

Boyd works diligently to create an environment free of harassment and discrimination – where all individuals are treated with respect and dignity. We want all individuals that work at Boyd to feel valued for their differences and contributions. We believe that celebrating diversity and inclusiveness enables us to become a more effective organization and to achieve our vision of creating unmatched value for our customers, colleagues and shareholders.

A culture that values diversity and inclusion can be permanently damaged by acts of harassment, discrimination and retaliation. These types of actions not only negatively impact the victim, but also those that witness them. Boyd will not tolerate these acts and behaviors and will take swift action to ensure that these issues are addressed.

Building a diverse and inclusive environment requires deliberate and sustained efforts by each of us. All individuals that perform work on behalf of Boyd are responsible for implementing this policy in their day-to-day work and in their dealings with colleagues and customers, as well as required to report any concerns in regard to other individual's conduct. Boyd Managers and Supervisors have additional responsibilities, which include the following:

- Establishing and maintaining this culture within their own teams, including getting to know their team members and setting the tone for how those on the team will treat each other.
- Implementing this Policy as part of their day-to-day management.
- Applying policies and practices in a fair and equitable way.
- Recognizing unacceptable behavior and take immediate appropriate action to address any such behavior.

Any leader who knowingly permits these behaviors to occur or who fails to report allegations to Human Resources will be subject to discipline, up to and including termination.

This policy applies to all employees, applicants, consultants, agents, representatives, contractors and contract workers ("Colleagues") that perform work on behalf of Boyd.

DIVERSITY

Diversity is an essential element of any great organization. Boyd values diversity as an important asset that enhances our culture, helps us serve clients well and maximizes return for shareholders. Boyd embraces and supports the differences and characteristics that make our Colleagues unique.

For us to excel, we must establish and maintain an inclusive environment that seeks out, welcomes and supports differences and encourages input from all perspectives.

By having Colleagues with diverse backgrounds and perspectives within our organization, we are able to gain insight, find faster and more effective solutions to challenging problems and innovate at a higher level. Each of us has a responsibility to promote diversity and bring experiences from our own backgrounds to make Boyd stronger.

INCLUSION

Inclusion is a behavior that makes people feel welcome. In an inclusive culture, Colleagues feel like they can be themselves and that their unique talents and perspectives are appreciated. When they feel valued and understood, they are more engaged, innovative, productive and want to stay with Boyd for the long-term.

Below are some examples of inclusive behavior:

- Getting ideas from others on how to solve a problem.
- Listening when others give suggestions.
- Discussing, not arguing.
- Using respectful words and tone.
- Ensuring meeting times take into account a global team.
- Recognizing Colleagues for great work.

Each of us want to feel accepted and valued at work. We have a duty to make others feel the same.

EQUAL OPPORTUNITY

Boyd believes in equal employment opportunities for all qualified persons without regard to any impermissible criterion or circumstance. All decisions for hiring, promoting, developing, training, and establishing compensation and benefits for Colleagues are made by using objective standards based solely on the relevant qualifications, skills and qualities the individual would bring to the position with the Company.

HARASSMENT

Boyd will not tolerate workplace discrimination, bullying or harassment in any form by anyone who works for or with us in any capacity. This type of behavior is illegal and may subject Boyd and responsible individuals to liability and possible criminal charges. Harassment by Colleagues, suppliers, subcontractors or other individuals while on Boyd property or at Boyd events is strictly forbidden.

Harassment includes, but is not limited to, the following forms:

- **Discriminatory Harassment:** Discriminatory harassment is verbal, non-verbal or physical conduct that denigrates or shows hostility toward an individual or their family because of their race, ethnicity, national origin or ancestry, genetic information, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, pregnancy, citizenship, veteran status, or any other characteristic protected by law and that has the purpose or effect of creating an intimidating, hostile or offensive work environment, or otherwise adversely affects an individual's work performance or employment opportunities. Below are some representative examples of discriminatory harassment, which is not intended to be an exhaustive list:
 - Any prejudice or racist behavior.
 - Referencing racial, ethnic or religious stereotypes.

