

Excellence
with
Integrity



Table of Contents

| | |
|----|---|
| 4 | A MESSAGE FROM OUR CHAIR AND OUR CEO |
| 5 | A NOTE FROM OUR CHIEF GLOBAL COMPLIANCE OFFICER |
| 7 | OUR VALUES AND OUR CODE |
| 8 | SEEKING GUIDANCE AND REPORTING VIOLATIONS |
| | REPORTING WITHOUT RETALIATION |
| | CONFIDENTIAL INVESTIGATIONS |
| | CONSEQUENCES OF VIOLATIONS |
| 12 | INTEGRITY IN THE WORKPLACE |
| 12 | COMPLIANCE WITH LAWS |
| | ANTI-CORRUPTION LAWS |
| | TRADE LAWS |
| | GAMING LAWS |
| | PREVENTING MONEY-LAUNDERING |
| | PROHIBITION ON INSIDER TRADING |
| | DATA PRIVACY |
| 15 | TREATING EVERYONE WITH DIGNITY AND RESPECT |
| | PROMOTING A DIVERSE WORKFORCE AND PREVENTING DISCRIMINATION AND HARASSMENT |
| | ANTI-HUMAN TRAFFICKING |
| | MAINTAINING A SAFE AND RESPECTFUL WORKPLACE |
| | RESPONSIBLE GAMING |
| 17 | CONFLICTS OF INTEREST |
| | PERSONAL RELATIONSHIPS |
| | SOLICITATION, ACCEPTANCE, AND OFFERING OF GIFTS |
| | CORPORATE OPPORTUNITIES |

Table of Contents

| | |
|----|---|
| 20 | PROTECTION AND PROPER USE OF COMPANY ASSETS |
| | PROTECTION OF INTELLECTUAL PROPERTY |
| | ACCURATE RECORDS, RETENTION, AND DISCLOSURE |
| | PROTECTION OF CONFIDENTIAL INFORMATION |
| | WORKPLACE MONITORING AND EXPECTATION OF PRIVACY |
| 22 | INTEGRITY OUTSIDE OF THE WORKPLACE |
| | ENVIRONMENTAL RESPONSIBILITY |
| | COMMUNITY RESPONSIBILITY |
| | POLITICAL ENGAGEMENT |
| | FINANCIAL INTERESTS IN OTHER BUSINESSES |
| | EMPLOYMENT WITH OTHER BUSINESSES |
| | INTERACTING WITH GOVERNMENT AGENCIES |
| | COMMUNICATING WITH THE NEWS MEDIA AND VIA |
| | SOCIAL MEDIA |
| | NOTIFICATION OF ARRESTS OR LEGAL PROCEEDINGS |
| 26 | CONCLUSION |



A Message from our *Chair* and our *CEO*

“WE ARE COMMITTED TO BEING DEFINED NOT ONLY BY EXCELLENCE, BUT ALSO BY HONESTY, INTEGRITY, AND THE HIGHEST ETHICAL STANDARDS.”

Dear Colleague:



All of us at Wynn Resorts share a commitment to excellence in everything we do. We strive to be not just great, but to be the best. Being the best takes dedication and an unwillingness to cut corners in how we operate, because we understand that how we go about achieving our goals is as important as the very goal itself. In other words, there is the way everyone else does things, and then there is the Wynn way.

In striving to be the best, therefore, we are defined not just by our commitment to excellence, but also by our commitment to honesty, integrity, and the highest ethical standards.

This belief is reflected in our Code of Business Conduct and Ethics. The Code applies to each of us – to the members of our Board of Directors and Compliance Committee, to our executives and to each of our employees.

No code of conduct can address every possible situation you'll encounter or answer every question that arises. It is the guiding principles, expressed in our Code, that help us make decisions that are in the best interests of Wynn Resorts and that meet our ethical standards.

Please read this Code carefully so you understand both the details and the principles it presents. If you have questions, feel free to reach out to Omar Khoury, our Chief Global Compliance Officer, or any of our attorneys.

Thank you,



Philip G. Satre
CHAIR OF THE BOARD OF DIRECTORS



Craig Billings
CHIEF EXECUTIVE OFFICER



A Note from our *Chief Global Compliance Officer*

“WE MUST ALL BE COMMITTED TO DOING THE RIGHT THING, EVERY TIME, EVERY DAY.”

Dear Colleague:

As Wynn Resorts' Chief Global Compliance Officer, I am responsible for overseeing and monitoring compliance with our Code of Business Conduct and Ethics. The conduct of all of us should reflect the Company's values, demonstrate ethical leadership, and promote a work environment that upholds the Company's well-earned reputation for integrity, ethics, and trust. We must all be committed to doing the right thing, every time, every day.

If you suspect a violation of any applicable law or company policy, including this Code, you should immediately report that information via one of the reporting channels provided in this Code. And remember, we will not tolerate retaliation of any kind against anyone who in good faith raises a concern, reports possible misconduct, or assists with an investigation. If you believe you have been retaliated against, you should report it.

