

SOCIAL MEDIA ENDORSEMENT POLICY

PURPOSE AND SCOPE

Live! Casino & Hotel ("LCH") is committed to transparency and honesty in all its advertising messages and promotional communications with consumers. One of the most common ways to advertise and market products and services in social media is to use third party endorsements. Like other types of advertising, endorsements must be truthful and not misleading. Consumers must understand when a social media endorsement is sponsored by us. This Policy applies to all agencies, independent contractors, speakers, writers, bloggers, talent, influencers, and any other individual or entity engaged in promotional communications on behalf of LCH on social media or other non-traditional media.

DEFINING A "SPONSORED ENDORSER" COVERED BY THIS POLICY

An individual or entity communicating on social media or other non-traditional media is covered by this Policy if its promotional messages about LCH or our offerings are sponsored by us ("**Sponsored Endorser**"). If the individual or entity is acting independently, it is not subject to this Policy. A message is sponsored by us if we have a material connection with the individual or entity. A material connection is a tie to us which if known to consumers might make consumers question the credibility of the endorser or materially affect the weight consumers place on the endorsement. It puts the endorser's independence in question. For example, LCH creates a material connection if we do any of the following either directly or through an advertising agency, public relations firm, or other third party:

- Hire an agency to blog, post, or serve as a community manager on our behalf (both the agency and its employees then become Sponsored Endorsers).
- Enter into an agreement with an individual to blog or post.
- Pay an individual to blog or post.
- Provide free accommodations or travel to an individual for a company event or experience.
- Provide discounts, sweepstakes entries, or other incentives to an individual.
- Provide an individual with free prizes for giveaways or sweepstakes on social media platforms.
- Provide an individual with free samples to review on social media platforms.
- Provide an individual with free samples after that person has blogged or posted independently, especially if providing the free samples creates the expectation of additional free samples.
- Engage affiliate marketers to advertise, blog, endorse, or sell on our behalf (making the affiliates and their employees Sponsored Endorsers).

This list, though comprehensive, is not exhaustive. Check with Live! Casino & Hotel's legal department for any questions about whether Live! Casino & Hotel's actions have created or will create a material connection with a third party.

SPONSORED ENDORSERS MUST COMPLY WITH OUR STANDARDS OF CONDUCT

With respect to promotional statements or other claims made on social media platforms and on other non-traditional media about LCH and our offerings, Sponsored Endorsers must adhere to the following principles:

They may only make statements that reflect their honest beliefs, opinions, or experiences; and are transparent about their connection to us.

They may not: (1) make deceptive or misleading claims to consumers about our offerings or our competitors' products, facilities or services; (2) make any claims about our offerings, or our competitors' products, facilities or services, that are not backed up by evidence; (3) disclose any of our confidential information; (4) engage in any communication that is defamatory or infringes upon the intellectual property, privacy, or publicity rights of others; (5) offer for sale or solicit products or services on behalf of LCH; (6) make offensive comments that have the purpose or effect of creating an intimidating or hostile environment; (7) use ethnic

slurs, personal insults, obscenity, or other offensive language; or (8) make any comments or post any content that in any way promotes unsafe activities that could lead to an unsafe situation involving Live! Casino & Hotel's visitors or other individuals.

DISCLOSING A MATERIAL CONNECTION CLEARLY AND CONSPICUOUSLY

LCH requires Sponsored Endorsers, when posting about our facilities and/or offerings, to disclose their material connection to us clearly and conspicuously. This policy does not require specific language to disclose a material connection, but Sponsored Endorsers must communicate the material connection effectively so that consumers: (1) can easily find it; (2) can easily understand it; and (3) obtain sufficient information to make a judgment about the value of the endorsement. Sponsored Endorsers may consult this Policy for examples of language that successfully communicate a material connection and language that does not do so.

