

MGM Growth Properties

Summary of Amendments to The Code of Business Conduct and Ethics and Conflict of Interest Policy

On August 24, 2017, MGM Growth Properties LLC (the “*Company*”) adopted certain technical, administrative and other amendments to its Code of Business Conduct and Ethics and Conflict of Interest Policy (“*Code of Conduct*”). These amendments, among other things: (i) clarified when political contributions may be prohibited; (ii) clarified that Third Party Sponsored Travel (“*TPST*”) is governed by the MGM Resorts International’s TPST Policy, and not the Conflict of Interest Policy; (iii) clarified the definition of Personally Identifiable Information (“*PII*”); (iv) clarified an employee’s obligation to notify appropriate gaming agencies, pursuant to the employee’s licensing conditions in the respective jurisdiction, in the event they are arrested, charged with a crime, or plead guilty to a crime; (v) clarified the definition of confidential information and the required treatment of confidential information; (vi) clarified the conduct expected of employees, as well as defined prohibited employee conduct; (vii) clarified the personnel who are authorized to speak to the media and others, including adding a reference to the MGM Resorts International’s Social Media Policy; (viii) reiterated the Company’s commitment to maintaining a workplace free from discrimination; (ix) provided clarification on the individuals and departments to which employees can report concerns involving potential discrimination, harassment or retaliation; (x) clarified all employees’ obligation to immediately report any potential harassment or retaliation that they have observed or have become aware of, in addition to all complaints or concerns brought to the employee’s attention; (xi) clarified the definition of working time, as it relates to the use company e-mail; and (xii) clarified the duty of employees to cooperate with audits and investigations into suspected violations of Company policies.

This description of the amendments to the Code of Conduct does not purport to be complete and is qualified in its entirety by reference to the full text of the Code of Conduct, as amended, which is posted at www.mmgrowthproperties.com/governance-documents.