The Compliance Department can't do it alone. Each of us bears a responsibility for maintaining a strong culture of compliance within the organization. Together, we can continue to achieve excellence with integrity. Thank you for doing your part.



Omar Khoury
CHIEF GLOBAL COMPLIANCE OFFICER

Our Values and Our Code

Our success depends on our reputation for integrity and ethical business conduct. In everything we do, Wynn Resorts¹ is guided by four core values:

SERVICE DRIVEN
EXCELLENCE
ARTISTRY
PROGRESSIVE

Our Code reflects these core values and our core behaviors of caring about everyone, treating everyone with dignity and respect and taking personal responsibility for every detail. It provides a framework for ensuring ethics and integrity as we strive to live these values. We are all responsible for upholding the standards detailed in this Code.

This Code applies to officers, members of the Board of Directors (“members of the Board”), members of the Compliance Committee and employees as well as certain vendors, tenants, consultants, and joint venture partners (collectively with their employees, “business partners”) who work on our premises or on our behalf. Business partners subject to the Code will be informed of its requirements as applicable².

WE ARE ALL RESPONSIBLE FOR UPHOLDING THE STANDARDS
DETAILED IN THIS CODE.

¹Unless the context otherwise requires, references to the “Company,” “we,” “us,” or “our,” or similar terms refers to Wynn Resorts, Limited and its affiliates.

²Unless the context otherwise requires, references to “you,” or “yours,” or similar terms refers to officers, members of our Board of Directors and Compliance Committee, employees, and business partners.

About the Code

The Code provides a high-level overview of the core ethical values that govern how we do business. It is intended to be both a policy and practical guide to help you respond to issues and situations that may occur.³ We operate in a highly regulated industry, requiring the highest level of integrity, and we must all keep compliance and integrity in mind as we make decisions that affect our business. You must understand and comply with this Code.

We are committed to ensuring that you understand your responsibilities under the Code, and the additional policies that supplement this Code, through appropriate annual training. Most policies referenced in this Code are in the Employee Policy Guide located on the Company's intranet ("The Wire"). Certain policies, adopted by the Board of Directors, may be accessed at wynnresortslimited.gcs-web.com

³This Code is a statement of the fundamental principles that govern the conduct of the Company's business by its employees, officers, directors, and agents. It is not intended to and does not create any rights for any person.

Seeking Guidance and Reporting Concerns

We do not expect this Code to provide all of the answers to questions you may have about your obligations under this Code. If you have a question about the Code or your obligations you should ask the Chief Global Compliance Officer or the attorneys for your specific business unit (the “Legal Department”), and for questions about additional policies, you may also ask your supervisor or Employee Relations.

| | |
|---------------------------------|---|
| Chief Global Compliance Officer | Omar Khoury (702) 770-2571 / Omar.Khoury@wynnresorts.com |
| Wynn and Encore Las Vegas | Tom Reich, Senior Vice President, General Counsel (702) 770-7574 / Thomas.Reich@wynnlasvegas.com |
| Encore Boston Harbor | Jacqui Krum, Senior Vice President, General Counsel (857) 770-7574 / Jacqui.Krum@encorebostonharbor.com |
| Wynn Macau | Hernani Rouxinol, Vice President, Legal & Company Secretary (853) 8889-1306 / Hernani.Rouxinol@wynnpalace.com |
| Wynn Al Marjan | Jay Schall, Executive Vice President, General Counsel - International (853) 6207-4444 / Jay.Schall@wynnmacau.com |

You may also contact the Wynn Resorts General Counsel:

Ellen Whittemore, Executive Vice President and General Counsel
(702) 770-2113 / Ellen.Whittemore@wynnresorts.com

IF YOU HAVE A QUESTION, ASK IT. IF YOU HAVE A CONCERN WHETHER SOMETHING IS ETHICAL, RAISE IT. IF YOU BELIEVE SOMEONE HAS VIOLATED THE CODE, REPORT IT.

REPORTING WITHOUT RETALIATION

We encourage you to be involved in all of our efforts to act with integrity. If you witness or have a good faith belief that someone has violated the Code, any other policy, or the law, including accounting, auditing or securities laws, you should immediately report that information to any of the individuals listed above, Employee Relations, or via one of the following reporting channels:

EthicsPoint (844) 962-1319 / wynnresorts.ethicspoint.com

InTouch (Macau Only) (853) 6262-5201 / integrity@getintouch.com

When reporting a suspected violation, you do not have to disclose your name and we will do our best to maintain your anonymity. However, it is very difficult to investigate an anonymous complaint. We encourage you to provide your name to assist with an investigation of the report.

Executive officers and employees who are directors or above have a mandatory responsibility to report suspected unethical or illegal activities and violations of the Code.

We prohibit retaliation against you because you made a good faith report of a suspected violation or you cooperated in an investigation of a reported violation. Retaliation may take many forms, some overt—such as an undesirable shift change, some subtle—such as being ignored by your supervisor after making a report. We will not tolerate retaliation in any form. If you believe that you have been retaliated against for your role in making a report or participating in an investigation, you should report it as well.

