



GAMING & LEISURE
PROPERTIES, INC

Statement on Environmental, Social and Corporate Governance Matters

Policy Statement

Gaming and Leisure Properties, Inc. (“GLP” or the “Company”) is a publicly traded, self-administered, self-managed real estate investment trust primarily engaged in the property business, which consists of owning, acquiring, developing, expanding, managing and leasing gaming and leisure properties and related facilities to tenants, primarily under triple-net leases whereby the Company’s tenants are responsible for business operations, maintenance, insurance, taxes, utilities and other property-related expenses. The oversight and control of all energy and water usage and consumption and operations-related sustainability strategies related thereto are the sole responsibility of our tenants.

While we have no control, insight or oversight over our tenants’ operational decisions, sustainability strategy or related initiatives, we recognize our own responsibility to be a responsible corporate citizen, landlord, employer, and community member. We believe that strong corporate governance, environmental awareness, and community stewardship are important drivers of shareholder value and economic growth. We are committed to fostering a corporate culture that encourages and seeks the betterment of the Company, its stakeholders, and the communities in which we operate and conduct business. The Company’s Code of Business Conduct, charters and policies are prepared with these commitments in mind in an effort to ensure a rigorous adherence to the highest standards and best practices. GLP expects its employees, partners, suppliers, and vendors to adhere to the standards outlined in this document regardless of geographic location. GLP’s Environmental, Social and Governance Policy (the “Policy”) formalizes the Company’s commitment to growth and advancement as an environmentally and socially conscious organization.

Policy Governance

Environmental, Social and Governance (“ESG”) opportunities, risks and strategy are managed by the Company’s management team with the Company’s ESG Steering Committee. The Company’s Nominating and Corporate Governance Committee oversees all Company matters relating to ESG, including oversight of the Company’s policies and strategies relating to human capital management, corporate culture, and diversity, equity and inclusion. This Policy will be reviewed on a periodic basis and updated to reflect modifications to the Company’s strategy, framework and/or its policies and to ensure compliance with all legal or regulatory requirements.

Environmental Sustainability Commitments

GLP is committed to continued growth as an environmentally conscious organization and a responsible steward of the environment. As a triple net REIT, we have limited control over the properties under our portfolio, but we are nevertheless committed to seeking out opportunities to partner with our industry-leading tenants to establish and enhance environmentally sustainable initiatives. GLP recognizes the risks that climate change presents to our stakeholders and the environment. We are committed to continued education to understand the risk that climate change may have on our business operations and, as a landlord, GLP is committed to seeking opportunities to mitigate those risks as one of many ways the Company executes its mission of creating long-term, sustainable shareholder value.

GLP's commitment to environmentally conscientious practices is evidenced by its continued protection of the environment with strict compliance with all applicable laws and regulations, including partnering with its tenants to ensure compliance. Moreover, GLP incorporates environmental considerations into our business practices through adoption of green lease provisions in several of its master leases and lease amendments. Further, as part of its routine diligence process, GLP generally requires the completion of a Phase I Environmental Site Assessment, as well as any follow-up studies or diligence deemed necessary, in potential real estate acquisitions.

At our corporate headquarters, we reduce our impact on climate change by implementing best practices designed to reduce our emissions, water use, releases, and waste generation. Further, we monitor and report on the impact our operations have on the environment by disclosing our completed annual assessments of our greenhouse gas (GHG) emissions at our corporate headquarters.

We endeavor to create environmental awareness by engaging with our tenants to promote awareness regarding sustainability. Through our Tenant Partnership Program, we have engaged in meaningful dialogue with our tenants on environmental sustainability practices, data compilation, as well as other important material topics. We continue to explore partnership opportunities with our tenants to align our environmental strategies and goals in an effort to provide stakeholders with reliable and transparent information and data. We also create environmental awareness by engaging GLP employees on environmental and energy efficiency best practices.

Social Commitments

As a company, GLP is committed to conducting business in line with several international standards, such as the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization (ILO) Core Conventions on Labor Standards, and the ILO Declaration on Fundamental Principles and Rights.

Responsible Gaming Policy

Although GLP does not operate the casino facilities in its portfolios, being in a heavily regulated industry, we understand and appreciate the importance of responsible gaming to GLP's business as well as the importance of it to our tenants and other stakeholders. We are in alignment with the American Gaming Association's Code of Conduct for Responsible Gaming and fully supportive of tenant's efforts to ensure a fair, safe and responsible gaming environment.

All GLP tenants regularly promote responsible gaming through employee training programs, customer awareness campaigns, self-exclusion and financial restriction programs, and written procedures for recognizing and managing these issues.

