



CoStar Guidebook

Guide To Your Success

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Table of Contents:

Introduction

Page 4	Your Guide to Success
Page 5	At-Will Employment
	Diversity
	Equal Employment Opportunity

Employment

Page 5	Introductory Period
Page 6	CoStar Classifications
	Job Opportunities
	Learning and Development
Page 7	Meals
	Recognition
	CoStar Style

Compensation

Page 8	Time Keeping
	Work Hours
	Pay Periods
	Direct Deposit
Page 9	Paycard
	Overtime
	Tip Compliance

Benefits

Page 10	Medical Plan
	Dental Plan
	Vision Care
	Prescription Drugs
	Short Term Disability
	Additional Insurance Coverage
Page 11	401(k)
	Continuation of Benefits COBRA
	Benefit Enrollment

Programs and Services

Page 11	Communication
Page 12	Education Assistance
	Self Serve
	Paid Time Off (PTO)
Page 13	Leave of Absences
	Bereavement
Page 14	Medical Leave
	Military Leave
	Personal Leave
	Jury Duty

Page 15	Work Related Illness & Injury
	Standards of Conduct
Page 17	Problem Solving (Conflict Resolution)
	The Cosmopolitan of Las Vegas Peer Review
Page 18	CoStar Relations
	AlertLine
	Attendance
Page 19	Grooming and Appearance
	Non-Uniformed CoStars
Page 20	Uniformed CoStars
	General Guidelines: Hair, Mustaches, Beards, Tattoos, Hygiene, Jewelry, Fingernails, Eyewear, Fragrances, Tags, Make-up, Footwear
Page 22	Breaks
	Personal Phone Calls, Cell Phones, Blackberries and PDAs
Page 23	Conflict of Interest
	Counseling Notices
	Work Cards
Page 24	Gaming Registration
	I.D. Badges
	Entering the Resort
	Outside Employment
Page 25	Confidentiality
	Media & Press
	Guest & Celebrity Treatment
Page 26	Work Areas
	Solicitation and Distribution
	Company and Personal Property
Page 27	Lost and Found
	Use of Facilities
Page 28	Responsible Gaming
	Underage Gaming
Page 29	Report Arrests
	Parking
	Contact Information
	Employment of Relatives and Cohabitant
Page 30	Smoking
	Harassment-Free Workplace
Page 32	Drug Free Workplace
Page 33	Alcohol and Drug Testing
	Workplace Violence
	Business Use of Social Media
Page 35	Personal Use of Social Media

INTRODUCTION

Your Guide to Success

We are excited to have you join The Cosmopolitan of Las Vegas Community and look forward to the contribution you will make. It takes the total engagement and dedication of every CoStar to make our Company a success. We aspire to create a strong community that is comfortable, yet disciplined. Let's work together to build a good company with meaningful difference.

This guidebook, Your Guide to Success, provides a framework of support as you begin your journey at The Cosmopolitan of Las Vegas. The policies and procedures outlined in this guidebook will be a helpful resource for you. Inside this guidebook, you will find tools to get you started general summaries of our expectations, Company policies, practices and benefits. We ask that you review this information thoroughly; you are responsible for being familiar with the content of this guidebook and observing the guidelines included. Please direct any questions you have to your Supervisor or to the People Department.

The Cosmopolitan of Las Vegas reserves the right in its sole discretion to deviate from the policies and practices outlined in this guidebook and make any changes or revisions deemed necessary. Changes may include rescinding or adding to any policy, procedure, benefit or practice described in this guidebook. Changes and/or revisions may be made without prior notice to CoStars; however, CoStars will be notified that the new information is available and where to access such revisions. It is your responsibility to stay current and comply with all policies and procedures. To the extent that any provision of applicable federal, state or local law is inconsistent with the provisions of this guidebook, such law prevails.

This CoStar guidebook is not intended as an employment contract; either expressed or implied, and accordingly, should not be construed as such. Nothing in this guidebook should be relied upon as a guarantee of certain privileges, working conditions, length of employment, or continued employment.

At-Will Employment

The Cosmopolitan of Las Vegas is an at-will employer. This means that either you or the Company may terminate the employment relationship at any time, for any reason or for no reason, with or without notice. Only an authorized officer of the Company may alter this at-will relationship. Any such alteration must be in writing, signed by an authorized officer of the Company.

Diversity

The Cosmopolitan of Las Vegas fosters a work environment where diversity is valued and everyone is treated with respect, trust and understanding. Embracing diversity is essential to our growth as individuals and as a Company. By creating an environment that draws upon the strength of the diversity of our CoStars, we can exceed guest expectations.

Let's make it a priority to satisfy the diverse and changing needs of our communities, our business partners, our guests, and our CoStars by developing an understanding and appreciation of the many advantages that different people contribute to the richness of our culture and unite us.

Equal Employment Opportunity

The Cosmopolitan of Las Vegas is proud to be an Equal Opportunity Employer (EOE). We promote equal opportunity in the areas of recruitment, employment, training, development, compensation, benefits, and promotions. Our employment practices are without regard to race, color, religion, creed, gender, age, sexual orientation, marital status, disability or medical condition, national origin, veteran status, or any other category or status protected by federal, state, and local anti-discrimination laws.

EMPLOYMENT**Introductory Period**

The first 90 days in your new position is your introductory period. This time period gives you and your Supervisor the opportunity to evaluate your compatibility with your new role. Your Supervisor will evaluate your performance and suitability for continued employment and overall fit with the Company. You can decide if the new position meets your expectations. You or your Supervisor may end the employment relationship at any time and for any reason, without notice during the introductory period.

For On-Call CoStars, the introductory period will be 90 days, if the CoStar has completed 40 shifts within the 90 day period. If the On-call CoStar has not completed the 40 shifts within the 90 day period, the CoStar will continue to be considered an introductory CoStar until he/she completes 40 shifts.

If you terminate your employment with The Cosmopolitan of Las Vegas and you are rehired, you are required to complete a new introductory period.

CoStar Classifications

Your employment classification determines your work schedule and benefits eligibility. Speak with your Supervisor to confirm your status. The Cosmopolitan of Las Vegas classifies CoStars as follows:

- Temporary:** CoStars who may be employed for specific projects for duration of up to 90 days.
- On-Call:** Costars who work for short or intermittent periods.
- Part-Time:** CoStars who work an average of less than 30 hours per week.
- Full-Time:** CoStars who work an average of more than 30 hours per week.

Job Opportunities

We have an opportunity to be a great place to work, to do something different that matters, and to tell our story. We will be successful as a team of CoStars that support one another in their efforts to provide our guests with outstanding service on a daily basis.

The Cosmopolitan of Las Vegas wants passionate, world aware, courageous team players. We will recognize great performance by providing opportunities for advancement, growth, and development. You may pursue your career aspirations by applying for a transfer or promotion after six months of continuous service. Open positions will be posted on the Company's website. You will be considered for a transfer based on the following criteria:

- Previous work experience and/or training for the position
- Overall personnel file and work history
- Attendance record
- Length of service
- Demonstration of core values
- Core competencies for the position

To apply for a transfer, you must complete a transfer inquiry on the Company's web site. Your Supervisor must acknowledge receipt of the online request which will then be sent to the Talent Acquisition Team.

All CoStars will enter into the introductory period upon being transferred or promoted.

Learning and Development

As part of our commitment to excellence, we highly value learning. The Cosmopolitan of Las Vegas wants CoStars to have the opportunity to grow and to continue to develop job and career enhancing skills.

The following is a sample of some of the learning opportunities offered at The Cosmopolitan of Las Vegas:

- Giving More
- Connect
- Job Skills Training
- Leadership Training
- English as a Second Language
- eLearning for all CoStars

Meals

You are welcome to dine at CO*, the CoStar Dining Room, which serves healthy meals 24 hours a day in a comfortable environment.

Please remember the following CO* guidelines:

- Family and friends may not eat in CO*
- Food, including condiments may not be removed from CO*
- Covered beverages may be taken back to your work area
- Bus your table and place your tray at the drop off station

Recognition

We recognize and reward those CoStars who show a passion for the highest levels of guest service and excellence in their day to day work. We notice your thoughtful initiative, inspiring courage, and bright personality. Without the hard work and dedication of our CoStars, The Cosmopolitan of Las Vegas would not be the dynamic, world-class resort destination that it has become. The Cosmopolitan of Las Vegas recognition programs highlight CoStars who exemplify the highest standards of our team. These outstanding CoStars receive awards, and recognition that we all can be very proud of promoting property wide.