Making a report in good faith doesn't mean that your suspicions have to be proven. It means that you have a reasonable basis to believe that a violation of the Code, any other policy, or the law has occurred or is about to occur. Additionally, you must provide truthful and accurate information any time you make a report and during an investigation. You may not file a report for your own personal reasons such as out of spite. A report made to harass or that intentionally includes false information is not a good faith report.

THE CODE IN PRACTICE

Q: I overheard a conversation in the employee dining room where an employee said they were going to ask a vendor for an iPad. It doesn't directly affect me. Should I report it?

A: Yes. We all have a responsibility to ensure that we operate with integrity. You will not be retaliated against for making a report in good faith.

Q. I was a witness to the statement that the employee was going to ask the vendor for the gift. The employee who said they were going to ask for the gift is friends with my supervisor. Ever since my supervisor found out that I participated in the investigation, I think he is treating me differently. He used to be pleasant to me, but now he glares at me and has threatened to change my schedule. What should I do?

A. Report the possible retaliatory behavior through one of the reporting mechanisms identified in this Code. We will investigate the claim, and if we find that your supervisor is retaliating against you, we will take appropriate corrective or disciplinary action, up to and including termination.

Q. I really despise my co-worker. She hasn't done anything that I think is a violation of the Code, but she is full of herself and I would like to make life miserable for her. May I file a report against her?

A. No. The Code and the reporting mechanism for reporting possible violations of the Code are meant to be used to identify real concerns. They are not to be used as part of a personal vendetta against someone you don't like.

CONFIDENTIAL INVESTIGATIONS AND CONSEQUENCES OF VIOLATIONS

When you make a report, we will promptly, fairly, and thoroughly investigate it to the extent possible based upon the information reported. We will do our best to protect and handle information disclosed to us in confidence and will share it only with those who have a need to know or to whom we are legally obligated to share. However, full confidentiality may not always be assured or guaranteed.

Violations of the Code, and our other policies can harm our reputation and expose us to potential civil and criminal liability. ***All substantiated violations of law, the Code, or our other policies will be taken seriously and may lead to proportional corrective or disciplinary action, up to and including termination, as is appropriate to the circumstances.*** In some cases, a violation may also result in a referral to the appropriate law enforcement or regulatory agency.

WAIVERS OF THE CODE

We rarely grant waivers of this Code. Waivers of the Code's requirements may be granted in specific circumstances by the Chief Global Compliance Officer or the Wynn Resorts General Counsel and must be reported to the Compliance Committee, an independent committee established by the Board of Directors to enhance the likelihood that we do not engage in activities that would negatively affect our integrity or reputation.

Waivers for an executive officer, member of the Board, or a member of the Compliance Committee may be granted only by the Board of Directors or by the Audit Committee in which case the waiver must be reported to the Board of Directors and otherwise disclosed as required by law.

Additional Policies: Related Person Transaction Policies and Procedures; Compliance Plan

Integrity in the Workplace

We strive to demonstrate ethical leadership, and promote a work environment that upholds the Company's reputation for integrity, ethical conduct and trust.

COMPLIANCE WITH LAWS

We are committed to operating in full compliance with all applicable laws.

We operate in more than one country and interact with many different cultures. You should always abide by the laws of the jurisdiction in which you are conducting business. If those laws or generally accepted business practices conflict with this Code, you must consult with the Chief Global Compliance Officer or the Legal Department.

To make sure that you understand the following restrictions, before engaging in development activities in a jurisdiction outside the United States, you must consult with the Chief Global Compliance Officer or Wynn Resorts General Counsel.

ANTI-CORRUPTION LAWS

We compete fairly and on the basis of our exceptional experience and portfolio.

We will not pay bribes or kickbacks to compete. Further, we must not violate the Foreign Corrupt Practices Act ("FCPA"). This U.S. law prohibits bribing a foreign government official for the corrupt purpose of obtaining or retaining a business advantage or to secure an improper advantage. Foreign government officials may also include employees or representatives of a company owned or controlled by a foreign government, members of a political party, or officials or employees of public international organizations (collectively "related individuals"). Violations of the FCPA can expose the individual involved as well as us to potential criminal liability.

In every jurisdiction in which we operate, the law prohibits us from making a corrupt payment such as a bribe or a kickback. Because corrupt payments can take various forms, including gifts, entertainment, transportation, travel, or even charitable donations, never offer, directly or indirectly, any form of gift, entertainment, or anything of value to any government official, or a related individual without the approval of the Chief Global Compliance Officer.

These restrictions also apply to anyone acting on behalf of the Company, including consultants, attorneys, and lobbyists.

Additional Policy: Anti-Corruption Policy

THE CODE IN PRACTICE

Q. We are bidding on a development in a foreign jurisdiction. The government official who is in charge of selecting the successful bidder is visiting Wynn Las Vegas next week to determine if we really are five-star. May I buy her lunch?

