

**DELAWARE NORTH COMPANIES, INC.**  
**GLOBAL PARTNER BUSINESS CODE OF CONDUCT**

**Overview**

This Business Code of Conduct (“Code”) applies to partners, agents, service providers, suppliers, vendors, consultants, contractors and subcontractors (collectively, “Partners”) who act on behalf of or are in business arrangements with Delaware North Companies, Inc. (“Delaware North”). Delaware North’s Partners have a critical role in upholding Delaware North’s reputation for excellence with guests, team members, clients and other important or interested parties. Delaware North therefore seeks to do business only with those Partners that are (and have been) committed to responsible and ethical business practices and share Delaware North’s values of Lean Forward, Come Together, Stand Up, Do Right and Think Guest.

As a prerequisite to act on behalf of or with Delaware North, all Partners must agree to comply with the following requirements.

**Business Conduct and Ethics**

Delaware North has achieved its success through excellence in service and hospitality, and not through unfair or improper business practices. Delaware North expects the same from its Partners and requires them to act ethically and with integrity in all aspects of business and their specific business relationship with Delaware North.

Below is a non-exhaustive set of business practices that organizations must follow when acting as a Partner to Delaware North:

1. **Conflicts of Interest**: Partners must avoid conflicts of interest which can occur when a Partner's interests affect its business judgment and/or ability to work with Delaware North without bias or have the appearance of doing so. If a Partner identifies a conflict of interest or has a question about whether a conflict of interest may exist, the Partner should advise Delaware North promptly. Partners must also be honest and direct when answering questions from Delaware North about potential conflicts of interest.
2. **Gifts and Entertainment**: Partners must refrain from offering to Delaware North team members, guests or clients any gift and/or entertainment that is excessive, creates the appearance of impropriety, violates the law and/or has no legitimate business purpose.
3. **Recordkeeping**: Partners must keep accurate and complete records in all aspects of business and their specific business relationship with Delaware North, including without limitation financial records such as expense reports, accounts payable, invoices, and billing and account statements. Supporting documents for all Delaware North related transactions must be kept pursuant to applicable laws and made available for review by Delaware North on reasonable notice.
4. **Responsible Communications**: Partners must not speak for or on behalf of Delaware North unless authorized to do so.

### **Compliance with Laws**

Partners must also comply with and adhere to all laws, regulations, controls, rules and orders applicable to their business. Below is a non-exhaustive set of legal requirements organizations must follow when acting as a Partner to Delaware North:

1. **Anti-Bribery, Anti-Corruption and Anti-Money Laundering**: Partners must comply with these laws in the jurisdictions in which they conduct business and also refrain from paying, offering, accepting, promising or authorizing anything of value to/from any person or entity in exchange for improperly obtaining or retaining business or securing some other improper advantage or benefit.
2. **Data Privacy and Information Security**: Partners must abide by all applicable data privacy and information security laws and regulations. In addition, personal and otherwise confidential information provided by or on behalf of Delaware North should only be collected, used, accessed, processed, stored and disclosed as permitted by written agreement with Delaware North.
3. **Employment and Human Rights**: Partners must comply with all applicable employment and human rights laws and regulations, including without limitation those pertaining to:
  - i. Anti-discrimination,
  - ii. Anti-harassment,
  - iii. Anti-retaliation,
  - iv. Fair treatment, and
  - v. Wages, working hours and benefits.

In addition, Partners must agree to:

- i. Promote a workforce that fosters mutual respect and equal opportunity.

- ii. Refrain from using – either directly or indirectly through its own third parties – all forms of forced, bonded, indentured, involuntary, child or otherwise illegal labor, including without limitation all forms of human trafficking and/or modern slavery, and comply where applicable with Australia’s Modern Slavery Act 2018 (Cth) and the United Kingdom’s Modern Slavery Act 2015.
  - iii. Allow employees to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by applicable law or regulation.
- 4. **Environmental, Health and Safety Matters**: Partners must comply with all environmental, health and safety laws and regulations applicable to their business.
  - 5. **Food and Beverage**: Partners that supply food products, ingredients or beverages must ensure that their products, ingredients and beverages meet the highest quality and safety standards. All products, ingredients and beverages supplied to Delaware North must be safe for human consumption, pure, wholesome, unadulterated and in compliance with all safety requirements and specifications under applicable laws and regulations.
  - 6. **Gaming, Lodging and Restaurant Operations**: Partners must comply with all gaming, lodging and restaurant industry laws and regulations applicable to their business.
  - 7. **Trade and Fair Competition**: Partners must comply with all trade and fair competition laws, regulations and controls applicable to their business and refrain from anti-competitive behavior and unfair business practices (e.g., without limitation:

collusion, boycotts, price fixing, false and/or misleading statements about the Partner's or a competitor's products, services or business).

### **Compliance with this Code**

It is the responsibility of each Partner to ensure that its representatives understand and comply with this Code and to inform its Delaware North contact (or a member of Delaware North management) if the Partner knows, or has reason to believe, that a violation by it or its representatives may have occurred or may occur in the future.