

## WYNN RESORTS, LIMITED

# Political Contributions Policy and Procedures

Wynn Resorts, Limited (“We” “Us” or “Our”) has business interests in various states, in the Macau Special Administrative Region, and other international jurisdictions. The decisions of foreign, federal, state, and local governments affect us on a daily basis. Proposals to change existing laws or enact new laws and policy initiatives can impact our business, our employees, our communities, and our stockholders.

We take earnestly our role as a good corporate citizen, placing highest priority on full compliance with all local, state, and federal requirements associated with participating in the policy-making and political processes.

Pursuant to our Code of Business Conduct and Ethics, we strictly forbid giving or promising anything of value to a government official or government agent to avoid even the appearance of influencing that person in his or her official duties or encouraging unlawful conduct.

### Process and Oversight

Political contributions (including direct or indirect payments of corporate funds to any political party, candidate or campaign, contributions by our political action committee funded by employee donations, contributions to social welfare and political organizations, and trade association dues) may be made only if permitted under applicable law.

We consider political contributions to support candidates who understand the challenges of operating integrated resorts. Contributions are made solely to advance our business interests and the gaming and hospitality industries, generally. The political preferences of board members, officers or employees are not considered in the review and approval process.

We conduct extensive and ongoing research when identifying quality candidates to support for public office. Our government affairs team meets regularly with individual candidates to determine their familiarity with and stance on relevant issues of importance to us.

Our Code of Business Conduct and Ethics provides that political contributions (either directly or through our political action committee) may only be made with the review and approval of our Global Chief Compliance Officer. Proposed political contributions are subject to an internal control process, designed to confirm compliance with all applicable laws, including contribution limits, and to confirm that all political contributions are to promote our business interests.

We regularly review our public policy positions to advance our various business interests.

We support:

- Policies that strengthen public education for young people and continuing education and training for the current workforce;
- Broad-based tax policies that ensure public service needs are met without negatively affecting economic development;
- Policies that encourage diversity and inclusion in the workplace;
- Economic development policies that expand economic opportunities for our employees to enhance their quality of life;
- Policies that help prevent discrimination and abuse – particularly within the workplace;
- Policies that ensure natural resources are protected for future generations, and policies that further reliable, affordable, renewable energy production;
- Policies that ensure domestic and international tourism is safe and accessible, including policies and public investment in preparedness, emergency response, and adequate support for law enforcement and other first responders;
- Legislation that empowers companies to enact policy and strategies that best promote responsible gaming to their patrons;
- Regulatory policies that safeguard the integrity of the casino gaming industry;
- The right of each state to legalize and regulate sports wagering as it deems appropriate.

### **U.S. Federal Elections**

We participate in U.S. federal elections through Wynn Resorts, Limited Initiative for Public Policy, our political action committee, ("PAC") as well as via direct and in-kind contributions to national political action committees whose interests align with our business interests. Our government affairs team oversees the administration of our PAC, including assigning a registered Custodian of Records and reporting to the Federal Election Commission on receipts and disbursements from the PAC. A three-member governing board (the "Committee") of employees is responsible for the administration of PAC funds. The Committee has final authority on contributions made to Federal candidates and national political action committees, subject to the approval of the Global Chief Compliance Officer.

### **U.S. State and Local Elections**

Races for non-federal offices are governed by state and local law, in addition to federal law. In making political contributions, Wynn Resorts' policy is to strictly adhere to, and diligently comply with, the laws of each applicable jurisdiction. Political contributions (including direct or indirect payments of corporate funds to any political party, candidate or campaign, contributions by PACs funded by employee donations, contributions to social welfare and political organizations, and trade association dues) may be made only if permitted under applicable law.

Our indirect subsidiary was awarded a gaming license in the Commonwealth of Massachusetts in November 2014. Massachusetts law prohibits any individuals or entities licensed (or required to be licensed) by the Massachusetts Gaming Commission from making political contributions (cash or in kind), direct and indirect, to candidates for public office in Massachusetts, their committees or other political committees (other than a ballot question committee) above certain thresholds. The foregoing restriction does not apply to contributions made to the federal account of a political party committee or to any other federal political committees. We strictly adhere to these prohibitions and our policies are designed to confirm compliance with these prohibitions.

### **Employee Political Contributions**

We encourage employees to participate actively in community, civic, and political affairs. We do not reimburse any employee who chooses to make political contributions. Certain eligible employees are permitted to make individual contributions to our PAC, but there are no contribution requirements as a condition of employment or any other job-related benefit.

### **Trade Associations**

From time to time, we pay annual membership dues to industry trade associations, including the American Gaming Association and the Nevada Resort Association, both of which represent gaming industry interests. The trade associations in which the Company participates may engage in lobbying activities with those decisions governed by those associations' respective bylaws. None of the membership dues paid to trade associations are used for contributions to any candidate or other political committee.