situation that may arise. However, the Company believes in honesty and integrity, at all times, in all transactions. Specific policies concerning certain aspects of ethical business conduct are discussed in the Code but are not in any way meant to be a complete code of business conduct and ethics.

**\*\*Any example listed in the Code is for illustrative purposes only. The existence of an actual or potential conflict of interest or other violation of the Code depends on specific facts. \*\***

The Code includes standards that are designed to deter wrongdoing and to promote:

- 1) Honest and ethical conduct, including the ethical handling of interest between personal and professional relationships;

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- 2) Full, fair, accurate, timely, and understandable disclosure in reports and documents the Company files with, or submits to, any regulatory body;
- 3) Compliance with applicable governmental laws, rules, and regulations;
- 4) The prompt internal reporting of violations of the Code to an appropriate person, hotline, or persons identified in the Code; and
- 5) Accountability for adherence to the Code.

### **Honest and Ethical Conduct Expectations**

Dishonest or unethical conduct can permanently damage the Company's reputation and compromise the trust of the public and our team members. Compliance with all applicable laws and regulations forms the foundation of the Code and provides a roadmap for honest and ethical conduct.

For team members and business partners, compliance with the Code is not merely expected, it is mandatory.

The Company expects that all its members and business partners will:

- Lead by example, presenting their behavior as a model for others and foster a culture where honest and ethical conduct is valued;
- When appropriate, raise concerns and questions about ethical conduct and integrity and encourage team members to do the same;
- Act in good faith and promote honest and ethical behavior in the workplace; and
- Show proper use of and control over the Company's assets and resources.

The Company will take disciplinary or preventive action as it deems appropriate to address any violations of the Code brought to its attention.

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## **Ethics Committee**

The Ethics Committee will be composed of the Ethics Officers, the SVPs of Operations, and senior leadership from Human Resources and Compliance.

The Ethics Committee is ultimately responsible for the Code and has designated responsibility to the Ethics Officer for implementation and administration of the Code,

## **Ethics Officer(s)**

The General Counsel of each property covered by the Code is the Ethics Officer for that property.

## **Conflicts of Interest**

A conflict of interest occurs when an individual's personal interest conflicts with the interests of the Company; when a team member has an outside interest that affects or provides an incentive to affect the individual's conduct as a team member. Every team member must balance their own personal interests and the interests of the Company. Personal conflicts of interest are prohibited as a matter of Company policy. Determination of conflict of interest will be made in writing by the applicable Ethics Officer.

Team members may not use their position with the Company to obtain any improper personal benefit for themselves, their family members, or any other person(s).

The Code is in no way intended to prohibit doing business with vendors or service providers as long as one does not exploit their position with the Company to obtain preferential treatment.

Any financial or other personal consideration that has the potential or the appearance of compromising a team member's objectivity in meeting their duties or responsibilities as a team member constitutes a conflict of interest. Negotiations must be fair and in compliance with Company policy and must promote the best interests of the Company at all times. Team members and business partners have an obligation to report any conflict of interest or potential conflict of interest.

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### **Gifts or Favors**

Team members and business partners may not solicit money, entertainment, hospitality, gifts, or favors.

Non- Purchasing Department team members and business partners may accept gifts provided that:

- a) The value of such gift (and the collective value of all such gifts from the same individual or concern in the same calendar year) is de minimis (generally \$750 or less);
- b) Gifts involving entertainment or hospitality must be approved by the President of Genting Americas East, the applicable property's SVP of Operations, or the Ethics Officer; and
- c) All offers of gifts or favors beyond this policy must be immediately reported to the Ethics Officer.

Purchasing Department team members may accept gifts under the provisions above but **all** gifts to Purchasing team members must be reported to the applicable property's Ethics Officer, regardless of monetary value.

### **Compliance with Laws, Rules, and Regulations**

It is the Company's policy to comply with all applicable laws, rules, and regulations and it is the responsibility of team members and business partners to adhere to those laws, rules, and regulations. The Company expects team members and business partners to refrain from any illegal, dishonest, or unethical conduct.

The Company practices "**ZERO-TOLERANCE**" to acts of bribery and corruption, either directly or indirectly, by its team members or business partners.

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Failure to report such relationships, activities, interests, non-compliance with laws or regulations or violations of the Code will be grounds for disciplinary action, up to and including termination of employment.

### **Anti-Bribery and Anti-Corruption Policy**

The Foreign Corrupt Practices Act (“FCPA”) makes it a criminal offense for a United States company or agents acting on its behalf to pay anything of value (cash, cash equivalents, goods and services, consulting agreements, speaker fees, research agreements, travel, hospitality, meals, favors, entertainment, donations, gifts, or anything that confers a personal benefit) as a bribe to a foreign governments or officials in order to benefit the business needs of the United States company.

It is the Company’s policy that all team members and business partners comply with the ethical standards and applicable legal requirements of the FCPA and of each foreign country in which business is conducted.

The FCPA’s anti-bribery provisions also make it illegal for United States companies or agents representing them to make contributions to foreign political parties or candidates with the intent to influence their actions. It is illegal in the United States under these provisions, regardless of whether the donation is legal in the country where it is made.

Additionally, the Foreign Extortion Prevention Act (“FEPA”) criminalizes the demand side of international corruption by amending domestic bribery statute 18 U.S.C. § 201 to make it unlawful for a foreign government official “to corruptly demand, seek, receive, accept, or agree to receive or accept, directly or indirectly, anything of value” from United States persons or companies in exchange for allowing them to do business abroad. In addition, the Bahamas Prevention of Bribery Act criminalizes giving to or accepting a bribe from a government official.

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### **Violations Reporting**

Any violation or suspected violation of the Code by team members or business partners may be reported directly to the Ethics Officer. Violations may also be reported anonymously via the Ethics Hotline at 833-964-0232 (New York and Miami) or 1-844-444-6383 (Bimini). The hotline is provided and staffed by a third-party company and services are offered in English, Spanish, Creole, and Chinese. An investigation, as may be appropriate, shall follow the filing of a complaint.

The Ethics Officer or a designated representative shall conduct the investigation. The investigation may be informal but thorough, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a complaint.

The Ethics Officer or designated representative will review disclosures of any actual, potential, or apparent violation of the Code with at least one member of the Company's Ethics Committee.

All team members and business partners must cooperate fully in the review process by providing all information that the Ethics Officer deems necessary to conduct an effective review.

The Company recognizes the potentially serious impact of false accusations, and all team members and business partners are expected to act responsibly in reporting violations. Making a complaint in bad faith is a violation of the Code and may subject the accuser to disciplinary action, up to and including termination of employment.

Retaliation (attempting to cause harm to someone because they have filed a good-faith complaint) will not, under any circumstance, be tolerated by the Company.

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### **Implementation and Oversight of The Code**

The Code is designed to be complimentary with the Company's other policy statements and periodic updates and training may be provided regarding the contents and importance of the Code.

Upon becoming employed by or associated with the Company, each team member or business partner must sign a statement reflecting awareness and understanding of the Code and must report either the absence or presence of actual, potential, or apparent conflicts of interest.

All interests, relationships or participation in transactions disclosed by any team member or business partner in accordance with this policy shall be held in confidence unless the best interests of the Company dictate otherwise.