A. You must receive prior-approval from the Chief Global Compliance Officer to buy the government official lunch, which will only be given if the lunch is associated with legitimate business activities and is not intended to improperly influence the government official.

NEVER OFFER, DIRECTLY OR INDIRECTLY, ANY FORM OF GIFT, ENTERTAINMENT, OR ANYTHING OF VALUE TO ANY GOVERNMENT OFFICIAL WITHOUT ADVANCE WRITTEN APPROVAL.

TRADE LAWS

We comply with all laws that govern trade and we ensure that we comply with all trade sanctions programs in the jurisdictions in which we do business.

These trade laws prohibit or restrict doing business with companies in certain countries and with specific individuals. Failure to follow these restrictions can expose the individual involved as well as us to potential criminal liability. By requiring due diligence investigations on all potential partners as part of our overall compliance program, we ensure that we do not do business with any person identified on the United States Department of Treasury's Office of Foreign Assets Control ("OFAC") list, including with individuals identified as a threat to U.S. national security.

Additional Policy: Policy Regarding the Office of Foreign Assets Control Sanctions; Compliance Plan

GAMING LAWS

We operate in a regulated industry requiring the highest of ethical standards and a strict requirement for compliance with all applicable laws governing our gaming operations. We will always strive to maintain the trust and confidence afforded to us by our gaming regulatory agencies who have issued us licenses or concessions.

We will comply with all gaming laws in all jurisdictions in which we do business. To assist us with our responsibilities under these gaming laws, we have established a Compliance Committee composed of independent members and two members of the Board who serve as ex officio members. The Compliance Committee reports to the Board of Directors. Our Chief Global Compliance Officer reports to the Compliance Committee.

PREVENTING MONEY LAUNDERING

We will not knowingly allow our guests to engage in money-laundering activities in our operations and will take all necessary steps to combat such activities.

Money-laundering poses international and national security threats and is used to hide the proceeds of criminal and terrorist activities. We have assessed our risk for illicit activities and have implemented anti-money laundering (“AML”) policies that are designed and managed to combat money laundering by focusing on preventing, detecting, and reporting suspicious activities on our premises. Depending on your specific job responsibilities, you may be required to undergo regular training on the details of and comply with AML policies. Violations of AML laws may subject us and employees who facilitate the violation to civil and criminal liability.

Additional Policy: Anti-Money Laundering Compliance Policy

PROHIBITION ON INSIDER TRADING

We value the confidence that our shareholders have in us and their confidence that every person dealing in our securities has access to the same information.

You are prohibited by federal law from buying or selling securities of any company at a time when you are in possession of material, non-public information about that company. This is known as “insider trading” and is illegal. Communicating material, non-public information about a publicly traded company to someone else who may be interested in buying or selling that company’s securities – known as “tipping” – is also illegal. Information is “material” if: (a) there is a substantial likelihood that a reasonable investor would find the information “important” in determining whether to trade in a security; or (b) the information, if made public, likely would affect the market price of a company’s securities.

You are prohibited from engaging in insider trading or in tipping others with confidential, non-public information regarding our operations. Even the appearance of disclosing material, non-public information can harm us and result in serious legal consequences for us and for you.

Additional Policy: Trading Policy

DATA PRIVACY

We understand and respect our employees’, guests’ and users’ privacy interests. Maintaining the confidentiality and security of our customer data and other personal data is essential to maintaining the trust of our employees and guests.

We are transparent about the way we collect, use, store, share, access, secure, transfer, retain, and otherwise process personal information about our employees and guests. We provide notice to individuals to inform them as to how we collect and use their personal information. We take steps to ensure that our collection of personal information is fair and limited only to that which is needed to fulfill

our legal obligations and business purposes. We also obtain consent from individuals, in compliance with applicable law before we collect personal information.

You are responsible for ensuring the privacy, security and confidentiality of personal information entrusted to you.

Additional Policy: Enterprise Data Privacy Program

TREATING EVERYONE WITH DIGNITY AND RESPECT

We support, respect, and promote the fundamental human rights of our employees, guests and members of the communities in which we operate.

We follow fair labor practices in compliance with all applicable laws, promote diversity in workforce and equal opportunity employment, condemn human trafficking and guarantee workplace health and safety for all employees. We expect our business partners to uphold these same principles.

Additional Policy: Human Rights Statement and Policy

OUR COMPANY IS COMMITTED TO THE PROTECTION OF FUNDAMENTAL HUMAN RIGHTS FOR ALL PEOPLE, INCLUDING EMPLOYEES, GUESTS AND MEMBERS OF OUR COMMUNITIES.

PROMOTING A DIVERSE WORKFORCE AND PREVENTING DISCRIMINATION AND HARASSMENT

We are an equal opportunity employer and believe in and support equal opportunity in employment to all persons regardless of race, color, national origin, citizenship status, sex, pregnancy, marital status, gender identity or expression, sexual orientation or perceived sexual orientation, age, religion, veteran status, military status, disability, history of disability or perceived disability, genetic information or any other protected category.