CoStar Style

What you wear plays a part in defining your character, so we've designed world class attire to help you dress the part. Professionally designed CoStar uniforms are provided to many of our CoStars. Treat your uniform with care and special attention to its condition. Report any needed repairs to the Garment District. There may be a cost to you for replacement uniforms or items lost or not returned.

All CoStars provided with uniforms are expected to report to the Garment District daily to obtain the uniform for the day and return the uniform to The Garment District at the end of the shift.

You will receive a garment bag with your uniform from the Garment District. Place your personal clothing items in the bag for storage in the Garment District during your shift. Please do not place any valuable items in the bag or put more than 10 pounds of clothing into the bag.

The Cosmopolitan of Las Vegas is not responsible for the safety or security of any valuable items left in the garment bag. Leave valuables at home. Garment bags are Company property and are subject to search at any time with or without notice. In addition, please check with your individual department to determine what additional accessories, if any, will be needed to complete your CoStar uniform.

COMPENSATION

Time Keeping

By following the Company's time keeping procedures, you will be properly paid. Federal and state laws require us to keep accurate records of CoStar work time in order to calculate CoStar pay and benefits. Time worked is the time actually spent on the job performing your assigned duties.

If you are paid based upon the number of hours you work, you must accurately record the time you begin and end work. Tracking time for another CoStar and any falsification of your time is a violation of the Company policy and is grounds for disciplinary action, up to and including termination.

Leave yourself extra time to go to the Garment District and change into your uniform so that you are able to report to your workstation at the start of your shift.

Work Hours

Your Supervisor establishes the time and duration of your work hours based on workload and the goal of providing excellent guest service while efficiently managing CoStar resources and complying with all applicable laws.

To further enhance our guest experience, you may be required to work mandatory overtime or additional hours beyond your normal work schedule. Your Supervisor will give you as much advance notice of overtime as possible. All overtime hours, and/or work performed before or after scheduled shift must be authorized by your Supervisor.

Pay Periods

A regular workweek is 40 hours from 12:00am Monday through 11:59pm Sunday. Each year contains 26 pay periods. Paydays occur every other Friday. Unfortunately, we are unable to grant pay on a different schedule.

Direct Deposit

This convenient service automatically deposits your paycheck into your savings or checking account. You may sign up for direct deposit in the People Department or the Payroll Department.

Paycard

For CoStars who chose not to sign up for direct deposit into a bank account, a Paycard will be issued to the CoStar.

Paycard is a personal ATM/debit account funded by your pay. Your pay will be deposited directly into your Paycard Account every payday so you have immediate access to your money. You can use a Paycard just like an ATM/debit card to make purchases from merchants who accept VISA debit card transactions. Checks will also be made available for you to access your funds. A fee will be deducted from your account balance for certain services and transactions.

Overtime

Hourly CoStars who work more than 40 hours during a workweek are eligible for overtime pay as mandated by law. If you are an eligible CoStar, you are not permitted or authorized to work any period of time beyond your regularly scheduled time unless directed by your Supervisor. Overtime must be authorized in advance. Unapproved overtime could lead to disciplinary action, up to and including termination.

Overtime pay is equal to one and one-half times your hourly rate for all hours worked in excess of 40 hours during a work week. Comp time cannot be awarded as a substitution for overtime compensation.

Tip Compliance

The Cosmopolitan of Las Vegas participates in a Gaming Industry Tip Compliance Program with the Internal Revenue Service. This program has several advantages, including audit protection for tip income from the date you begin to participate. If you are working in a tipped position, be sure to ask your Supervisor for a Gaming Industry Tip Compliance Program participation form.

BENEFITS

The Cosmopolitan of Las Vegas is proud to offer a competitive benefits package. In addition to a competitive wage, you will enjoy a comprehensive health care plan, including medical, dental, vision, prescription drugs, disability insurance and more.

All full-time CoStars are eligible to participate on the first day of the month after 3 full months of employment in the above noted benefits. CoStars are eligible to participate in the 401(k) plan after 12 months of employment, 1000 hours of service and being age 21 or older. The following provides only a general and brief description of some of these benefits. You should consult all summary plan descriptions (available in the People Department) for a complete disclosure.

Medical Plan

Our medical plan offers flexibility and coverage at a low cost for you and your family.

The plan offers:

- Predictable, affordable co-payments
- Urgent and emergency care services and hospitalization
- An extensive provider network
- Preventive health services
- Telephone advise nurse service
- Health education and wellness programs

Dental Plan

You can choose any dentist outside the provider network or save money by choosing a dentist within our provider network. All diagnostic preventive care is covered at 100%, if provided by a dentist in our network.

Vision Care

You have vision care coverage available to you and your family at any vision care provider. The plan covers eye exams, frames and lenses or contacts.

Prescription Drugs

Our prescription drug benefit gives you two options: fill your prescriptions at one of the many pharmacies in our network or submit the prescription to our mail-order service. You pay small co-pay for generic prescriptions. If you prefer the brand name drug you are responsible for paying the difference in the cost between the generic, preferred brand and non-preferred brand name.

Take advantage of the savings and convenience of our mail-order pharmacy benefit for maintenance medication needs.

Short Term Disability

The Company provides you with short term disability, which is a percentage of your weekly salary for up to 11 weeks. There is a 15 day waiting period.

Additional Insurance Coverage

You may also purchase an array of special insurance policies at group rates:

- Term Life Insurance coverage for yourself
- Term Life insurance coverage for your spouse and eligible child(ren)
- Long Term Disability Insurance

401(k)

It is never too early or too late to start saving for your financial future. Set money aside for your future and take advantage of The Cosmopolitan of Las Vegas' 401(k) plan to maximize your money's earning potential.

- Enjoy the benefits of pre-tax 401K savings
- Direct your money into a combination of several investment options, ranging from conservative to high risk.

Continuation of Benefits COBRA

Under the Consolidated Omnibus Budget Reconciliation Act (COBRA), you and your eligible dependents may qualify for a temporary extension of coverage if you leave the Company or become ineligible for continued participation in the Company health plan.

If you leave the Company or your benefits eligibility status changes due to an employment status change or other event, the People Department will notify appropriate providers regarding the change in status. COBRA administrators will then send CoStar options for continuing coverage. Generally, eligible CoStars who pay the entire COBRA premium may continue coverage for up to 18 months or longer depending on the circumstances. Contact the People Department with any questions regarding continuation of coverage and benefit eligibility.

Benefits Enrollment

Upon your eligibility for benefits, you will be invited to attend a Benefits Enrollment meeting, where a Benefits representative will explain the various benefits plans that are offered. It is your responsibility to ensure that benefit elections are made within 31 days of eligibility. If you fail to enroll within this period, we understand that you are waiving benefits under the Company. In this situation, you will not be eligible for benefits until open enrollment for the following plan year.

Any life style changes such as birth, adoption, marriage or divorce must be requested within 31 days of the change and supporting documents must be provided to add or remove a dependent.

PROGRAMS AND SERVICES**Communication**

We invite you to participate in our community. Get involved and start an on-going dialogue with fellow CoStars. We want you to stay informed about daily activities throughout the resort and all other important CoStar information. Watch for posters, displays and announcements on the back of house monitors for updates about general CoStar information, resort news and guest service details.

Your Supervisor is the first and most important point of contact related to matters concerning yourself and your job. Ask questions and talk with your Supervisor frequently about any ideas, suggestions or concerns you may have.

Education Assistance

Our community is a platform for possibility. The Cosmopolitan of Las Vegas encourages you to explore and develop your talents, and offers support of continuing education. Depending on the type of class and your grade, you may be eligible to receive up to 100% reimbursement for your tuition, books, and fees (up to \$1,000.00 per year). This program is available to all regular, full-time CoStars, who have completed 1 year of service. Please contact the People Department for complete details on how to take advantage of this valuable benefit.

Self Serve

The Cosmopolitan of Las Vegas offers CoStars a unique way to stay electronically connected to all of their needs through the CoStar Self Serve. You may make changes to your personal information 24 hours a day seven days a week.

Log on to your account for the following planned services:

- View and print paystub
- Request time off
- Change your address, phone number or emergency contact
- Learn more about your benefits
- Change your W-4 and review your W-2s
- Review and apply for job opportunities
- Read important Company news and information
- Check out current CoStar offers

You may log on to your account from any of the CoStar kiosks located in the heart of house at <http://webapp01v:9081/SHCM/>.

