

MARKETING AND  
ADVERTISING CODE

JANUARY 2013

Caesars Entertainment Corporation

# Marketing and Advertising Code

## INTRODUCTION

Each year, millions of responsible adults enjoy the excitement of gambling at properties owned, operated or managed by Caesars Entertainment Corporation. Our guests are encouraged to treat gambling the same way they treat other forms of recreation: to budget the time and amount of money they want to spend, and to consider their chosen recreation as a pleasant pastime. We are proud that we entertain millions of guests each year. They overwhelmingly tell us that they are entertained by engaging in gambling with us whether they win or lose or even just enjoying our non-gambling entertainment options on any particular occasion.

Promoting responsible gambling is part of our culture at Caesars. Our long-standing position has been that if a guest gambles with us for any reason other than the fun of it, that customer is playing for the wrong reason. Many observers have lauded our company's industry-leading programs and practices in combating problem gambling. The advertising and marketing of our activities must be sensitive to these issues.

Caesars also provides a wide array of non-gambling entertainment options to its customers, both at our properties (such as dining, spas, shows and concerts), and online or through mobile or Internet based play-for-fun and social game applications. Social games are games that may be played for free with a fun and entertaining focus to unlock new content within the game. They may or may not have themes related to traditional casino games. Play-for-fun games are games simulating gaming activities without wagering, but they have an educational focus and guests may receive marketing materials related to gambling.

All of our advertising, for all of our products and services, must be truthful and consistent with generally accepted standards of good taste.

In order to codify our commitment to the principals of responsible gambling, Caesars has adopted this marketing and advertising code (the "Code").

## SCOPE

1. The Code applies to the marketing and advertising of all Caesars Entertainment Corporation subsidiaries, and its brands that are utilized by its subsidiaries. It also applies to all of the Caesars brands, including but

not limited to, Caesars, Horseshoe, Harrah's, World Series of Poker and Total Rewards.

2. Advertising is not considered "gambling advertising" solely by virtue of the inclusion of a gaming or property brand or logo in a given advertisement or marketing material.
3. The Code applies to every media or channel for marketing and/or advertising, including, but not limited to, direct mail, email or SMS messaging, outdoor, on property, radio, television, film, mobile devices, print, social gaming, and the Internet.
4. The Code does not apply to content designed specifically to address the issues of underage or problem gambling. The Code also does not apply to the Caesars Foundation, Code Green, HERO, or Caesars Entertainment communications (absent the use of any logos of Caesars gaming brands including but not limited to its casino property logos), Caesars owned or operated golf courses and/or the Mid-America Center in Council Bluffs, Iowa.
5. Caesars complies with all applicable local, state and federal laws and regulations ("Laws") regarding marketing and advertising. These Laws may include limitations, restrictions, or other provisions that are different from those identified in the Code. In such cases, the more stringent of the Laws and/or the Code would apply.

## CONTENT

6. Advertising and marketing materials shall portray all of Caesars' activities and services, as well as guests experiencing such activities and services, in a responsible manner. Advertising and marketing materials for gambling activities are designed and intended for those of legal age (in their jurisdiction) to gamble who choose to play gambling games.
7. Advertising and marketing materials are consistent with contemporary local standards of decorum and decency. They do not use images, language(s) or tones which discriminate against or degrade any class of people, faith, or religion, underrepresented or non-traditional groups of individuals. This includes individuals of any age, gender, physical or mental ability, race, ethnicity, color, creed, national origin, sexual orientation and gender identity or expression.

# Marketing and Advertising Code

8. Advertising and marketing materials do not depict, encourage, or condone excessive, irresponsible, or illegal activity. Furthermore, they do not:
  - 8.1 State or imply that any of our activities or services is an acceptable means of satisfying work or family commitments, or an alternative to work or family commitments;
  - 8.2 State or imply that any of our activities or services is necessary for financial, physical, emotional or social success;
  - 8.3 State or imply that any of our activities or services solves personal problems;
  - 8.4 Portray individuals who are intoxicated, who are compelled to gamble, who have lost control of their faculties, or who have become separated from reality; or
  - 8.5 Suggest in any way that excessive, irresponsible or illegal use of our services or activities is amusing or acceptable behavior.
9. We advertise and market gambling activities and/or play for fun services directly via telephone, mobile devices, email, or postal mail only to adults of legal age to gamble in their jurisdiction. Our advertisements for our non-gambling and social games services and amenities directly via telephone, mobile devices, email or postal mail are intended only for adults, age 18 or over, with the exception of venues that require a different legal age to engage in the activity. Our marketing and advertising materials do not:
  - 9.1 Show gambling being experienced by anyone under the legal age to gamble;
  - 9.2 Use actors in advertising relating to gambling who are below 25 years of age or who reasonably appear to be below the legal age to gamble in their jurisdiction. This restriction shall not apply in real live footage, such as poker events or in the use of “celebrity” poker players, in which case all individuals shown must be of the legal age to gamble in their jurisdiction.
  - 9.3 Use any symbol, language, gesture, cartoon, music, animated character, entertainment figure, or child’s toy in our advertisement or marketing that has primary appeal to persons below the legal age to gamble in their jurisdiction. Material has a “primary appeal” to persons below the legal age to gamble in a casino if it has special attractiveness to such persons above and beyond the general attractiveness it has for persons above the legal age to gamble in their jurisdiction.
  - 9.4 Show or imply that any of our activities or services is a “rite of passage” or otherwise necessary for the attainment of adulthood.
10. Advertising and marketing materials shall depict our casinos and other businesses as respectable and well-kept establishments.
11. We do not market gambling materials or content to social games customers unless we have verified that they are of the legal age to gamble in their jurisdiction.
12. All print gambling advertising includes a message offering a toll-free helpline for individuals who might have a gambling problem. The minimum requirements for the message are subject to the local jurisdictional rules.
13. We sponsor public awareness, education, and other campaigns on problem and underage gambling.

