

STADIUM CASINO, LLC

Diversity and Inclusion Plan

April 30, 2019

Philadelphia

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DIVERSITY DEFINITIONS

Diversity refers to the variety of backgrounds and characteristics found in society today; thus it embraces all aspects of human similarities and differences. Diversity refers specifically to historically under-represented groups and differences with respect to age, culture, race, ethnicity, religion, color, disability, national origin, ancestry, sexual orientation and veteran's status. Business definitions of diversity are as follows:

DIS Disabled Business Enterprise

DIS are businesses that are at least 51% owned and controlled by a disabled individual.

DVET Disabled Veterans Business Enterprise

DVET are businesses that are at least 51% owned and controlled by one or more disabled veterans.

MBE Minority Owned Business Enterprise

MBE businesses are at least 51% owned and controlled by individuals belonging to certain ethnic minority groups. Ethnic minorities are United States citizens who are Asian, African American, Hispanic or Native American.

M/WBE Minority Women Owned Business Enterprise

M/WBE businesses are at least 51% owned and controlled by citizens belonging to certain minority groups and/or a person of female gender.

VET Veteran Owned Business Enterprise

VET businesses are at least 51% owned by individuals who are veterans of the U.S. Armed Forces.

WBE Women Owned Business Enterprise

WBE businesses are at least 51% owned and controlled by a person who is female in gender.

STATEMENT OF GOALS

To establish a diverse workforce by ensuring consistency, fairness and inclusion in the recruitment, selection and the career development process.

To promote diversity by ensuring equal opportunity in the procurement of contractors, sub-contractors, assignees, lessees, agents, vendors and suppliers.

To create an open and welcome atmosphere at all of our properties where employees, guests and vendors feel comfortable and welcome.

To actively seek out minority and women and other historically under-represented groups to provide opportunities for them to bid on providing services and/or supplies.

To be a strong financial supporter of a diverse number of worthwhile community charities and non-profit organizations through our community giving program.

DIVERSITY IN THE WORKPLACE

The four primary areas of diversity effectiveness are awareness, fairness, inclusion and leverage. Stadium Casino, LLC seeks to provide leadership in all of these areas of diversity and to encourage and support senior executives as they promote these goals in their areas of responsibility.

We encourage them to examine racial, ethnic, cultural, gender and age changes in both the local community and the workforce; to understand the importance and appreciation for people; examine stereotypes and prejudices and how they impact behavior and how to interact more effectively with people from all walks of life. We will also include examination of special needs, veterans and all historically under-represented groups.

The Human Resources and Legal departments will provide appropriate support and assistance but Stadium Casino, LLC looks to all of its senior executives to incorporate diversity into their areas of responsibility within our workforce. Absolute impartiality is required when recruiting, selecting and orienting new hires. The same is expected when considering candidates for pay reviews, further training and promotions.

RECRUITMENT

Stadium Casino, LLC is an Equal Opportunity Employer.

Our policy supports our company commitment to recruit, retain and develop a workforce that reflects both its local community and customer base. It contributes to a well-rounded workplace where differences are respected and appreciated.

In addition to traditional ways of seeking new candidates, we will undertake the following outreach strategies:

1. Stadium Casino will work with the African American Chamber of Commerce, the Hispanic Chamber of Greater Philadelphia, and the Asian American Chamber to create awareness of employment opportunities.
2. Development of close relationships with federal, state and local agencies and minority hiring programs to increase opportunities for minority applicants.
3. Regular monitoring by Human Resources to ensure that our diversity targets and benchmarks reflect our community. This includes tracking applicant flow by inserting a survey in the application process asking applicants to voluntarily indicate race/ethnic origin.
4. Cultivation of historically black colleges and universities to make them aware of the many career opportunities in gaming.
5. Attendance at job fairs in the Greater Philadelphia area, with an emphasis on those that target minorities and women.

Stadium Casino, LLC will also undertake the following outreach strategies to meet its targets for gaming service providers:

1. A review of Office of Economic Opportunity (OEO) Registry of Certified Firms by specialty for submission of bid documents for phases of the project.
2. Require the general contractor to identify local, qualified sub-contractors for project components.
3. Review of recent EOP development project reports to identify qualified contractors for comparable services.
4. Schedule project opportunity seminar with Philadelphia Area African American Chamber of Commerce, Greater Philadelphia Hispanic Chamber of Commerce, and the Philadelphia Asian American Chamber of Commerce.
5. Posting of contractor opportunities link on Cordish project website.
6. Coordinate Philadelphia resident building trades labor force initiative with the City's OEO Director.

SELECTION AND ORIENTATION

All Stadium Casino employees who are responsible for recruitment and selection will be educated in lawful employment making decisions.

We will ensure that all employment literature is clear and understandable including:

1. Website information available online at Livecasinohotelphilly.com
2. Any collateral including written tests that may be used.
3. Post hire paperwork
 - Employee Handbooks
 - 401 K and other Employee Benefit Information
 - Union Literature
 - Medical Health Information
4. Newsletters and companywide communications

TRAINING

Stadium Casino will conduct ongoing training for department heads and senior staff on the different training methods to reach diverse learning styles. We will ensure that training curriculum materials account for a diverse workforce that is inclusive and engaged. Multi- cultural appreciation is paramount to connecting with a diverse workforce.