Your account has already been activated. Use your first initial, last initial in upper case and CoStar ID number and the last four digits of your social security number as your PIN when you log in for the first time. The system will then prompt you to change your PIN. If you lose or forget your PIN, stop by the People Department to have it reset.

Personal Time Off (PTO)

We encourage you to spend time away from your job resting, recreating and rejuvenating with our Paid Time Off (PTO) benefit. Our regular, full-time and part-time CoStars begin accruing PTO immediately.

PTO is accrued based on hours worked with a maximum accrual as listed in the schedule below:

Service Period	PTO Day per Year	Maximum Days to Carry Over to the Next Year
First Year	15.0	15.0
2 Years to 5 Years	20.0	30.0
6 Years to 11 Years	25.0	35.0
12 Years +	30.0	40.0

Once you complete your 90 day introductory period, you may begin to use your earned PTO time. You can submit an electronic request for PTO on the CoStar Self Serve at <http://webapp01v:9081/SHCM/>.

Requests should be made at least two weeks in advance. PTO time must be earned in order to receive pay for time away. Your Supervisor will attempt to accommodate your request while balancing operation needs, guest demands and deadlines. The Cosmopolitan of Las Vegas retains the right to decline or modify your time off requests based on guest commitments and other work requirements. PTO will be paid in 8 hour increments only.

You are encouraged to take your earned PTO time each year. PTO carries over one half of the previous year accrual year to year. You cannot be paid for PTO in lieu of using the paid time off. It is the practice of The Cosmopolitan of Las Vegas to pay out any unused PTO hours if you leave the Company and give two weeks' notice of your resignation. PTO will not be paid out for terminations due to gross misconduct.

PTO is paid at your base pay rate at the time of the leave. It does not include overtime or any special forms of compensation such as incentives, bonuses, or shift differentials.

Leave of Absences

A leave of absence or "LOA" may be granted if you need to be away from work. Request for leaves of absences must be submitted to The People Department at least 30 days in advance or, in case of an emergency within 48 hours of the occurrence. LOAs are longer than four (4) scheduled days of absence. You will need to make arrangements to pay your medical premiums while you are not receiving a regular paycheck. Benefits will be terminated if the premiums are more than 30 days late. CoStars who miss 5 consecutive days of work and who do not qualify for a leave of absence will be subject to disciplinary action as outlined in the Attendance Policy.

Bereavement

In the case of death of a relative, full-time CoStars, who have completed their introductory period, are entitled to a maximum of three (3) days or 24 hours of paid absences.

For purposes of funeral leave, immediate family is defined as:

Spouse	Parent
Domestic Partner	Step Parent
Grandparents	Grandchildren
Child	Brother
Step-Child	Step Brother
Sister	Mother or Father in-law
Step-Sister	Sister or Brother in-law

Any individual legally acting in one of the above capacities.

Medical Leave

The Cosmopolitan of Las Vegas provides you with unpaid medical leave as provided under the Family Medical Leave Act (FMLA) to care for your own serious health condition, the serious health condition of a close family member, for the birth or adoption of a child, a current family member of the Armed Forces or qualifying exigencies. Please contact The People Department to review the medical leave policies or for additional details.

Military Leave

The Cosmopolitan of Las Vegas supports CoStars who serve in the armed forces of our country, in compliance with the Uniformed Services Employment and Reemployment Rights Act (USERRA). Please be sure to advise your Supervisor immediately, if you are called to active duty.

Personal Leave

Requests for personal leave are individually considered, and the decision to grant or deny a leave is based on the particular circumstances of each case. Personal leaves are unpaid and may be granted for a period of five consecutive days or more up to a maximum of 30 days taken in any rolling 12 month period, including any paid time off taken as part of the leave. Earned PTO is to be substituted for all or part of a personal leave.

You may be requested to submit a statement explaining the specific reason for your request. Working at another job while on a leave of absence is not permitted.

Jury Duty

We encourage our CoStars to support our country's judicial system by serving jury duty as required. To ensure full-time CoStars do not suffer any financial loss, management will make up the difference between the jury pay received and regular pay (excluding tips and overtime). The maximum time allowed for such jury duty is twenty (20) days within a one-year period.

You are responsible for advising your Supervisor when you receive a jury summons.

To receive a payment for the difference you must provide to The People Department a copy of the court compensation and submit the attendance slip provided by the court.

Work Related Illness & Injury

From your first day on the job, you are covered for any work-related accident or injury. State and federal laws determine workers' compensation benefits.

The Cosmopolitan of Las Vegas provides Workers' Compensation insurance for all CoStars and we pay the full cost of this coverage. Workers' Compensation benefits include payment for medical treatment and the partial payment of lost wages. Wage benefits generally begin several days after disability occurs. The benefit amount is determined by the insurance company, in accordance with state law. In the event of death due to a work-related injury or illness, a death benefit may also be paid to surviving spouse and/or children.

Workers' Compensation wage benefits generally do not cover full salary. Available PTO may be paid to make up the difference between Workers' Compensation benefits and your wage or salary. Once PTO is used, you will receive only the designated Workers' Compensation benefit.

Standards of Conduct

Our Company policies and practices are in place to create a work environment that encourages integrity, respect and allows our CoStars to feel comfortable and safe. As a CoStar, you are expected to adhere to all Company policies and exhibit a high standard of professionalism.

CoStars are expected at all times to conduct themselves in a positive manner in order to promote the best interests of the Company. Appropriate CoStar conduct includes:

1. Treating all guests, visitors, and CoStars in a courteous manner
2. Reporting to management suspicious, unethical, or illegal conduct by CoStars, guests, or suppliers
3. Reporting to management any threatening or potentially violent behavior by CoStars
4. Cooperating with Company investigations
5. Complying with all Company safety and security regulations
6. Wearing clothing appropriate for the work being performed
7. Performing assigned tasks efficiently and in accordance with established quality standards
8. Reporting to work punctually as scheduled and being at the proper workstation, ready for work, at the assigned starting time
9. Giving proper advance notice whenever unable to work or report on time
10. Smoking only at times and in places not prohibited by Company rules or local ordinances
11. Eating meals only during meal periods and only in the designated eating areas
12. Maintaining cleanliness and order in the workplace and work areas

Below is a list of some behaviors or conducts that are considered unacceptable at The Cosmopolitan of Las Vegas. These rules may be changed or added to at any time by The Cosmopolitan of Las Vegas. Engaging in any one of the following acts may result in discipline up to and including immediate termination:

1. Engaging in or threatening acts of workplace violence, including but not limited to:
 - a. Possessing firearms or other weapons on Company property;
 - b. Fighting or assaulting a CoStar, security agent, or guest(s);
 - c. Threatening or intimidating a CoStar, security agent, or guest(s);
 - d. Engaging in any form of sexual or other harassment.
2. Reporting to work under the influence of alcohol or illegal drugs or narcotics or using, selling, dispensing, or possessing alcohol or illegal drugs or narcotics on Company premises;
3. Disclosing trade secrets or confidential Company information (this prohibition does not apply to any information related to wages and other terms and conditions of employment).
4. Falsifying or altering any Company record or report, such as an employment application, medical reports, production records, time records, expense reports, absentee reports, or shipping and receiving records;
5. Stealing, destroying, defacing, or misusing Company property or another CoStar's or guest's property;
6. Misusing Company communications systems, including electronic mail, computers, internet access, and telephones;
7. Refusing to follow management's instructions concerning a job-related matter or being insubordinate;
8. Failing to wear assigned safety equipment or failing to abide by safety rules and policies;
9. Soliciting or distributing in violation of Company policies;
10. Smoking where prohibited by local ordinance or Company policies;
11. Using profanity;
12. Sleeping on the job;
13. Gambling on Company property except as expressly permitted by the Company;
14. Lending or borrowing money from other CoStars, guests or clients;
15. Walking off the job or the Company premises during assigned working hours without approval or authorization;
16. Hustling or soliciting gratuities or suggesting that a gratuity is insufficient, required or expected;
17. Failure to report to your Supervisor any arrests, indictments or being charges with a crime by a governmental authority;
18. Playing pranks or engaging in horseplay;
19. Wearing improper attire or having an inappropriate personal appearance.

