

DIVERSITY PLAN STATEMENT

SLOT MACHINE LICENSE APPLICANT NAME Vacation Charters Ltd.

SLOT MACHINE LICENSE APPLICANT MAILING ADDRESS
One Lake Drive
Lake Harmony, PA 18624

SLOT MACHINE LICENSE APPLICANT PHONE NUMBER EQUAL OPPORTUNITY OFFICER 570-722-9111 x703
Kim Harrison

DATE SUBMITTED 6 / 29 / 07 PURSUANT TO SECTION 1325(B)(1) OF THE PENNSYLVANIA RACE HORSE

DEVELOPMENT AND GAMING ACT:

APPLICANT HAS DEVELOPED AND IMPLEMENTED A DIVERSITY PLAN. A COPY OF THIS PLAN IS ATTACHED.

Wael Kalin CEO
SIGNATURE OF CEO

W. Jack Kalins
NAME PRINTED

06 / 27 / 07
DATE

Vacation Charters, Ltd.
DIVERSITY PLAN
(June 27, 2007)

PREFACE

Vacation Charters Ltd. ("Vacation Charters") population of employees is drawn mostly from Carbon County, Pennsylvania. Vacation Charters has historically encouraged equal opportunity employment and, as a result, currently has a 15 % diverse work force compared to 4% in the geographic employment area.¹ All applications for employment, advertisements and career information are in English and Spanish. Bilingual interpreters are available at job fairs and at the Human Resources Office of the resort.

Vacation Charters has developed the following Diversity Plan to assure that all persons continue to be accorded equality of opportunity in employment and contracting by Vacation Charters, our contractors, subcontractors, assignees, agents, vendors and suppliers.

The objective of this Diversity Plan is to provide opportunity and to develop and foster relationships to enhance participation of diverse groups in our business operations including recruitment, professional development, advertising, marketing, sales, public relations, purchasing, construction and philanthropy. The diversification of our workforce and business relationships is important to Vacation Charters and to our community. We plan to continue to reach out across diverse communities and constituencies throughout our community. We will also develop the necessary processes to maintain the accountability of our diversity policy and commitment.

Why We Value Diversity

- Our experience demonstrates that a diverse workforce and diverse business partners reflect our patrons and our community.
- A diverse work environment is understanding and sensitive to varying backgrounds.
- A diverse workforce develops fresh and innovative ideas.
- A diverse workplace where different cultures, capabilities, gender and age are respected and appreciated reduces conflict among diverse groups of employees, increases effectiveness of managers and improves our employee's morale.

¹ Source: U.S. Bureau of the Census 2005 statistics for Carbon County.

- Diversity increases cooperation, collaboration and team building.
- Diversity improves client/customer relations.

RESPONSIBILITY FOR IMPLEMENTATION OF DIVERSITY PLAN

Corporate Responsibility

Responsibility for implementation of our Diversity Plan is assumed by Kimberly Harrison, Personnel Director for Vacation Charters, Ltd.

Ms. Harrison's responsibilities include:

- Coordinating and developing of Diversity Plan and the establishment of goals and criteria.
- Staying advised of federal, state and local laws and regulations affecting Vacation Charters' Diversity policy;
- Keeping the company executives informed concerning the implementation of this policy,
- Advising and directing Managers and Supervisors on all obligations with respect to this Diversity Plan, including the obligation to prevent harassment of employees placed through diversity efforts.
- Dealing firmly and promptly with any efforts to impede or prevent compliance with this policy;
- Recommending new or improved practices which advance the objectives of the Diversity Plan.

REAFFIRMATION OF VACATION CHARTERS 'S EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY

Vacation Charters is committed to providing equal opportunity in employment for all people without regard to race, color, religion, sex, national origin, age, sexual orientation, marital status, disability, or veterans status and to prohibiting discrimination in employment on the basis of race, color, religion, sex, national origin, age, sexual orientation, marital status, disability or veterans status. By hiring, compensation, training, promoting, and in all ways providing equal treatment to employees, the effectiveness of our organization can be maintained while enhancing the growth and progress of our

employees. Vacation Charters maintains a Diversity Policy and Diversity Mission Statement. See Exhibits A (Diversity Policy) and B (Diversity Mission Statement) attached.

DEVELOPMENT AND EXECUTION

Job Descriptions

Job descriptions are designed to ensure that they accurately reflect the functions performed by incumbent workers. Position descriptions are uniform throughout the organization and among job titles, ensuring that such specifications are consistent and free from bias.

Dissemination of Job Descriptions

All management and supervisory personnel and recruiting sources actively involved in the recruiting, selection, screening and promotion process are given access to applicable position descriptions. New positions or job vacancies are posted on a company-wide basis, in areas accessible to all employees. These areas include posting by every time clock area, the bulletin board and on the website. The job posting includes the job title and a job summary for each of the open positions and is based upon the current position job description. Management positions, positions that are filled through redeployment or positions that are filled through progression by current employees may be filled without the use of job postings.