We believe that all our employees are entitled to work in a safe environment where they are treated with dignity and respect. We do not tolerate offensive, demeaning, insulting or otherwise derogatory conduct, and we are committed to a workplace that is free from sexual harassment and harassment based on other legally protected characteristics, or any other basis protected by law.

We also believe that everyone has a role in creating a positive, safe, respectful work environment. You are required to follow and help enforce our preventing harassment and discrimination-related policies, and supervisors are required to advise the Employee Relations Department, the Chief Global Compliance Officer, the Legal Department, or through our reporting channels if you believe that any of those policies have been violated, even if the person who is the subject of harassment does not wish to pursue a complaint. Discrimination or harassment by anyone, including business partners or guests will not be tolerated.

While guest service is upheld to the highest standard in our operations, inappropriate behavior toward you by those guests is not tolerated. You will receive guidance and support in responding to disrespectful guest behavior, with reporting structures in place to ensure each situation is handled with an appropriate response that upholds our standards of conduct and workplace safety.

Additional Policies: Equal Opportunity Statement; Diversity, Inclusion and Equity Statement and Policy; Preventing Harassment and Discrimination Policy; Employee Interaction with Guests and Other Third Parties Policy

THE CODE IN PRACTICE

Q. I'm an IT employee who has to deal with a particular vendor employee on a weekly basis. He works for a vendor upon which we rely for some upgrades to our critical IT infrastructure. This guy always makes sexually suggestive comments even after I have asked him to stop. What should I do?

A. Report the comments to your supervisor, or if you are uncomfortable, to Employee Relations, the Chief Global Compliance Officer, the Legal Department or through the reporting channels. Any one of those will deal with the situation appropriately, including if necessary requiring the vendor to remove him from our project. You do not have to tolerate that conduct.

Q. I heard an employee telling another employee sexually explicit jokes. The employee who heard the explicit jokes thinks they are offensive but doesn't want the employee who told them to "get in trouble." Should I report it?

A. If you are a supervisor, you must report the unwelcome sexually explicit jokes. If you are not a supervisor, you don't have an obligation, but you should report the jokes so that the offending behavior may be stopped.

ANTI-HUMAN TRAFFICKING

We condemn all forms of human trafficking.

In addition to dedicating resources to those organizations which seek to eradicate human trafficking, we have adopted an anti-human trafficking policy that reflects our commitment to implementing and enforcing effective systems and controls to ensure human trafficking is not taking place in any part of our organization. We have developed awareness training and a virtual curriculum for our employees on human trafficking prevention and how to spot suspicious behaviors and identify the quickest and safest procedures for alerting appropriate security personnel. You must not knowingly allow or facilitate any form of human trafficking and you must report any signs of it.

Additional Policy: Anti-Human Trafficking Policy

MAINTAINING A SAFE AND RESPECTFUL WORKPLACE

We encourage a culture of respect for each other and for our guests and business partners. We are committed to maintaining a workplace free from violence, threats of violence, and other unsafe or disruptive behavior.

We will not tolerate verbal or written threats, stalking, harassing, or possession of a weapon or other hazardous device or material. Anyone engaging in such behavior will be immediately removed from our premises, and may also be referred to law enforcement.

Additional Policy: Workplace Violence Policy

RESPONSIBLE GAMING

Encouraging our guests to responsibly enjoy gambling is an integral part of our daily operations.

Our guests may always request at any time to be removed from any promotional mailings and for revocation of casino-specific privileges such as access to markers, player card privileges, and on-site cash transactions. We reserve the right to exclude a patron from gaming without a request from a patron. We provide current education to new employees on responsible gaming and provide periodic refresher training. We make information available to all patrons explaining the probabilities of winning or losing at the various games offered by our casinos.

We also publish accurate and consistent information as the foundation of building trust with our customers. Responsible marketing is part of the communication strategy across our business and is part of our commitment to responsible gaming. We advertise responsibly by including a responsible gaming message and a toll-free help line number in our advertising where practical. We place media where most of the audience is reasonably expected to be above the legal age to participate in gaming activity. We do not feature marketing designed to appeal to individuals under the age of 21.

You must familiarize yourself with our policies and know how to direct guests to resources addressing any concerns they may have.

Additional Policy: Responsible Gaming Policy

CONFLICTS OF INTEREST IN THE WORKPLACE

We make all of our business decisions based on objective criteria, and with truthfulness and honesty. Similarly, you must make decisions that affect us based on our best interests. A conflict of interest occurs when you make a decision for us that benefits you, your family, your friends, or your outside business interest at the expense of our best interests.