The Company respects your right to express personal opinions about The Cosmopolitan's policies, The Cosmopolitan's treatment of you, or the terms and conditions of your employment. Nothing in this Standard of Conduct policy is intended to interfere with your rights under federal and state laws, including the National Labor Relations Act.

The examples of impermissible behavior described above are not intended to be an all-inclusive list. At management's discretion, any violation of the Company's policies or any conduct considered inappropriate or unsatisfactory may subject the CoStar to disciplinary action. Disciplinary action may vary depending on the seriousness of the offense, the circumstances under which it occurred, your duties, your length of employment, your overall work record, including any prior disciplinary action, and any other relevant information. Discipline can take one of the following forms:

- Verbal Counseling
- Written Counseling Notice
- Final Written Warning
- Suspension from work
- Termination

Any or all of these steps can be omitted based on the seriousness of the offense. Under certain circumstances, immediate suspension or termination may be issued at the Company's discretion.

Questions about this policy should be directed to the Talent Engagement Manager.

Problem Solving (Conflict Resolution)

The Cosmopolitan of Las Vegas is committed to working directly with CoStars to solve problems in a timely and fair manner. You are encouraged to bring your concerns, suggestions and questions to management. One way to solve a problem that affects your ability to do your job is to discuss it with your Supervisor. In most cases, your Supervisor will have the knowledge and insight to help you resolve the matter quickly. If you are unable to resolve the problem with your Supervisor, speak with your Department Manager or Vice President. We are confident that open communication will solve most problems that arise in the workplace.

The Cosmopolitan of Las Vegas Peer Review

CoStars who have completed their introductory period may request a Peer Review for a Last and Final Written Warning or termination of employment. Prior to requesting a Peer Review, you must have attempted to resolve the issue within your chain of command through the Management Open Door process.

You are eligible for The Cosmopolitan of Las Vegas Peer Review if you are in one of the following positions: Hourly Non-Union, Front Line Supervisors and some salaried positions such as Coordinators and Administrative Assistants. The Peer Review Panel is composed of both management and non-management CoStars.

The Cosmopolitan of Las Vegas Peer Review Panel consists of three impartial members, one CoStar who works within the requesting CoStar's division, one CoStar who works outside of the requesting CoStar's division, and one member of management who works outside of the requesting CoStar's division. The three Panelists will be randomly selected by the People Department from the pool of CoStars and members of management.

To request a Peer Review or for guidelines, please contact the People Department.

CoStar Relations

Formal methods of resolving workplace problems also exist. The CoStar Relations team is available to discuss any problem you may have and answer questions about Company policies and procedures. Call or stop by the People Department for assistance.

AlertLine

Our policies prohibit any form of retaliation against CoStars when they bring problems to our attention. There are some circumstances when you may not always feel comfortable coming forward. The Cosmopolitan of Las Vegas employs an independent company AlertLine to operate a CoStar ethics and compliance hotline. This service provides you with an additional way to voice your concerns and help the Company identify serious issues early and to report any type of illegal, unethical or unsafe behavior at work, including theft, discrimination, workplace violence, or fraud. The service is available 24 hours a day, seven days a week, and you are not required to give your name when you call. The AlertLine phone number is 877.635.2796. Remember it is important to speak up when you know things are wrong. We all share the responsibility of ensuring that The Cosmopolitan of Las Vegas continues to be an honest, safe and productive place to work.

Attendance

Being successful and professional in our jobs includes being on time and ready to work as scheduled. Attendance is an important part of the overall job performance. Work schedules are based upon business demands and CoStars are required to work as assigned.

CoStars are responsible to notify their Supervisor a minimum of four (4) hours in advance of the beginning of the scheduled shift whenever the CoStar is unable to report to work. It is also important to notify the Supervisor as early as possible if the CoStar will be late for the start of their shift. Communication is key.

Excessive tardiness, leaving work early and/or absenteeism will be treated as a violation of our standards of conduct; progressive discipline will be implemented appropriately. CoStars can expect verbal counseling and/or written documentation up to and including termination of employment for attendance issues.

A “no call/no show” could result in immediate termination of employment. “No call/no show” is considered as any failure to report as scheduled and failure to contact your Supervisor in advance of your absence.

Grooming and Appearance

Your appearance reflects the image of The Cosmopolitan of Las Vegas. Your neat, clean and well-groomed appearance enhances The Cosmopolitan of Las Vegas experience for our guests. Listed below are general guidelines intended to help CoStars understand the high standards that our CoStars are expected to meet. These guidelines help define what is meant by “professional and well-groomed” appearance. However, since the definition of “professional and well-groomed” will always remain somewhat subjective, the Company reserves the right for management to have the final determination on whether a CoStar’s appearance complies with our standards.

In addition to the guidelines set forth below, many departments have additional, more specific guidelines that address appearance, safety, health or security considerations.

(CoStars are expected to comply with all guidelines specific to their positions. These guidelines listed below are meant to be the minimum Appearance Standards.)

Non-Uniformed CoStars

Appropriate business attire should be worn during business hours. Clothing must be neat, cleaned and ironed at all times.

Male – Business Attire

Dress Shirts – preferably white in color

Business Suits – black, gray or navy

Ties – professional, polished style and keeping with the vibe of the brand. No logoed or themed ties are allowed

Belts, dress shoes and dress socks

Male – Business Casual Attire

Casual Slacks

Collared shirts without ties

Golf or polo style shirts with collars

Sweaters, cardigans, turtlenecks

Belts, socks, dress shoes/loafers

Female – Business Attire

Skirts or dresses no shorter than 3 inches above the knee

Business suits

Blouses
Blazers or sweater sets
Pant suits, dress pants (ankle length)
Dress shoes

Female – Business Casual Attire

Casual skirts or dresses no shorter than 3 inches above the knee
Casual slacks (ankle length, no capris or culottes)
Dressy sandals
Sleeveless shirts, blouses, dresses or sweaters
No hosiery required with skirts or dresses, but if hose are worn they are not to be textured.

Not Acceptable at any time:

1. Shorts, city shorts, skorts, culottes
2. Mini skirts
3. Jeans of any color
4. T-Shirts
5. Athletic style clothing
6. Sweat pants/tops, wind suits or jogging suits
7. Stirrup pants or leggings
8. Casual sandals, flip flops, thongs, or hiking boots
9. Halter tops, tube tops, sundresses or anything too form fitting, low cut or revealing
10. Hats or caps unless part of a uniform

Uniformed CoStars

Each uniform has specific style guidelines to follow as set forth by the Department. Uniforms must be neat, clean, ironed and in good repair at all times.

CoStars are expected to follow all guidelines as specified by the department.

General Guidelines

Hair: Hair must be neat, clean and appropriate based on business standards and be worn in a manner that does not block side vision, or cause a safety hazard. Hair length for male CoStars cannot be longer than 1 inch below shirt collar. Extreme hairstyles (spikes, mullets, mohawks, tails, etc.) and unnatural hair color (pink, purple, orange, etc.) are not permitted. Excessive use of styling gels or mousse should be avoided. No large or extreme hair clips, pins and beads.

Mustaches: Mustaches may not exceed one-fourth inch below the corner of the lip with no extreme styles (e.g. no patches, handlebar, waxed or partial mustaches).

Beards: Beards or goatees must be neatly trimmed and clean and no more than one inch in length. Beards may be grown initially during scheduled time off of at least five days; no “shadow” beards are permitted. No soul patches, designs or facial hair that is not a complete beard, goatee or mustache are allowed.

Tattoos: Small visible tattoos are permitted if the tattoo is not extreme or distracting from the uniform or overall appearance. CoStars that have visible tattoos that do not meet standards must effectively cover them with make-up.

- No visible tattoos above the collar or neck of a shirt/uniform
- No visible tattoos or tattoo sleeves extending the length of the arm(s)
- No offensive tattoos permitted
- Tattoos that are extremist, indecent, sexist, or racist are prohibited

Management retains the right to determine if a tattoo is appropriate and will ask to have the tattoo covered if determined it is not appropriate for the work environment.

Tattoo appropriateness will be determined by the management, the department/job theme.

Hygiene: Good personal hygiene is a must (i.e. daily bathing, shaving, brushing teeth, use mouthwash and an effective deodorant).