EMPLOYEE RELATIONS

When possible Stadium Casino, LLC. will recognize and promote special dates, events and holidays such as:

- African American History Month
- Women's History Month
- Asian American Heritage Month
- Gay and Lesbian Pride Month
- Hispanic Heritage Month
- American Indian Heritage Month

We will also publicize such events in the company newsletter, message boards and the company's web pages.

1. Coordinate the special celebrations with the Food & Beverage department so appropriate celebratory meals will be available.
2. Host diversity focused events where employees can bring food from their culture to share with others.
3. Designate an area where employees can display artifacts or information about their cultures.

CAREER DEVELOPMENT

Our efforts in career development will include:

- Regularly perform a survey of all pay increases/promotions to measure the success of the diversity initiative.
- Track and review the pay increases/promotions within each department.
- Hold managers accountable for implementing the diversity plan in their respective departments.

DIVERSITY AND OUR GUESTS

Our goal is to market and advertise our company to create an inviting atmosphere at our properties where individuals of many diverse backgrounds feel comfortable.

1. Use our relationships in Multi-cultural organizations to support these organizations and promote diversity.
2. Food and Beverage initiatives.
3. Celebration of holidays and special events.
4. Research of the trends and expectations in emerging multicultural markets.

DIVERSITY IN BUSINESS PARTNERSHIPS

It is our intention to create an environment where there is equality of opportunity in all of our business partnerships. We will work with a diverse group of contractors, suppliers and other vendors, certified minority owned, women owned, disabled and small business enterprises to provide our company with goods and services. We will continue to hold vendor outreach events and create match-making sessions to mentor historically under-represented vendors.

We will encourage all of our partners to support diversity efforts through second tier supplier programs.

In turn the company will mentor disadvantaged businesses to help them develop.

Our executives are committed to attending trade shows and trade fairs as a way of meeting new potential partners and a web site will be created allowing for potential vendors to be included in the vendor database and receive information about procurement of goods and services.

Key diversity activities include:

- Review and improve our supplier diversity website for MBE, WBE and DBE online registration.
- Participate in construction meetings relating to the casino project at Livecasinohotelphilly.com to set the expectation for inclusion of minority and women owned businesses.
- Active participation in diversity focused trade shows, conferences and conventions such as the Minority Supplier Development Council, NAACP, Hispanic Chamber of Commerce, African American Chamber of Commerce, and Asian American Chamber of Commerce.

- Regular vendor meetings with our buyers to discuss enriching business partnerships through inclusion.
- Taking advantage of opportunities to mentor MBE, WBE businesses to include them in our supplier pipeline.

DIVERSITY AND COMMUNITY DEVELOPMENT DIRECTOR

The Director of Diversity and Community Development reports to the Chief Operating Officer and is responsible for the implementation, monitoring and enforcement of the Diversity and Inclusion Plan. These responsibilities include without limitation, recruitment, equal opportunity awareness training, workforce statistical analysis, grievance counseling and fact finding, career advancement counseling, assessment and adaptation of all personnel and compensation policies and procedures for conformity with agreed policies approved by any federal or state equal employment and business opportunity laws, monitoring and coordinating contracting and purchasing and construction activities and developing and maintaining involvement of the company in the community in support of equal employment and business opportunity.

The Director of Diversity and Community Development will continually communicate with Human Resources, Purchasing and Facilities and Construction departments to ensure that the objectives of the policy are being met. These departments will be required to submit reports of contracts awarded and contractor advertising for all levels of the workforce to demonstrate efforts made to comply. In addition, the Diversity and Community Development Director works closely with the Vice President of Human Resources to review employment practices to determine that all policies and procedures apply equally to all employees and all policies comply with our diversity initiatives.

The Director of Diversity and Community Development works with local stakeholders to keep them informed as to the value of the company and its impact on the community. The Director also serves as a member of the Responsible Gaming Committee focusing on underage and problem gaming prevention.

The Director of Diversity and Community Development will work closely with the American Gaming Association task force. The AGA is committed to promoting diversity in the commercial casino industry and accomplishes this commitment through a number of

initiatives that focus on hiring and procurement. The goal is to maximize participation on the human resource, purchasing and contracting subcommittees of AGA. The Director of Diversity and Community Development will coordinate Stadium Casino's participation in expos and fairs designed to give small suppliers and vendors the chance to showcase their products directly with purchasing decision makers.

The Director of Diversity and Community Development will direct the company's philanthropic donations of a local, regional and national nature.

PLAN MEASUREMENT AND EVALUATION

Evaluation is continuous with quarterly reports to the Pennsylvania Gaming Control Board on the key areas of plan performance. Periodic site visits and audits from the Pennsylvania Gaming Control Board's Chief Diversity Officer are an important part of external evaluation.

Internally, the Director of Diversity will provide ongoing assistance with evaluations and measurement of the plan's effectiveness. Other activities will include:

- Providing the CEO, COO with periodic audit reports of findings, including identifying accomplishments as well as any areas of improvement.
- Providing the Gaming Board with a report of our diversity results during each license renewal period.
- Recommending diversity programs and community projects.
- Advising the company's management team with respect to the effectiveness of the plan.