You must avoid conflicts of interest and circumstances that create the appearance of a conflict. Part of your obligation to avoid such conflicts is the disclosure of all actual, apparent, and potential conflicts. Many potential conflicts of interest may be avoided or resolved if you timely disclose them. If you aren't sure if a situation poses a conflict, you should ask the Chief Global Compliance Officer or Legal Department.⁴

PERSONAL RELATIONSHIPS

We believe in maintaining a professional work environment at all times free of situations which may affect your decision-making on our behalf.

Whether intentional or not, personal relationships may improperly influence your decisions at work. Romantic or intimate relationships between employees particularly create potential conflict issues, even if the relationship is voluntary and welcomed. These concerns are amplified in relationships between supervisors and subordinates where the potential for unequal treatment and favoritism is enhanced. Similarly, relationships between you and a business partner may pose a conflict, particularly if you have any ability to influence their relationship with us.

In order to ensure that your personal relationships with employees or business partners do not create a risk of influencing your decisions at work, you must report them as required by our Personal Relationships Policy. We may take steps to alleviate possible conflicts of interest.

Additional Policy: Personal Relationships Policy

SOLICITATION, ACCEPTANCE AND OFFERING OF GIFTS

Our decisions must be based on the best interest of our business. The giving or receiving of gifts should not influence our business decisions.

SOLICITATION OF A GIFT

You may never ask for a gift from an employee, guest, business partner or person wanting to become a business partner.

ACCEPTANCE OF A GIFT

You may not accept a gift or gifts collectively valued at more than \$500 USD in a calendar year from any employee, guest, business partner or person wanting to become a business partner, without approval by the Wynn Resorts General Counsel or Chief Global Compliance Officer. Any approval of an exception to the \$500 limit must be reported by the Chief Global Compliance Officer to the Compliance Committee on a quarterly basis.

⁴Special rules apply to conflicts of interest involving executive officers and members of the Board. Executive officers and members of the Board should consult with the Wynn Resorts General Counsel before engaging in any conduct that may involve a conflict with us.

You may accept tips and gratuities if you are a tip category employee so long as the tip is given to you within the course of your regular job responsibilities.

You should never accept a gift with any value if the potential for a conflict of interest or personal obligation is created. If your responsibilities include making purchasing decisions for us, you may not accept a gift from a business partner or a person wanting to become a business partner, no matter the value.

OFFERING GIFTS

You may not offer or give a gift in connection with our business that goes beyond the common courtesies associated with customary business practices. These restrictions do not apply to complimentary goods or services customarily provided to guests in the ordinary course of our business.

Our business partners likely have gift and entertainment policies of their own. You must not knowingly provide a gift or entertainment that violates the business partner's policies.

THE CODE IN PRACTICE

Q. I'm a marketing executive. A guest gave me a purse valued at \$1,000. May I keep it?

A. Probably not. You may not accept a gift valued at more than \$500 from a guest without the approval of the Chief Global Compliance Officer or Wynn Resorts General Counsel. If rejecting the gift would offend the guest, you may accept the gift with the understanding that you must report it to the Chief Global Compliance Officer. Depending on the circumstances of the gift, you may be required to donate it to the Wynn Resorts Foundation. Many times, expensive gifts are given with the implied understanding that next time, you'll "take care" of the guest with a complimentary they haven't earned.

CORPORATE OPPORTUNITIES

You have a duty to always act in our best interest and to advance our legitimate business interests. You must never take advantage of business opportunities that rightfully belong to us. Business or investment opportunities you learn from your position with us such as from a competitor or business partner is a business opportunity for us. You may not personally participate in the opportunity without the approval of the Chief Global Compliance Officer. Executive officers and members of the Board must obtain the approval of the Audit Committee of the Board of Directors. When in doubt about whether a specific opportunity should be brought to our attention, you should consult with the Wynn Resorts General Counsel.

PROTECTION AND PROPER USE OF COMPANY ASSETS

We each have a duty to protect our assets and promote their efficient use. You must use our assets, including the data we hold, time for which you are being compensated, equipment, materials, resources, and confidential, proprietary or trade secret information, for business purposes only.

PROTECTION OF INTELLECTUAL PROPERTY

Our intellectual property may not be used or reproduced without our consent and only for business use. Intellectual property includes our ideas, designs, copyrights, trademarks, logos, and brand names and any other work or invention that we have developed as the result of our creativity. We also respect the intellectual and trade secret information of others. You may not use anyone else's intellectual property without their permission. If you have any questions about the use or protection of our assets, including our intellectual property or someone else's intellectual property, please contact the Legal Department.

Additional Policy: Computer, Internet, Intranet, and Email Use Policy

ACCURATE RECORDS, RETENTION, AND DISCLOSURE

We have an obligation to be truthful and accurate in our record-keeping. We are required and intend to make full, fair, accurate, and timely disclosure of information in all government filings and submissions and in all other public communications made by us.

You must complete all business documents including records of our financial activities accurately, truthfully, in compliance with all laws and, as applicable, accounting practices. You must also follow all laws and our policies relating to the retention of documents, such as, by way of example only, gaming regulatory requirements for the retention of revenue records. We will determine whether to keep any records based on legal requirements and on a systemic and regular basis. You may never destroy records selectively or maintain those records off premises (except as may be authorized by your supervisor in order to work remotely).

