



ANTI-HUMAN TRAFFICKING AND ANTI-MODERN SLAVERY POLICY

I. Policy

Golden Entertainment, Inc., its affiliates, and subsidiaries (collectively referred to as the “Company,” “we,” “our” or “us”) are committed to a work environment that is free from human trafficking and slavery, which for the purposes of this policy, also includes forced labor and unlawful child labor. The company does not condone human trafficking or slavery and our organization provides training to identify and respond to unlawful activity.

Trafficking is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a sexual exploitation, unlawful child labor, and/or forced labor or services through the use of force, fraud, or coercion for the purposes of subjection to involuntary servitude, debt or slavery. The Company’s team members, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others, through whom we conduct business, must avoid complicity in any practice that constitutes trafficking in persons or slavery. This commitment is aligned with our Company’s core values and embodied in our Code of Business Conduct and Ethics and is in compliance with the applicable laws and regulations.

II. Policy of Prohibiting Trafficking in Persons

Company policy prohibits trafficking in persons and slavery. Government contractors and their employees, subcontractors, subcontractor employees, suppliers and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring of illegal commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of team members or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the team member or applicant, basic information; or making material misrepresentations during the recruitment of team members regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, any significant cost to be charged to the team member or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.

III. Scope and Application

This policy applies to the Company's team members, officers, directors, temporary employees, or any third party engaged to provide services to the Company. Every team member is responsible for reading, understanding and complying with this policy. The Company's managers are responsible for ensuring that team members comply with this policy and complete any certification or training required of them. Our team members complete human trafficking training through the Company's learning management system, with the scope and frequency of training based on the team members' job duties, including team members responsible for supply chain management.

IV. Supply Chain

The Company provides its suppliers with a copy of the Golden Entertainment Supplier Code of Conduct and it is the Company's expectation that the suppliers be in compliance with applicable legal standards, including those required of the gaming industry, and prohibit human trafficking, slavery, or other unlawful behavior and practices. We reserve the right to require the suppliers to demonstrate compliance with applicable laws and regulations.

V. Reporting Requirements

Team members who become aware of any potential instances of violation of this policy have an obligation to report such events to Legal, Human Resources or Security Departments. Team members may also call the Company's independent anonymous 24/7 ethics and compliance hotline at (844) 597-9877 or submit a claim online at www.goldenent.ethicspoint.com, which allows anonymous reporting as permitted by applicable law. Team members who fail to report actual or suspected misconduct may be deemed in violation of this policy.

We investigate and respond to reported incidents that may violate this policy. Any violation of this policy may be grounds for team members' disciplinary action, up to and including termination. The Company has the exclusive right to interpret this policy regarding their respective employees. Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

VI. Non-Retaliation

We will not tolerate retaliation or threats of retaliation against a team member for reporting a concern under this policy in good faith or for cooperating with a compliance investigation.