## PLACEMENT

14. We do not promote gambling or play for fun activity at any event where the majority of the audience is reasonably expected to be below the legal age to gamble in their jurisdiction nor do we promote our brands or non-gambling amenities and/or social games at events where the majority of the audience is reasonably expected to be below 18. Notwithstanding such prohibition, we may advertise and/or market at or near facilities that are used primarily for adult-oriented events, but which occasionally may be used for an event where most attendees are under the legal age to gamble in a casino, e.g., an arena or stadium.
15. No Caesars’ gaming brand, logo, trademark, or service mark is to be used or licensed for use on clothing, toys, game equipment, or other materials that are intended primarily for persons below the legal age to gamble in their jurisdiction. Materials that are intended primarily for persons below the legal age to gamble in their jurisdiction, regardless of the presence of any product name, logo, trademark, or service mark, are not used as

# Marketing and Advertising Code

promotional materials or given away at events, except in response to a charitable request. Material is intended to be distributed primarily to persons below the legal age to gamble in a casino if it has special attractiveness to such persons above and beyond the general attractiveness it has for persons above the legal age to gamble in their jurisdiction.

16. Advertising and marketing materials for gambling or play-for-fun activity are not placed in magazines, newspapers, television programs, radio programs, or other media where more than 30 percent of the audience is reasonably expected to be below 21 and/or the legal age to gamble in a casino in the applicable jurisdiction. Advertising and marketing materials for non-gambling amenities, including social games, are not placed in magazines, newspapers, television programs, radio programs, or other media where the majority of the audience is reasonably expected to be under the age of 18.
17. We do not advertise our products or brands in undergraduate college or university newspapers, with the exception of advertising for special events or venues that allow attendance for those 18 years and above. Advertisements elsewhere in undergraduate college or university media are in conformity with policies promulgated by appropriate college officials or with the prior approval of appropriate college officials.
18. We do not advertise our products, services or brands on the comic pages of newspapers or magazines.
19. New advertising of our products, services or brands is not placed on any outdoor stationary location within 500 feet of an established place of worship or an elementary school or secondary school. If existing advertising is within 500 feet of said locations, contracts for its placement will not be renewed.

19.1 For our websites that contain or advertise gambling or play-for-fun activities, we will:

- Post that the website is intended for individuals who are 21 and/or of legal age to gamble in a casino in the applicable jurisdiction.
- Include messages discouraging underage and irresponsible gambling.
- Include information about our responsible gambling philosophy, practices, and programs.

19.2 For our websites that offer online gambling, Caesars will require additional restrictions, such as age verification as required by any regulations in the applicable jurisdiction.

## COMPLIANCE AND DISSEMINATION

20. A copy of this Code is available at every property and on our internal website for employees, and is available to any outside party who might request it.
21. A Code Review Board (“Board”) composed of Caesars executives communicate at least annually and evaluates Code compliance. An annual written report outlining the extent of Code compliance and, if necessary, describing means to ensure greater Code compliance, is prepared for the Board, in order to ensure that advertisements are placed in compliance with the Code.
22. The Board also communicates when necessary to consider issues, complaints or suggestions about Caesars marketing or advertising materials lodged by any interested party. If clear, objective evidence demonstrates to the Board that any advertising or marketing material is in violation of the Code, the material in question will be withdrawn as soon as reasonably possible. All complaining parties shall be notified of the resolution of their complaints.

## EFFECTIVE DATE

23. The provisions of this Code apply to any marketing or advertising activity undertaken on or after January 1, 2013.

For more information on the Caesars Entertainment Marketing and Advertising Code, or on the Caesars Entertainment Code of Commitment contact:

Jan Jones

*Executive Vice President of Communications  
& Government Relations*

Caesars Entertainment Corporation  
One Caesars Palace Drive  
Las Vegas, NV 89109