- Making, displaying or sharing derogatory comments, letters, notes, emails, texts, videos, pictures, insults, jokes, social media posts or objects related to one or more of the above protected characteristics.
 - Taunting, bullying, intimidation, direct insults, and physical contact such as assault or blocking normal movement.
 - Treating individuals differently in any way because of one or more of the above protected characteristics.
 - Failing or refusing to hire someone or denial of training opportunities, transfers and promotions.
 - Being terminated or having shifts reduced.
 - Not being paid the same as someone doing the same job with the same experience and qualifications.
- **Workplace Bullying:** Workplace bullying is mistreatment from others in the workplace that causes either physical or emotional harm. Examples may include, but are not limited to the following:
 - Verbal, non-verbal or electronic ridiculing, abusing, slandering, or maligning an individual or their family.
 - Persistent name calling that is insulting, humiliating or hurtful.
 - Using an individual as a focal point of jokes.
 - Threatening gestures or glances which can convey threatening messages.
 - Taunting, bullying, intimidation, direct insults, and physical contact such as assault or blocking normal movement.
 - Exclusive actions, such as intentionally excluding or disregarding an individual in work-related activities.
- **Sexual Harassment:** Offensive behavior that is sexual in nature, which includes unwelcome sexual advances or propositions, requests for sexual favors and other statements or actions of a sexual or gender-based nature when the harasser threatens terms of employment, interferes with a Colleagues' performance or creates an intimidating, hostile or offensive work environment. Examples of this inappropriate behavior include, but are not limited to the following:
 - Verbal: Making sexual or suggestive comments or questions about personal sexual matters; insults, threats or jokes about an individual's personal or physical traits or clothing; jokes of a sexual nature (including innuendos); sexual propositions, threats and requests for sexual favors (including repeated, unwelcome requests to spend time outside of work) or other sexually suggestive, derogatory or obscene remarks.
 - Non-Verbal or Electronic: Whistling or making inappropriate sexual sounds; leering or making sexual or obscene gestures; or the sending or use of letters, notes, literature, emails, texts, videos, pictures, jokes, social media posts, or other objects which are sexually suggestive, revealing, demeaning or pornographic.
 - Physical: Inappropriate touching, pinching, rubbing, messaging or other physical contact; impeding or blocking normal movement; coercing sexual relations; or assault.

DISCLOSURE

Certain relationships may impact our ability to enforce this policy, or may pose issues of nepotism and/or conflicts of interest. Colleagues who enter into a consensual, romantic and/or sexual relationship with a subordinate or a supervisor (regardless of the number of management layers between them) must notify Human Resources immediately. Also, Human Resources must be notified when Colleagues' consensual relationship has the same manager or when at least one of the Colleagues in the relationship has influence or control over the employment of the other individual.

RETALIATION

Boyd will not tolerate retaliation against an individual who has reported an incident in good faith or who has participated in an investigation of a harassment or discrimination complaint. Any individual that makes a complaint that is found to be intentionally false, may be subject to discipline, up to and including termination.

REPORTING

Discrimination, bullying, harassment and retaliation pose a serious risk to our company culture and our business. If an individual is being or has witnessed such inappropriate behavior, concerns should be immediately reported to one the below:

- The Colleagues' Supervisor or Manager
- Human Resources
- Legal and Compliance Department
- Company President and Chief Executive Officer
- Any Other Boyd Leader
- Ethics Hotline: Reports can be made anonymously and in the language of choice:
 - **United States:** +1 (844) 990-0400
 - **Outside of the United States:** Go to www.lighthouse-services.com/boydcorp to find a local tollfree phone number.
 - **Submit Online:** Go to www.lighthouse-services.com/boydcorp.

We take all allegations seriously and will investigate promptly and thoroughly. All Colleagues are required to fully participate and cooperate in any investigation. Throughout the course of the investigation, we will maintain confidentiality as much as reasonably possible and related information will only be shared with those that need to know.

If it is concluded that inappropriate behavior occurred, disciplinary action, up to and including termination, will be taken to correct the situation. If the complaint cannot be substantiated, Boyd will take actions to reinforce its commitment to providing a work environment free from harassment, discrimination and retaliation.

In addition to Boyd's internal reporting process, Colleagues may also file a complaint with the Equal Employment Opportunity Commission (EEOC) and/or the applicable state agency.