ANTI-BRIBERY, ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING POLICY

I. Policy Statement, Scope and Application

Golden Entertainment, LLC, its affiliates, and subsidiaries (collectively referred to as the "Company," "we," "our" or "us") is committed to maintaining the Anti-Corruption, Anti-Bribery and Anti-Money Laundering ("AML") Policy (the "Policy") in accordance with the Anti-Money Laundering and Suspicious Activity Compliance Program Version 7 and the Code of Business Conduct and Ethics. The Policy shall apply to all the Company's Gaming entities and each of its shareholders, officers, directors, employees, customers, vendors, affiliates, and agents ("Covered Persons"). It also applies to all of the Company's business operations and shall be adopted and enforced in all business activities conducted on behalf of the Company. All questions regarding the Policy should be directed to the Company's General Counsel (or designee) or by calling the independent anonymous 24/7 ethics and compliance hotline at (844) 597-9877. We are committed to maintaining a strong and effective corporate governance structure and our Board of Directors is responsible for reviewing our policies on an ongoing basis.

II. Prohibition of Corruption and Bribery

Anti-Corruption Policy

The Company is committed to doing business with integrity. This means establishing policies and procedures aimed at avoiding corruption and to comply with all applicable federal, state, and local laws and regulations (including the Foreign Corrupt Practices Act ("FCPA")). These laws prohibit bribery of foreign government officials (broadly defined later in this policy) with the FCPA mandating that companies establish and maintain accurate books and records as well as sufficient internal controls.

For the purposes of this policy, the term "government official" is broadly defined to include:

- Any officer or employee of any government entity, department, or agency, government-owned business, or other entity.
- Any political party, its candidate or official thereof, or a public international organization or any department or agency thereof.

Prohibition on Bribery

Applicable corruption laws prohibit companies and their employees and representatives from (directly or indirectly) giving, promising, offering or authorizing payment of anything of value to any government official in order to obtain or keep business or to secure some other improper advantage or influence a government official's actions and/ or decisions. This Policy does not prohibit legal political campaign contributions by the Company, as defined under the "Political Contributions" section below.

The prohibition on bribery applies to the giving of anything of value, not only money. This includes but is not

limited to providing business opportunities, favorable contracts, stock options, gifts, and entertainment. The Policy is further outlined in the Company's "Code of Business Conduct and Ethics," covering the treatment of facilitating payments, donations, services, gifts, meals and entertainment, and third-party payments.

In evaluating potential third parties and during any relationship with them, Company employees must be conscious of any "red flags" that may be present or arise. A "red flag" is a fact or circumstance that serves as a warning signal that a third party may act corruptly, including, but not limited to: rumors regarding unethical or suspicious conduct by an employee, consultant, or other business partner, or by a government official; unnecessary third-parties, multiple intermediaries or suggestions to use an intermediary; requests for payments to a second third party rather than the consultant or agent.

This Policy does not prohibit tip category team members from accepting unsolicited gratuities as outlined under "Accepting Gifts and Favors" in their "Team Member Handbook."

Political Contributions

Contributions to political parties or committees or to individual politicians may only be made with the prior written consent of the Company's President and Chief Financial Officer. Approved contributions must be made in accordance with applicable laws and comply with all requirements for public disclosure of such contributions.

III. Anti-Money Laundering Compliance Affirmation

The Company is committed to maintaining the policies and procedures for the following areas: financial compliance, gaming regulatory compliance, the advancement of responsible gaming, anti-money laundering, terrorist financing, corruption or other financial crimes as required under 31 CFR Chapter X (Title 31). The Company's designated Compliance Officer (or designee) ensures all aspects of its compliance programs.

The Company is committed to an ongoing review for enhancements to the AML program and to providing the tools and resources necessary to comply with the regulations and to maintain a strong culture of compliance. The objective of the Company is to fulfill these requirements with diligent team members, having "Know Your Customer" ("KYC") and "Customer Due Diligence" ("CDD") procedures, and ongoing effective training. The key elements of the AML program include:

- Having a designated Compliance Officer responsible for the management of an effective corporate AML program. In addition, the Company has established a Compliance Committee to meet and review/discuss compliance related matters on a quarterly basis, including data trends, AML bans, CTRs, SARs and KYC cases.
- Ensuring the Implemented System of Internal Controls is in compliance with all applicable AML requirements.
- Establishing a training program and instructing team members on Title 31 reporting requirements, including identifying suspicious activity and unusual financial transactions, recording currency transactions, as well as training on the updates to the AML legal requirements, policies and procedures on an annual basis.
- Utilizing an independent third-party AML compliance testing on an annual basis.
- Adopting appropriate risk-based procedures, such as KYC and CDD.