Jewelry: Jewelry must be tasteful and not extreme in style or in size. No ear cuffs or facial jewelry are permitted. One simple nose ring (stud only) is acceptable. Bracelets should not interfere with job performance and should be limited in the number worn. Men may wear one small earring in the earlobe. Women may wear up to two earrings per ear which do not excessively dangle. Hoop earrings should not be larger than two inch in size. If ear lobe(s) have been stretched, then natural/skinned colored plugs must be worn. No other visible body piercing jewelry will be allowed, including tongue rings and clear studs.

Fingernails: Fingernails should be clean and neatly manicured. Women may wear well-maintained nail polish in non-extreme shades. Women’s nail length should not interfere with job performance and should not exceed ½ inch in length from the fingertip. Nail art is allowed provided it is tasteful; nail art colors may not be fluorescent or stark/gaudy contrast with the uniform and may not include extreme or offensive designs.

Eyewear: Dark and/or tinted glasses may not be worn indoors, unless medically necessary.

- Fragrances:** Subtle fragrances of cologne or perfume are acceptable. Scents can become overpowering for other CoStars and guests, use in moderation.
- Tags:** Stickers, buttons, decals, photos, or charms must not be attached to or affixed to the uniform or business attire, unless there is a legal right to do so.
- Make-up:** Make-up should be natural and tasteful and not excessive.
- Footwear:** Departments may set specific guidelines for shoes and hosiery. In general, proper footwear according to department standards/uniforms should be worn at all times in accordance with the following guidelines:
- Shoe heel height is not to exceed 3 inches.
 - Shoes must be polished/clean with no run down heels or holes.
 - Shoes socks and hosiery should be coordinated with the outfit.
 - Casual sandals, beachwear, athletic, moccasins or any other type of canvas shoes are not permitted.

Failure to comply with the specified appearance standards is considered insubordination as well as a violation of the Appearance Standards. Consequently, the CoStar is subject to disciplinary action, up to and including termination of employment. The Company administers this policy in compliance with all state and federal laws.

CoStars who do not meet Appearance/Uniform Standards may be sent home and will not be compensated for any work time missed because of failure to comply with this policy. CoStars that are sent home will not be permitted to work until their appearance meets department and Company standards.

Breaks

The Cosmopolitan of Las Vegas complies with all state and federal regulations regarding break and meal periods. Policies on taking breaks differ in each department. Make sure you ask your Supervisor about your break schedule and the facilities you may use when you start your new position.

Personal Phone Call, Cell Phones, Blackberries and PDAs

The Cosmopolitan of Las Vegas telephone lines are for business use only. Although pay phones are located near the resort lobby and convenient areas, they are for the exclusive use of our guests. You may utilize your personal cell phone or the telephones located in the back-of-the-house (non-public areas) before clocking in, during breaks, during lunch, or after clocking out only.

Cellular phones, blackberries, PDAs and beepers are prohibited from being used in any public area on property during scheduled work hours – with the exception of those authorized for business purposes. Personal cellular phones, blackberries, PDAs and beepers must be turned off and not visible during scheduled hours in assigned work areas. Recording devices cannot be used on property without prior approval from management; this includes the use of any types of cameras including cell phones.

Conflict of Interest

The Cosmopolitan of Las Vegas conflict of interest policy is applicable to all CoStars. You may not:

- Place yourself in a position of conflict between personal interest and those of the Company.
- Sell goods or services to The Cosmopolitan of Las Vegas.
- Seek or accept gifts (including below market purchases of goods or services) other than gifts of nominal value, considered customary and reasonable.
- Use your position to influence any type of business related decision that may be considered as a conflict of interest or result in personal gain.

Counseling Notices

Counseling notices may be issued when your job performance or personal behavior does not meet Company standards. You should discuss any issue that result in counseling with your Supervisor, so that you can take corrective action. Counseling notices are placed in your employment file and remain active for one year.

Work Cards

All work cards, licenses and/or certifications must be obtained prior to your first day of employment and must be kept current and valid during your employment with The Cosmopolitan of Las Vegas. The following are some examples of work cards that may be required for your position:

- Alcohol Awareness (TAM Card)
- Health Card
- Non-Gaming (Sheriff's) Card
- Driver's License
- Gaming Registration

It is your responsibility to keep the card(s) current and in your possession at all times, when you are on the job. In addition, if your job requires another type of certification you must keep the card(s) current and carry them while you are at work. CoStars are prohibited from working with an expired work card(s). Check with the People Department for information or renewing your licenses.

Gaming Registration Program

Depending on your position, you may be required to be registered with the Nevada Gaming Control Board. You will be notified 60 days in advance when your registration is about to expire. Be sure to pick up a registration packet from the People Department to renew it on time. You may not be able to work if your registration has expired.

I.D. Badges

You will be issued a Cosmopolitan of Las Vegas CoStar identification card to carry with you at all times at work. Your I.D. Badge is used to clock in and out of work and permits you access into the resort, parking lot and the CoStar Dining Room. Contact the People Department if you lose your card. A fee will be charged to replace a lost I.D. Badge.

Entering the Resort

You are required to enter and leave the building through the CoStar entrance. Please be prepared to show your I.D. Badge to Security at the entrance. You are not permitted in the back of the house during your off-duty hours unless you are taking care of Company-related business including but not limited to retrieving paychecks, applying for benefits, or submitting documents associated with medical leave. You may not use any other exit doors from the back of the house areas. These areas are restricted and monitored at all times. Violations of this standard may result in disciplinary action.

Outside Employment

You will be permitted to engage in outside employment as long as it does not conflict with your current position or with the Company's business. We reserve the right to prohibit outside employment that creates a real or potential conflict of interest to the Company or our guests. Failing to report outside employment that poses a real or potential conflict will result in disciplinary action, up to and including termination.

The CoStar should submit a written request to the People Department before obtaining outside employment that poses a real or potential conflict.

Examples of types of outside employment that pose an actual conflict are:

- Use of Company's equipment, supplies or facilities to benefit another employer.
- Performing services for a guest or potential guest for payment directly to you by the guest.
- Performing a service that the Company itself can perform.
- Employment that prevents you from meeting your responsibilities to the Company or to one of our guests. Not being able to meet guest needs or deadlines, being late for work, taking time away from work, or reporting to work not rested and unable to effectively perform job duties.

Confidentiality

The Cosmopolitan of Las Vegas deals with a range of confidential and proprietary materials that could cause damage to the Company, its CoStars, guests, and suppliers if disclosed to outside sources. This includes but is not limited to: trade secrets; private information about customers, service providers and suppliers; company financial information (this does not include information related to wages); non-public operational procedures and techniques that have a commercial value; strategic business plans; client lists; and price sheets. If, during the course of your employment, you acquire confidential or proprietary information such information must be kept confidential both during and after your employment with the Company, unless disclosure is otherwise protected by law.

This prohibition does not stop you from disclosing and sharing information relating to your wages and other terms and conditions of your employment.

CoStars that violate this policy may be subject to corrective action, up to and including termination.

Media & Press

It is imperative that one person speak for the Company to deliver an appropriate message and avoid giving misinformation. If someone from the press, publications, radio, TV, or other media asks you for information relating to The Cosmopolitan of Las Vegas and/or its guests, politely inform them that you are not authorized to comment on behalf of the Company and refer them to Public Relations.

Nothing in this Media & Press policy is intended to interfere with your right to talk with the Media, or anyone else, about your terms and conditions of employment or any other of rights you have under federal and state laws, including the National Labor Relations Act. The Company respects your right to express personal opinions and communicate concerning the terms and conditions of your employment.

Guest & Celebrity Treatment

It is essential that CoStars respect a guest and celebrity's right to privacy and discretion.

CoStars should remain professional in their language, tone, manner and actions while still demonstrating courtesy and friendliness with all guests.

Never reveal a guest or celebrity's presence (resort room numbers, dining arrangements, daily agenda or any other personal information) to any unauthorized individuals or to any CoStar who does not have a business need to know such information.

While it is exciting to see celebrities visiting our resort, we must be sure to maintain the highest level of professionalism and discretion. Do not take photographs or request autographs of celebrities.

Work Areas

Please keep your work areas neat, clean and safe at all times. You are responsible for the security of any personal items you store on Company property. The Company does not assume responsibility for the loss or theft of any CoStar's personal items.