You must notify the Legal Department if you receive a request for any of our documents in litigation or by a government agency. You must retain all records that may be responsive to the request until otherwise authorized by the Legal Department.

Additional Policy: Records & Information Management

PROTECTION OF CONFIDENTIAL INFORMATION

The information we possess is part of what makes us successful and it allows us to remain the preeminent operator of integrated casino resorts in a highly competitive environment.

You must maintain the confidentiality of information we entrust to you and must disclose it only as authorized or legally required and only to those who have a need to know the information for legitimate business or law enforcement purposes. The obligation to maintain the confidentiality of our information continues even after your relationship with us ends. Confidential information includes information about our employees, guests, applicants for employment, and business partners. This Code does not prohibit you from reporting possible violations of law to any government agency.

THE CODE IN PRACTICE

Q. I'm really proud of how well our restaurants do. May I boast to my friend how much we made at Delilah over a holiday weekend?

A. No. The amount of revenue we make at any of our venues is confidential and you may not disclose that information, even to a close friend whom you trust.

WORKPLACE MONITORING AND EXPECTATION OF PRIVACY

We conduct regular and routine video monitoring of our premises, including public and non-public areas, for your protection and that of our guests and our assets. You have no right to privacy in any public or non-public area, including any office or other space with restricted access. In addition, you have no right to privacy when using the Company's computers, email systems, or other storage or communication devices.

Additional Policy: Computer, Internet, Intranet, and Email Use Policy

THE CODE IN PRACTICE

Q. I keep some personal information on my work computer. Is that information private?

A. No. While limited personal use of our equipment is allowed for supervisors, all information stored or sent using your work computer is considered non-private. Make sure to consider that when deciding whether to save personal information on our computers, whether in a network folder, your personal drive or on the PC assigned to you.

Integrity Outside of the Workplace

ENVIRONMENTAL RESPONSIBILITY

As an internationally recognized brand, we understand our responsibility to address the complex environmental issues facing our entire industry.

Through the guiding principles of our global sustainability program, known as Goldleaf, we continuously accelerate our progress toward our goal of leaving the planet in better condition than we found it.

COMMUNITY RESPONSIBILITY

As champions of the destinations we serve, we invest heavily in enhancing the quality of life in our home communities. We have an extensive organization dedicated to providing opportunities for you to either volunteer or donate money to directly benefit the communities in which we do business.

If you wish to serve as a director, trustee, or similar role of a charitable, non-profit, for-profit, or other entity, you must have the permission of the Chief Global Compliance Officer. We require such permission to ensure that any possible conflicts are resolved and to ensure that you do not affiliate with an organization whose reputation may damage our own.

POLITICAL ENGAGEMENT

We take earnestly our role as a good corporate citizen, placing highest priority on full compliance with all local, state, and federal requirements associated with participating in the policy-making and political processes.

We consider political contributions to support candidates who understand the challenges of operating integrated resorts. Contributions are made solely to advance our business interests and the gaming and hospitality industries, generally. Proposed political contributions are subject to an internal control process, designed to confirm compliance with all applicable laws, including contribution limits, and to confirm that all political contributions are to promote our business interests. Political contributions (either directly or through our political action committee) may only be made with the review and approval of our Chief Global Compliance Officer.

We believe that if we want to see positive change in our communities, we must do it together and we encourage you to become informed and vote. However, you must never represent your personal views as ours. In addition, if you choose to engage in political activity, you must do so on your own time, outside of work and you must not use our resources, property, or other assets, including our email system for any political purpose unless specifically part of your position responsibilities or approved by the Chief Global Compliance Officer or Wynn Resorts General Counsel to communicate regarding candidates supported by us or our political action committee.

You must have the permission of the Chief Global Compliance Officer before seeking elective office or an appointment to a government-related position. We will not consider political affiliation in making a determination as to whether to approve the request. We require approval to ensure that any possible conflicts are resolved before you become a candidate or appointee.

Additional Policies: Political Contributions Policy and Procedures; Computer, Internet, Intranet, and Email Use Policy

FINANCIAL INTERESTS IN OTHER BUSINESSES

Neither you nor any member of your immediate family may own a significant interest in any business that is our competitor, except that you may own up to 2% of a publicly traded company that competes with us. A competitor is a company with gaming or sports betting operations in a jurisdiction in which we do business. Additionally, if your job responsibilities relate to restaurants or entertainment, you must disclose to the Chief Global Compliance Officer any interest in a restaurant or entertainment venue in the jurisdictions in which we do business for a determination if a conflict exists. In addition, you and your immediate family may not own a significant interest in any business that does business with us without prior written approval of the Chief Global Compliance Officer.