Evaluation of Selection Process

Vacation Charter's selection processes have no discriminatory effects upon minority groups and women. Personnel involved in the recruiting, screening, and selection of new hires are carefully selected and trained to insure the elimination of bias. Job opportunities are posted in public media including trade journals, newspapers, and the Split Rock website. Applicants may apply for open positions through a variety of methods including electronically, by mail and by facsimile.

Promotion

Vacation Charters supports the progression of current employees by recognizing and rewarding an employee's individual performance through promotional and/or developmental opportunities within their own geographic region. All candidates are evaluated based upon their skill, experience levels and behavior styles. Job training and development programs are initiated as needed to assist employees to grow in identified areas. Certification programs specific to this industry are also offered on site and create promotion opportunities. Job descriptions are validated on job performance related criteria. Vacation Charters places job postings in the personnel building and on the web,

which are available to all employees, thereby providing internal posting of available job positions without regard to race or gender.

Outside Vendors and Contractors

All new purchase orders will contain the applicable EEO compliance clause.

Specific Programs

Many of Vacation Charters' action oriented programs are the result of the overall corporate philosophy supporting diversity. These programs encompass selection, promotion, training, and also, work environment and community environment and are enumerated below.

- **Equitable Pay.** Vacation Charters compensates all employees on an equitable basis with no discrimination due to race, sex, age, religion, national origin, disability, or veteran's status. Within each group number, qualifications, job performance and years of service dictate differences in salary between individuals.
- **Management Training.** Harassment training is presented to all managers on an annual basis. Additionally, supervisors and managers regularly attend performance management workshops, one of the goals of which is to ensure the best possible working relationship between managers and staff members and to ensure the most professional treatment of the performance evaluation process.
- **Flexibility in the Workplace.** Vacation Charters has a range of flexible policies, programs and benefits to assist employees in balancing work and family responsibilities, including: short-term & long-term disability program; paid vacation and holidays; a 401(k) Plan life insurance; medical insurance; and the opportunity to purchase other provided benefits such as additional life and dental insurance.
- **Community Service.** Vacation Charters encourages employees to volunteer and participate in the community. The following is a list of local community organization in which our employees current participate: Pocono Vacation Visitors Bureau; Chamber of Commerce (Penn Kidder, Hazleton, and White Haven); Advisory Board for CCTI (Carbon County Technical Institute) and MCTI (Monroe County Technical Institute); Environmental Advisory Council of Kidder Twp; Board of Directors PTLA (Pennsylvania Tourism and Lodging Assoc.); HSMAI (Hospitality Sales and Marketing Assoc. International); RCMA (Religious Conference Meeting Assoc.); Boy Scouts of America; Kidder Twp Recycling Committee; American Red Cross (Northeastern Pa. Region); Church Youth Groups; and Local Fire and Emergency Services.

W. Jack Kalins
Chief Executive Officer
Vacation Charters, Ltd.

Dated: June 27, 2007

Diversity Plan Statement Exhibit A

Vacation Charters' Resort Diversity Policy

It is the policy of Vacation Charters to continue with our open environment to value differences and enable associates to contribute, develop, promote and recognize their various levels of potentials to reach their personal goals while obtaining Vacation Charters' goals. Vacation Charters' Policy is to apply diversity principles in relationships with our guests, suppliers and communities.

Our policies are:

- Each employee will be respectful to each other in words & actions.
- Vacation Charters' policies, procedures and systems will support and encourage diversity principles.
- Vacation Charters will create and support an environment in which each employee will have the opportunity to advance their abilities and level of expertise.
- Each employee will act with respect and participate in the diversity policy of Vacation Charters including our suppliers and our communities.

Diversity Plan Statement Exhibit B

Vacation Charters' Diversity Mission Statement

Vacation Charters is committed to ...

- Attract and maintain the most talented and qualified workforce looking to our diverse industry and seeking out the best resources available.
- Seek out qualified vendors in minority communities and empower associates from all backgrounds with an equal opportunity to train, advancement and realization of their full potential.

Vacation Charters is proud to

- Award contracts, selecting vendors, reward and promoting employees on the basis of their qualifications, achievements and contributions.
- We believe that a diverse team provides a variety of ideas and points of view for solving problems and most importantly represents who they are and value their ideas.

Vacation Charters will continue to...

- Be a role model in the Hospitality & Gaming industries in promoting diversity within all the various opportunities available.
- Maintain our commitment to provide a rewarding and exceptional environment for our associates, suppliers and vendors. One that is respectful and inclusive of all individuals regardless of their race, color, religion, gender, national origin, age, sexual orientation or disability.