Code of Business Conduct and Ethics

Our employees are responsible for conducting the Company's business in a manner that demonstrates a commitment to the highest standards of integrity. Our Code of Business Conduct (the “Code”) clearly sets forth the Company’s high standard for ethical and behavioral conduct in areas that include workplace health, safety and environment, human rights, harassment and discrimination, conflicts of interest, gifts and entertainment, proper use of company assets, delegation of authority, confidential information management, bribery and corruption, political contribution, and violation reporting protocols. The purpose of the Code is to clearly set forth areas of unethical risk, provide clear instructions to employees on how to report suspected unethical behavior, to foster a culture of inclusivity, honesty and accountability and to ensure protection against retaliation for employees who engage in conduct encouraged by the Code. All new employees of the Company are required to complete training on the Code at the time of hire. Employees and directors are required to complete annual online training on the Code on an annual basis. The Code is publicly available on our website at: <https://glpropinc.gcs-web.com/static-files/0e07821c-036e-45c8-96dd-0865131003a1>.

The Company expects employees to immediately report the violation to the Company’s General Counsel.

Vendor Code of Conduct

GLP believes that making a meaningful impact requires the participation of various stakeholders throughout the business. Our adoption of the [Vendor Code of Conduct](#) (the “Vendor Code”) sets the expectations for the vendors we engage and their subcontractors to comply with all applicable laws, regulatory requirements that govern their business, and GLP policies as they pertain to ethical business practices and integrity, fair working conditions, health and safety, respect for human rights and environmental stewardship. Vendors are also subjected to periodical reviews to ensure compliance with GLP’s Vendor Code. The Vendor Code is publicly available on our website at: <https://www.glpropinc.com/wp-content/uploads/Vendor-Code-of-Conduct.pdf>.

Human Rights and Inclusivity

GLP recognizes that our employees and vendors are our most valuable resource. We are committed to upholding fundamental human rights, human dignity, inclusivity and equal opportunity in the process of fostering a sense of community and well-being throughout our business. All employees and directors are required to complete training and refreshment regarding diversity and inclusion and non-discriminatory practices to prevent discrimination and promote an environment where our employees feel safe and free from offensive and/or harmful conduct. The Company’s Inclusive Workplace Policy formalizes its commitment to fostering an environment of inclusivity and is publicly available on our website at: <https://www.glpropinc.com/wp-content/uploads/Inclusive-Workplace-Policy.pdf>.

As a Company, we:

- Do not tolerate and discriminatory behavior or harassment based on gender, race, color, disability, ethnicity, nationality, religion, sexual orientation, veteran status, or any other status protected by law.
- Ensure equality in wages regardless of gender or age.
- Strive to create a workplace in which all employees are valued and respected by promoting an open feedback culture by which we regularly engage employees.
- Prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, any forms of slavery, and any form of human trafficking.
- Protect and uphold rights for women and minority groups.
- Recognize the rights to freedom of association and collective bargaining in accordance with ILO conventions [87](#) and [98](#).
- Recognize and uphold fair, safe, and equal working conditions, and abide by all applicable laws regarding minimum living wage, maximum working hours/overtime, and other elements of compensation and legally mandated benefits.
- Work to provide and maintain a safe, healthy, and productive workplace, by providing necessary security arrangements and addressing and remediating identified risks of occupational accidents, injuries, and adverse health impacts across our operations.
- Acknowledge the right to water as a fundamental human right.

Community Involvement

As a Company that seeks the betterment of the communities in which we operate or conduct business, it is of paramount importance that GLP operates as a good corporate citizen, is committed to taking an active role in supporting the communities in which we operate by partnering with local and national organizations to administer charitable contributions, provide community service and organize the donation of goods to assist local families in need. Moreover, we have developed Company policies specifically designed to provide our employees with paid time off to volunteer as well as a company match for monetary donations made to eligible charitable organizations. We are committed to identifying and consulting with community stakeholders to better understand and address high priority projects and concerns. All community engagement will abide by applicable laws and regulations where relevant. GLP is also committed to continuously collect, assess, and integrate stakeholder feedback when appropriate and possible.

Accountability Commitments

Oversight

Our Board of Directors has oversight and responsibility for these Policies through its Nominating and Corporate Governance Committee. The Committee shall periodically review and assess the appropriateness of the principles and policies herein and make recommendations to the Board, as appropriate.

Reporting and Disclosure

Employees and business partners are expected to report any violation of these policies to proper authorities, to senior management, and/or through GLP's third-party anonymous hotline at <http://www.reportlineweb.com/GLPI>. In addition, GLP is committed to regular reviews of our ESG Tearsheet and disclosing updates to our environmental, social and accountability commitments. GLP is also committed to welcoming stakeholder feedback regarding the implementation and effectiveness of these policies.

Approved Date: February 24, 2023