To ensure a disclosure is clear and conspicuous, appropriate consideration should be given to the limitations and nature of the platform being used. Sponsored Endorsers must ensure the disclosure is well-placed so it can be easily noticed and prominent so it can be easily read. The disclosure should be easy to notice and read in the time that followers have to look at the image; and well-contrasted against the image.

In video posts, including podcasts place the disclosure both within the video itself, and in the description of the video; and display the disclosure long enough for a consumer to be able to read and understand it. In Instagram posts, disclose a material connection before the "More" button. For a live stream, repeat the disclosure as needed to ensure that consumers see it or keep it posted throughout the live stream. If the posts are part of an online chat or tweets, or a similar thread, make the disclosure clearly in the first entry into the conversation thread, and then add to subsequent entries at regular intervals, depending on the media and the length of the thread. For a television or radio talk show appearance, disclose the material connection verbally when promoting our facilities or offerings.

If we ask consumers to promote our offerings or facilities on social media in exchange for the chance to win a prize, the official rules must require entrants to disclose the fact that the entrant's post is an entry into a contest or sweepstakes. Whether LCH is promoted in a text, a hashtag, a photo, or a video, the entry post must include some clear and conspicuous indicator that the consumer has received an entry in a promotion in exchange for the post. For example, the official rules could require entrants to use a specific hashtag disclosing that the post is a sweepstakes or contest entry. Failure to make the disclosure should disqualify the entry. We should avoid encouraging endorsements that use features that do not allow for clear and conspicuous disclosures, such as likes, pins, or shares, if the absence of that disclosure is likely to be misleading. A social media platform may have a required tool or feature for paid endorsements. Though these tools or features must be used to comply with the platform's rules, they should not be relied on alone to meet FTC disclosure requirements.

WHAT WE MUST PROVIDE TO SPONSORED ENDORSERS

When we engage a Sponsored Endorser, either directly or through a supplier, the Sponsored Endorser must sign a LCH Influencer Agreement, which incorporates by reference the terms of this Policy and other relevant binding documents.

MONITORING SPONSORED ENDORSERS

LCH may monitor the posts of each Sponsored Endorser to ensure the accuracy of any measurable claims made about us or our offerings and to ensure that Sponsored Endorsers have adequately disclosed their material connection to us.

WHEN A SPONSORED ENDORSER FAILS TO COMPLY WITH THIS POLICY

LCH must correct any failure to disclose a material connection or communication of any unsubstantiated claims by a Sponsored Endorser. In such event, we shall take one or more of the following steps: (1) If an

agency or other third party manages or is otherwise involved with the Sponsored Endorser relationship, alert the third party to the issue. (2) Consult with the Sponsored Endorser to determine whether a correction is needed, and how best to make it. (3) If needed, require the Sponsored Endorser to make the correction or post the correction on the Sponsored Endorser's post or page directly. (4) Determine if it is necessary to withhold payment from the Sponsored Endorser and/ or terminate the relationship with the Sponsored Endorser.

ADMINISTRATION OF THIS POLICY

Our Legal Department is responsible for the administration of this Policy. If you have any questions regarding this Policy, please contact our Legal Department at legal@marylandlivecasino.com.

BEST PRACTICES FOR DISCLOSURE LANGUAGE

As stated in the Policy, Sponsored Endorsers are required to disclose material connections to LCH Listed below is sample disclosure language. Alternative but substantively comparable language may also be used where appropriate. Although LCH does not require specific disclosure language, it does prohibit certain hashtags and other disclosure practices specifically found by the Federal Trade Commission ("FTC") as insufficient. The goal for a material connection disclosure is to ensure it is readily seen and understood by consumers.

If using a hashtag to identify a material connection, make it unambiguous, such as:

- #ad.
- #paid.
- #sponsored.
- #[name of brand]ambassador.
- #[name of brand]endorser.
- #[name of brand]partner.

Avoid ambiguous hashtags to identify material connections, such as:

- #sp.
- #spon.
- #thanks[name of brand].
- #team[name of brand].
- #ambassador.
- #consultant.
- #partner.
- #adviser.
- #collab.