Solicitation and Distribution

To minimize distractions in the work environment, The Cosmopolitan of Las Vegas limits the solicitation and distribution of materials/products by CoStars with the following rules:

- Solicitation or distribution of literature of any kind during the working time of the CoStar soliciting or the CoStar being solicited is not allowed.
- Working time is time when a CoStar is actively engaged in performing job duties. It does not include time when CoStars are on break, meal periods, or other periods during which a CoStar is not assigned to or expected to perform job duties.
- Solicitation by one CoStar of another CoStar is prohibited at all times on the gaming floor and adjacent aisles and corridors frequented by guests. These areas do not include the CO*, break areas, restrooms, sidewalks, parking lots, and garages.
- CoStars may not distribute any type of literature or printed material in work areas (including the gaming floor and adjacent aisles and corridors frequented by guests) at any time. Work areas do not include the CO*, break areas, restrooms, sidewalks, parking lots, and garages.
- Persons who are not Company CoStars are not allowed to access company property for the purpose of selling products or services, making solicitations, posting or distributing cards, literature, or other materials during working time.

Company and Personal Property

To maintain a safe and secure workplace, The Cosmopolitan of Las Vegas reserves the right to inspect all personal property brought onto Company property including vehicles, packages, briefcases, backpacks, clothing, handbags, lunch boxes, toolboxes, containers, and any other objects. The Company may inspect the contents of lockers, storage areas, file cabinets, desks and workstations at any time and may remove all Company property and items that violate Company rules and policies.

The misuse, unauthorized removal or destruction of Company property or property belonging to a guest or visitor may result in immediate termination. Additionally, if you observe or become aware of the misuse, unauthorized removal or destruction of property belonging to Company CoStars or guests, it is your responsibility to report this to your Supervisor immediately.

The Cosmopolitan of Las Vegas also reserves the right to use security cameras to record and monitor CoStar conduct on Company owned property. If criminal activity is suspected, recorded footage may be released to law enforcement agencies to facilitate prosecution. Any CoStar who fails to consent and fully cooperate with an inspection may face disciplinary action up to and including termination.

Lost and Found

You must turn in all articles of value, cash or chips found anywhere on property, including in the casino and resort floors to Security. Items may be held for a period of up to 60 calendar days or more, depending on the value. If the owner does not claim it within the required time, you may claim the item. Certain items such as personal identification may not be claimed. Ask your Supervisor to explain your department's specific lost and found procedures.

Use of Facilities

The Company recognizes the benefit of allowing CoStars to enjoy the products and services offered by The Cosmopolitan of Las Vegas. Off-duty CoStars are welcome as guests to The Cosmopolitan of Las Vegas restaurants, and retail shops within certain guidelines and with certain restrictions.

While on property, CoStars are expected to maintain conduct that is consistent with the Company's Standards of Conduct and Behavior.

CoStars should enter through public entrances when patronizing the property.

The consumption of alcoholic beverages on property is acceptable however CoStars must not be in uniform and off-duty a minimum of two (2) hours prior to alcohol consumption.

- Under limited circumstances in the performance of legitimate job function, such as client entertainment, CoStars may use alcohol in moderation with the consent and knowledge of their Department Head. In addition, occasionally, alcohol is served at social events sponsored by the Company. Only the moderate and limited use of alcohol is acceptable. CoStars are expected to remain responsible, professional, and sober at all times.
- CoStars can stay in the resort as a registered guest. CoStars need to notify their Department Manager of their reservation. Reservations are granted on the business demand and must be in the appropriate form. At time of check in, CoStars, family or friends will be asked to provide discount authorization.
- Being in guest rooms is prohibited for those CoStars whose work does not include being in guest rooms unless as a registered guest.
- Due to limited capacity at our pools (including Marquee Day Club), the use and enjoyment of our Pool District is limited to hotel guests.
- CoStars will not be able to gamble at The Cosmopolitan of Las Vegas at any time, except the Race & Sports Book where gambling is allowed.

- CoStars are not eligible to join the Identity Membership or participate in other marketing programs or promotions.

Family Members or cohabitants of CoStars may gamble at The Cosmopolitan within the following guidelines:

- Family members or cohabitants of Table Games Department CoStars may not play within the table games area where the CoStar is working.
- Family members or cohabitants of Slot Department CoStars may not play slots in the station area where the CoStar is working.
- “Family Member” is defined as mother, father, spouse, sister, brother, children, grandparents, mother-in-law, father-in-law, stepparents, step-grandparents, grandparents by marriage and grandchildren.
- Certain key CoStars and Gaming license holders are not permitted to gamble at the property and this extends to their immediate family. Immediate family includes parents, siblings and children.

Responsible Gaming

The Cosmopolitan of Las Vegas supports responsible gaming practices and complies with the Nevada Council on Problem Gambling code of conduct. Our Company is committed to:

- Respecting our guests and providing assistance to the guest who may be experiencing problems;
- Conducting staff training that stresses the importance of responsible gaming;
- Promoting responsible gambling policies, practices and procedures within the gaming industry; and
- Promoting the National Council on Problem Gambling hotline (1-800-522-4700).

Your Supervisor will notify you about responsible gaming training classes that may be required for your position.

Underage Gaming

All CoStars are responsible for the prevention of underage gambling or loitering by minors in the casino and bar areas. The legal age for gambling in Nevada is 21 years old. Minors are not permitted to gamble or patronize any gaming area. In addition, minors are not permitted to loiter or be employed in the casino area. Minors are permitted to pass through the casino area on the walkways only.

CoStars are to alert the nearest Supervisor, Manager or Security Officer if you witness any guest who appears to be under the age of 21 in the gaming areas. The Manager or Security Officer will ask for identification from those guests.

Any CoStar who witnesses a guest in the gaming areas who appears to be under the age of 30 years must ask for identification.

Please see your department for specific procedures regarding this policy.

Report Arrests

Let your Supervisor and the People Department know right away if you are arrested or subpoenaed for any reason.

Parking

Please park in the designated CoStar parking area/lot only. Follow Security's instructions at all times. Parking in unauthorized areas may result in having your vehicle immobilized, receiving a fine and/or disciplinary action.

It is also important to observe traffic signs and speed limits as well as pedestrian right of way rules in and around the parking garage and lot. Remove any valuables, lock your car and take all safety precautions when walking to and from your car. The Cosmopolitan of Las Vegas is not responsible for any theft or vehicle damage.

Contact Information

It is required that you always keep your contact information updated. Log on to your Self Serve account to change your address, telephone number, and emergency contact.

Employment of Relatives and Cohabitants

To avoid the appearance of impropriety or favoritism in our workplace, we limit the employment of CoStars who are related by blood or marriage, living with, or having non-platonic relationships with other CoStars. To preserve ethical and productive operations, CoStars who are related by blood or marriage, living together or involved in a non-platonic relationship, are generally not allowed to work together. All CoStars must disclose all CoStars who are related by blood or marriage. It is prohibited for there to be a direct or indirect reporting relationship for a CoStar who is related to by blood or marriage, living with, or having non-platonic relationships with other CoStar.

CoStars in Surveillance, People, Security, Internal Audit, Directors & above may not be related to by blood or marriage, living with or are having non-platonic relationships with other CoStars. If your relationship with another CoStar falls into one of the above categories in any way, you are responsible for advising the People Department of your situation.

The Company reserves the right to determine whether a relationship between two CoStars violates this policy and to take action. Options include transferring a CoStar, reassigning tasks, initiating a leave of absence and other measures to reduce the possibility of potential conflict.

Smoking

The Cosmopolitan of Las Vegas is a smoke free work environment in compliance with the Nevada Clean Indoor Act.

Smoking is permitted during scheduled breaks in the designated area only. The outdoor smoking area is clearly indicated by signs and ashtrays are provided so cigarettes can be properly disposed.

You are not permitted to smoke in the following areas during your shift or breaks:

- Any area designated by the Nevada Clean Indoor Act as non-smoking
- Any outdoor area of the resort that is visible to guests, for example, the main entrance
- Any area outdoors not designated as a smoking area; for example, receiving docks
- Casino Floor
- Guest Parking Garage
- In Company vehicles

Smoking in any unauthorized area will result in disciplinary action up to and including termination.

Harassment-Free Workplace

The Cosmopolitan of Las Vegas is committed to providing a working environment free from harassment. We expressly prohibit any form of harassment based on race, color, religion, sex, pregnancy, national origin, age, disability, sexual orientation or any other category or status protected by federal, state, and local law.

The Cosmopolitan of Las Vegas will not tolerate the usage of epithets, slurs, jokes, negative stereotyping, threats or intimidation or any similar verbal or physical conduct that denigrates or shows hostility or aversion towards an individual because of his/her race, color, religion, sex, pregnancy, national origin, age, disability, sexual orientation, gender orientation or expression or any other category or status protected by federal, state, and local law.

