

## **GAMING AND LEISURE PROPERTIES, INC.**

### **Vendor Code of Conduct**

Gaming and Leisure Properties, Inc. (“GLP”) has adopted this Vendor Code of Conduct (this “Code”) to state our expectations for the vendors we engage as they relate to business integrity, fair working conditions, health and safety, respect for human rights and environmental stewardship. GLP expects its partners, suppliers and vendors to make all reasonable efforts to adhere to the standards outlined in this Code.

GLP’s environmental, social and governance approach is reflected in our commitment to be a responsible corporate citizen. We consider the impacts our activities have on all stakeholders. This commitment to responsible corporate citizenship extends to the integrity and practices of our vendors.

This Code is not intended to be an exhaustive list of all of the principles and policies we expect our vendors to follow. We expect our vendors and their subcontractors to comply with all applicable laws and regulatory requirements that govern their business activities and operations, whether or not specifically set forth in this Code. Any references in this Code to “laws” refers to all applicable laws, regulations, directives, rules, decrees, and governmental orders.

#### **Ethical Business Practices**

GLP is committed to conducting business ethically and responsibly. Vendors are expected to join GLP in our commitment to ethical business practices in conducting their business, and to refrain from engaging in or tolerating any unfair, improper or unethical business practices, including, but not limited to, bribery, corruption, conflicts of interest, extortion, fraud or misrepresentation. More specifically, we expect our vendors and their subcontractors to adhere to the applicable provisions of GLP’s [Code of Business Conduct](#), which dictates the conduct of our employees, officers, and directors (“associates”). These provisions are fully set forth in this Code.

#### *Anti-Bribery and Corruption*

Vendors shall not engage in any illegal or unethical relationships with GLP associates, including, but not limited to, providing gifts, kickbacks or anything of value to secure an unfair advantage through improper or illegal means. GLP vendors are strictly prohibited from undertaking any action that may unduly influence or induce a GLP associate to violate our [Code of Business Conduct](#), and any such behavior brought to our attention will not be tolerated. Vendors are expected to comply with all laws relating to anti-corruption, anti-bribery, anti-money laundering, facilitation payments, insider trading and the prevention of crime or any other financial crime in all areas where the vendor operates or provides products or services.

### *Conflicts of Interest*

We expect our vendors to avoid all conflicts of interest or situations giving the appearance of a conflict of interest with GLP and its associates. Vendors are expected to report any potential conflicts of interest and shall promptly report any proposed business relationship with any GLP associate that might create a conflict of interest with GLP or its subsidiaries.

### *Confidentiality of Information and Data Protection*

GLP requires all vendors to ensure the protection of confidential information and maintain that any such information not be accessed, disseminated, sold or otherwise disclosed to any third party except as explicitly authorized by GLP. We expect our vendors to adhere to all applicable laws and regulations relating to data security, privacy, and confidentiality.

### *Non-Retaliation*

Vendors and their employees shall be free to raise concerns of workplace safety, forced labor, ethical working conditions, corruption and bribery, or any other potential misconduct or violations without fear of retaliation in any form. GLP encourages our vendors to report any instances of suspected illegal or unethical behavior undertaken by GLP associates or affiliates, as well as any vendor providing products or services on behalf of GLP and/or our affiliates.

### **Human Capital Management**

GLP expects vendors to uphold the same values and standards that it requires of its associates. Our vendors and their subcontractors are encouraged to advance diversity, equity and inclusion in the workplace, promote the health and well-being of their employees, ensure safe working conditions and maintain a discrimination and harassment-free environment for their employees.

### *Fair Working Conditions and Wages*

GLP expects vendors to adhere to and maintain compliance with all applicable legal and regulatory requirements and to follow sound employee relations practices, including fair, safe and equal working conditions, rights to collective bargaining, minimum wages, overtime, and other elements of compensation and legally mandated benefits.

### *Child Labor*

GLP strictly prohibits the unlawful employment or exploitation of children in the workplace. Vendors and their subcontractors are expected to abide by the minimum employment age limit defined by applicable federal and state laws and regulations and in compliance with the International Labor Organization Standards.

### *Equal Employment Opportunity, Anti-Discrimination, Anti-Harassment and Anti-Discrimination Laws*

We are committed to maintaining a diverse and inclusive work environment in which all employees can feel comfortable and respected. We do not tolerate any form of discrimination or harassment and expect our vendors to meet the standards of all applicable laws regarding equal employment practices, anti-discrimination, anti-harassment and anti-retaliation laws.

### *Diversity, Equity and Inclusion*

GLP values diversity and expects its vendors to ensure that their workplace is free of harassment or discrimination based on race, ethnicity, religion, gender, sexual orientation, gender identity, age, disability, or other traits as protected by law. For our primary vendors who are domestic banking firms, law and accounting firms, and nationally established environmental and engineering and surveying firms, we encourage the adoption of diversity, equity and inclusion policies and practices demonstrating their commitment as done by GLP in our Inclusive Workplace Policy.

### *Health & Safety*

We expect our vendors to ensure the health and safety of their employees and to provide safe working conditions for their employees. Vendors are expected to comply with all applicable workplace conditions, safety and environmental laws, rules, regulations and standards.

### *Respect for Human Rights*

GLP upholds the free choice of all people and prohibits forced or compulsory labor. We expect our vendors to comply with the standards set forth in the United Nations Universal Declaration of Human Rights. Vendors should maintain and promote fundamental human rights and should not make use of forced labor, debt bondage, slavery, human trafficking, child labor and physically abusive disciplinary practices.

## **Environmental Stewardship**

GLP is committed to minimizing its environmental impacts and improving its efficient use of resources, which extends to the environmental impact of our value chain and to the actions of our vendors. Vendors are expected to carry out their operations with their environmental impact in mind and to comply with all applicable environmental laws and regulations.

## **Oversight and General Terms**

Our Board of Directors has oversight and responsibility for this Code 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.

Vendors and their subcontractors should report any suspected violations of this Code to GLP's General Counsel by email at [bmoore@glpropinc.com](mailto:bmoore@glpropinc.com). We encourage those with questions or concerns to contact our General Counsel regarding any of the requirements set forth in this Code. These provisions in this Code are meant to supplement the terms of any agreement between GLP (or GLP affiliate) and a vendor and are not meant to alter or amend the terms of any pre-existing agreements with any vendor.

Approved June 10, 2021