EMPLOYMENT WITH OTHER BUSINESSES

You and your immediate family members may not be employed by or serve as a director of our business partner without the permission of the Chief Global Compliance Officer. If you have been given access to our confidential information, you may not be employed by our competitor without the permission of the Chief Global Compliance Officer. If your family member is employed by a competitor and you have access to confidential information, you must discuss your particular circumstances with the Chief Global Compliance Officer or Legal Department so that they may assess security and confidentiality issues and protect against disclosure of such information. Your outside employment may further be limited by your employment agreement with us.

THE CODE IN PRACTICE

Q. I have been offered a part-time job with another business. May I accept it?

A. Probably, unless the business is our business partner or competitor and you possess our confidential information. If you are employed under an employment agreement, there may be additional restrictions on outside employment in that document. If you aren't sure if you may take the job, contact the Chief Global Compliance Officer or Legal Department.

Q. One of our vendors has invited me to join its advisory board. Does the Code allow me to do this?

A. Probably not. The potential for a conflict is too great. The Chief Global Compliance Officer may approve the position if able to protect us from the conflict, such as not allowing you to be involved in anything having to do with the vendor's arrangement with us.

INTERACTING WITH GOVERNMENT AGENCIES

We cooperate with governmental investigations.

Any contact with government authorities other than routine interactions, must be immediately reported to the Legal Department or the Chief Global Compliance Officer. Nothing in this Code prohibits anyone from making a report or cooperating in an investigation with any government agency, including but not limited to the following or equivalent agencies in jurisdictions outside the United States:

- EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (EEOC)
- NATIONAL LABOR RELATIONS BOARD (NLRB)
- OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)
- SECURITIES AND EXCHANGE COMMISSION (SEC)
- GAMING REGULATORY AGENCY

We never directly or indirectly make false or misleading statements, omit or cause anyone else to omit a material fact, or destroy or alter a document that has been requested in connection with an investigation or audit.

Additional Policy: Permitted Disclosures Policy

UNLESS YOU ARE AN OFFICIALLY DESIGNATED COMPANY SPOKESPERSON, YOU MAY NOT SPEAK WITH THE MEDIA, SECURITIES ANALYSTS, OTHER THIRD-PARTIES, OR ANY MEMBER OF THE PUBLIC AS OUR REPRESENTATIVE OR ABOUT OUR BUSINESS.

COMMUNICATING WITH THE NEWS MEDIA AND VIA SOCIAL MEDIA

Unless you are an officially designated spokesperson, you may not speak with the media, securities analysts, other third-parties, or any member of the public or on social media as our representative or about our business. In general, you should refer such inquiries to the Chief Communications Officer or Public Relations Department.

We respect your right to use social media as a medium of personal self-expression and conversation and we do not want to discourage such self-expression and discussion. We do not discriminate against employees who use social media to express their personal interests or for other lawful purposes. However, social media sites have nearly unlimited communication potential, duration and retention, and generally can be accessed by anyone around the world. To protect our legitimate business interests, you are prohibited from engaging in certain activities while using social media, such as, for example, harassing other employees or posting confidential information.

Additional Policy: Social Media Policy

THE CODE IN PRACTICE

Q. I like to post on social media. May I say that I am a Wynn employee?

A. Yes. You may refer to yourself as an employee but you must not post anything that implies you are speaking for us unless you are specifically authorized to do so. You must never engage in behavior that could damage our reputation.

NOTIFICATION OF ARRESTS OR LEGAL PROCEEDINGS

We must comply with applicable notification requirements from our gaming regulatory agencies that may require us to notify them of certain employee arrests and convictions. If you are arrested, charged with a crime, plead guilty or are otherwise convicted of a crime, or receive a subpoena to testify in any criminal proceeding, you must report that to your supervisor or Employee Relations. Depending on the circumstances of the arrest or conviction, applicable law, and your particular position or responsibilities, we may take corrective or disciplinary action against you.

In addition, you must inform Employee Relations of any civil complaint, administrative charge, or settlement involving a claim that you engaged in sexual harassment, even if it relates to previous employment.

Additional Policy: Personal Conduct Policy

THE CODE IN PRACTICE

Q. I was arrested and charged with a DUI over the weekend. Do I have to tell anyone?

A. Yes. If you are arrested or charged with a crime, you must report it to Employee Relations or to your supervisor who is then required to report it to Employee Relations. Depending on your job responsibilities and your position, we may have an obligation to notify the gaming regulatory agency in the jurisdiction in which you work and it may affect your employment with us.

Conclusion

Achieving excellence with integrity is not always easy. It requires hard work and a commitment by each of us. To be successful, we and you must:

- ACT IN ACCORDANCE WITH OUR VALUES
- COMPLY WITH THE LAWS AND REGULATIONS THAT APPLY TO OUR BUSINESS ACTIVITIES
- ADHERE TO OUR POLICIES, INCLUDING THIS CODE
- TREAT EACH OTHER, OUR GUESTS, AND OTHERS FAIRLY AND WITH KINDNESS AND RESPECT
- REPORT VIOLATIONS OF OUR POLICIES OR THE LAW