Harassing conduct also includes display or circulation (including through e-mail) in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

Sexual harassment is also expressly prohibited. Sexual harassment includes any unwelcome or unwanted conduct of a sexual nature (verbal or physical) when: (1) submission to such conduct is made a term or condition of a person's employment, either explicitly or implicitly; (2) submission to or rejection of this conduct by an individual is used as a factor in decisions affecting hiring, evaluation, and promotion or other aspects of employment; or (3) the conduct has the purpose or effect of substantially interfering with an individual's employment or creates an intimidating, hostile or offensive work environment.

This policy applies to all CoStars of The Cosmopolitan of Las Vegas. Sexual harassment is inappropriate and contrary to The Cosmopolitan of Las Vegas' policies whether it involves CoStar harassment, harassment by a Supervisor or manager, or harassment by persons doing business with or for The Cosmopolitan of Las Vegas (vendors, suppliers, guests, etc.).

Examples of unacceptable conduct include, but are not limited to:

- Threats or promises of benefits in exchange for sexual favors or implying that things will go smoothly in exchange for sexual favors;
- Unwelcome or unwanted sexual jokes, flirtations, propositions or obscene comments or gestures;
- Unwelcome or unwanted sexual advances; making or threatening reprisals after a negative response to sexual advances, negative stereotyping based upon one's gender;
- Graphic or verbal commentary or abuse about an individual's body, dress, sexual prowess, sexual deficiencies, or of any sexual nature or the use of sexually degrading words to describe an individual, suggestive or abusive letters, notes, messages or invitations, unwanted or suggestive leering, whistling, pinching, insults;
- Unwelcome, unwanted or suggestive touching, or impeding or blocking movements; or
- The display of circulation in the workplace of sexually suggestive words, jokes, objects, posters, cartoons, or pictures (including through e-mail), including rude or sexually suggestive photographs.

These types of behavior are unacceptable in all work settings, such as business trips, and at business related social events. All CoStars of The Cosmopolitan of Las Vegas and particularly managers have a responsibility for keeping the environment free of harassment.

Any incident or situation that you believe involves prohibited discrimination or harassment, sexual or otherwise, by any CoStar or individual under the Company's control or on our property, should be reported immediately so the Company may take corrective action.

A report of discrimination or harassment should be made in person or in writing to your immediate Supervisor or manager. If you conclude or otherwise feel that reporting it to your immediate Supervisor is not appropriate or comfortable, you may report it to the Vice President of People, the Talent Engagement Manager or the AlertLine.

If you conclude or otherwise feel that reporting it to the People Talent Engagement Department is not appropriate or comfortable you may report it to the Vice President of your department. It is also recommended, but not required, that you firmly and promptly notify the offender that his or her behavior is unwelcome. Any Supervisor or manager who becomes aware of any possible discrimination or harassment should immediately advise the Vice President of People Department or Talent Engagement Manager.

If a CoStar makes the Company aware of a complaint of discrimination or harassment, the Company is obligated by law to investigate and, if appropriate, take prompt action.

For this reason, if a complaint of discrimination or harassment is brought to the Company's attention, the Company will investigate, regardless of whether the complaining CoStar wants the Company to do so. The Cosmopolitan of Las Vegas will promptly and thoroughly investigate the facts and circumstances of any claim of discrimination or harassment and will do its best to maintain the confidentiality of the complaint and complaining CoStar to the extent practical and appropriate under the circumstances. CoStars at any level who engage in harassment or discrimination will be subject to severe disciplinary action, up to and including termination.

It is The Cosmopolitan of Las Vegas policy to strictly prohibit any form of discipline or retaliation for reporting any incident or situation of discrimination or harassment, pursuing any claim of discrimination or harassment or otherwise participating or cooperating in any investigation of a complaint of discrimination or harassment.

Drug Free Workplace

CoStars performing their jobs under the influence of alcohol or illegal drugs risk the health and safety of everyone in our workplace. To protect the safety and health of all CoStars, we have established the following policy regarding alcohol and illegal drugs at work. For this policy, "illegal drug" is defined as any substance that is illegal to sell, use or possess.

We absolutely prohibit the sale, purchase, distribution, or possession of any alcoholic beverage and/or non-prescribed drugs during work hours or on Company property, in Company-owned vehicles or vehicles used for business purposes, and at any time or location where Company business is conducted or the CoStar is representing the Company. Taking legally prescribed medications or over-the-counter medications are permitted if use of such medications does not adversely affect job performance or safety.

If you are using prescription or over-the-counter medications that may impair your ability to perform your job safely, you must report the use to your Supervisor or the People Department before working. If you discover that such medication impairs your ability to work, immediately stop working and report your condition to your Supervisor. Consult with your physician if you are impaired or affected by prescription or over-the-counter medications.

Our efforts to maintain a safe, productive, substance abuse-free workplace may include inspecting and opening CoStar offices, desks, drawers, lockers, garment bags, clothing, and personal vehicles on Company property, packages, handbags, lunch boxes, containers, and articles in such areas. We also reserve the right to inspect any object that might conceal alcohol, illegal drugs or other inappropriate materials.

Any CoStar who does not consent to and fully cooperate with such inspections may be subject to disciplinary action up to and including termination.

Alcohol and Drug Testing

We require a pre-employment drug test for all individuals who accept an offer of employment. Additionally, we may require alcohol and/or drug testing in the following circumstances:

- If a reasonable suspicion exists that a CoStar is under the influence of any controlled substance, drug or alcohol while on the job, in the workplace or at a guest site;
- When an accident, near-miss or incident occurs in which safety rules or precautions are violated or careless acts are performed and a reasonable suspicion exists that the CoStar may be “under the influence” at the time;
- When an automobile accident occurs involving a CoStar driving a Company vehicle or while on Company business—regardless of who is at fault and the level of absence of any damage or injury; or
- Any work-related accident that occurs and requires medical attention for the CoStar(s) involved.

If an alcohol or drug test result is positive, the CoStar will be immediately terminated.

A CoStar's refusal to submit to testing when a reasonable suspicion exists will be handled in the same manner as a positive test.

NOTE: In the case of work-related injury where a CoStar has tested positive for alcohol or illegal drugs, Workers' Compensation benefits may be denied.

Workplace Violence

Workplace violence is any act of physical violence, threats of physical violence, harassment, intimidation, or other threatening disruptive behavior. Acts of violence are prohibited in the workplace, while engaged in business on behalf of the Company off-property, while operating any vehicle or equipment owned or leased by the Company or while in uniform on or off duty. CoStars who experience, observe or become aware of acts of violence should move to a position or area of safety and immediately report the incident to Security.

Business Use of Social Media

The following rules apply only to business use of social media on behalf of The Cosmopolitan. Nothing in this section is meant to limit activity protected by law, such as discussing terms and conditions of employment.

There are many potentially beneficial business uses of social media, including customer, competitor, and industry research; marketing and customer development; networking; and knowledge building.

CoStars who use social media for business purposes are to always conduct themselves in a professional manner according to this policy and other applicable Company policies and procedures, including but not limited to the Company's Standards of Conduct; Code of Business Conduct and Ethics; Anti Harassment and Discrimination; Computer, Internet, Intranet, and E-Mail Use; and Computer Access and Use Agreement policies.

Additionally, if you are unsure as to whether or not a particular social media activity is appropriate you must consult with your department manager, Public Relations and Director of Web and Social Media before participating.

If you participate in social media for business purposes on behalf of The Cosmopolitan, please follow these guidelines:

1. You should not represent yourself as the official spokesperson of the Company or suggest that you represent the Company's position unless specifically authorized to do so in writing by Public Relations and Director of Web and Social Media. This includes creating social media accounts that represent the Company on any of the social media services listed above in the SCOPE section of this policy.
2. Use your real name, identify that you work for the Company and be clear about your role.
3. If, as part of your work, you are writing about a topic that the Company is involved with but you are not the expert on the topic, you should make this clear to your readers, use a disclaimer such as: "The postings on this site are my own and don't necessarily represent the Company's positions, strategies, or opinions."
4. Write in the first person (i.e. I believe rather than we believe.)
5. Make sure your efforts to be transparent do not violate the Company's privacy, confidentiality, and legal guidelines for external commercial speech. All statements must be true and not misleading, and all claims must be substantiated and approved. Please never comment on any of the following:
 - a. Anything related to legal matters
 - b. Financials
 - c. Litigation
 - d. Anything about competitors and their capabilities
 - e. Customers, CoStars, business partners, service providers and suppliers.
6. Respect brand, trademark, copyright, fair use, trade secrets (including our processes and methodologies), confidentiality, and financial disclosure laws. If you have any questions about these, contact your Manager, Public Relations and Director of Web and Social Media.
7. Others' posts or comments relating to the quality of any of the Company's facilities, service, food, entertainment, etc. that you feel action is warranted because the post is either extremely favorable or extremely unfavorable, should be referred to the Public Relations Department and the Company's Social Media team rather than initiating "posts" or comments.

8. Any audio, video or photographic images taken of the Company should not be posted unless specifically authorized to do so in writing by the Public Relations Department.
9. Identify any copyrighted or borrowed material with citations and links rather than claiming authorship. When publishing any authorized materials online through social media that include someone else's direct or paraphrased quotes, thoughts, ideas, photos, or videos, always use citations and links to the original material where applicable. All material, regardless of its sources, must be evaluated and approved for appropriateness prior to posting by your manager or Public Relations.
10. Always be respectful when referring to the Company's customers, CoStars, business partners, service providers and vendors, including their privacy. This applies to both the type of information posted and the manner and context in which it is presented. Do not identify such individuals by name, post their pictures or provide other specific information without securing their approval.
11. Obey the law. Do not post any information or engage in any online conduct that may violate applicable local, state or federal laws or regulations.
12. Nothing in this section is meant to limit activity protected by law.

Personal Use of Social Media

The Company respects the rights of CoStars to use social media as a means of personal self-expression and conversation and does not want to discourage such self-expression and discussion. The Cosmopolitan respects CoStars' right to express their personal opinions when using social media and nothing in this prohibition proscribes CoStars from expressing their opinions about The Cosmopolitan's policies, The Cosmopolitan's treatment of CoStars, or terms and conditions of their employment.

Your personal and business online personas are likely to intersect, so it is important to remember that customers, colleagues and management often have access to the online content you post. Keep this in mind, when publishing information online that can be seen by more than friends and family, and know that information originally intended just for friends and family can be forwarded on. Remember NEVER to disclose confidential and proprietary information of The Cosmopolitan such as trade secrets; private information about customers, service providers and suppliers; company financial information; non-public operational procedures and techniques that have a commercial value; strategic business plans; client lists; and price sheets. This prohibition does not proscribe CoStars from disclosing and sharing information relating to their wages and other terms and conditions of their employment.

The Company does not discriminate against CoStars who use these mediums for personal interests or other lawful purposes, including the discussion of terms and conditions of employment.

Social media sites have nearly unlimited communication potential, duration and retention, and generally can be accessed by anyone around the world. Thus, to protect the Company's legitimate business interests, CoStars who maintain or contribute to social media sites are prohibited from engaging in the following activities:

1. Using the Company's facilities and equipment, including computers and software during working time to engage in personal social media activities in a manner that is inconsistent with the Company's Computer, Internet, Intranet, and E-Mail Use policy and Computer Access and Use Agreement.
2. Posting social media content that states you represent the position, viewpoint, statements, opinions or conclusions of the Company its business partners, service providers or vendors. This includes posting Company announcements and other information prior to the Company issuing the information through the Company's social media channels and/or through media outlets (newspapers, magazines, blogs, etc.).
 - a. Managers and executives should take special note that by virtue of their position they must consider whether the personal thoughts they choose to publish may be misunderstood as expressing the Company's positions.
3. Using social media to post intellectual property, trademarks logos, or copyrighted materials owned by the Company or any business partners, service providers or vendors, unless such activity is otherwise protected by law such as in the course of discussing your terms and conditions of employment.
4. Posting Company trade secrets, proprietary or other confidential business information, including but not limited to private information about the Company's customers, service providers and suppliers, company financial information, non-public operational procedures and techniques that have a commercial value and strategic business plans.
5. Posting advertisements for the purchase of the Company's products or services.
6. Linking a social media forum to any Company internal or external web site, broadcast domain or computer network.
7. Using photographs, recordings, marketing materials, or other materials owned by the Company for personal social media activities, unless such activity is otherwise protected by law, such as if used as part of a discussion about your terms and conditions of employment.
8. Using social media to threaten physical violence against the Company's customers, CoStars, business partners, service providers and vendors or to harass such individuals, based on their color, race, national origin, religious beliefs or practices, gender, actual or perceived sexual orientation, age, disability or perceived disability, gender identity/expression, marital/partnership status, parental status or military service.
9. Using social media to engage in obscene, violent, or maliciously false behavior directed at or implicating the Company, its customers, CoStars, business partners, service providers.

These limitations are not intended to infringe upon any rights CoStars may have under local, state and federal laws, including the National Labor Relations Act, which allows for discussion of terms and conditions of employment, including about an employer's treatment of an employee.

CoStars in violation of this policy will be subject to disciplinary action up to and including termination. In addition, the Company reserves the right to take any appropriate legal action necessary to stop or remedy violations.

This policy may be updated at any time without notice, and each time a CoStar accesses a social networking site, the new policy will govern usage effective upon posting.

CoStar Guidebook Index:

TOPIC	PAGE NUMBER
401(k)	Page 11
Additional Insurance Coverage	Page 10
Alcohol and Drug Testing	Page 33
AlertLine	Page 18
Attendance	Page 18
At-Will Employment	Page 5
Beards	Page 21
Benefit Enrollment	Page 11
Benefits	Page 9
Bereavement	Page 13
Breaks	Page 22
Business Use of Social Media	Page 33
Cell Phones and Beepers	Page 22
Communication	Page 11
Company and Personal Property	Page 26
Confidentiality	Page 25
Conflict of Interest	Page 23
Contact Information	Page 29
Continuation of Benefits COBRA	Page 11
CoStar Classifications	Page 6
CoStar Relations	Page 18
CoStar Style	Page 7
Counseling Notices	Page 23
Dental Plan	Page 10
Direct Deposit	Page 8
Diversity	Page 5
Drug Free Workplace	Page 32
Education Assistance	Page 12
Employment of Relatives and Cohabitant	Page 29
Entering the Resort	Page 24
Equal Employment Opportunity	Page 5
Eyewear	Page 21
Fingernails	Page 21
Footwear	Page 22
Fragrances	Page 22
Gaming Registration	Page 24
Grooming and Appearance	Page 19
Guest & Celebrity Treatment	Page 25
Hair	Page 20
Harassment-Free Workplace	Page 30
Hygiene	Page 21
ID Badges	Page 24
Introductory Period	Page 5

CoStar Guidebook Index:

TOPIC	PAGE NUMBER
Jewelry	Page 21
Job Opportunities	Page 6
Jury Duty	Page 14
Learning and Development	Page 6
Leave of Absences	Page 13
Life Insurance	Page 10
Lost and Found	Page 27
Make-up	Page 22
Meals	Page 7
Media & Press	Page 25
Medical Leave	Page 14
Medical Plan	Page 10
Military Leave	Page 14
Mustaches	Page 20
Non-Uniformed CoStars	Page 19
Outside Employment	Page 24
Overtime	Page 9
Paid Time Off (PTO)	Page 12
Parking	Page 29
Pay Periods	Page 8
Paycard	Page 9
Personal Leave	Page 14
Personal Phone Calls, Cell Phones, and Blackberries	Page 22
Personal Use of Social Media	Page 35
Prescription Drugs	Page 10
Problem Solving (Conflict Resolution)	Page 17
Recognition	Page 7
Report Arrests	Page 29
Responsible Gaming	Page 28
Self Serve	Page 12
Smoking	Page 30
Solicitation and Distribution	Page 26
Standards of Conduct	Page 15
Tags	Page 22
Tattoos	Page 21
The Cosmopolitan of Las Vegas Peer Review	Page 17
Time Keeping	Page 8
Tip Compliance	Page 9
Underage Gaming	Page 28
Uniformed CoStars General Guidelines	Page 20
Use of Facilities	Page 27
Vision Care	Page 10
Work Areas	Page 26

CoStar Guidebook Index:

TOPIC	PAGE NUMBER
Work Cards	Page 23
Work Hours	Page 8
Work Related Illness & Injury	Page 15
Workplace Violence	Page 33