



SugarHouse Casino Diversity Plan

Updated August 2010

WINNING THROUGH DIVERSITY
Sugarhouse HSP Gaming, LP
Diversity Plan

Sugarhouse HSP Gaming, LP (d/b/a “SugarHouse Casino”) is committed to the principle of winning through diversity and inclusion at all levels – ownership, management, building construction, and casino operations.

SugarHouse Casino recognizes that attracting a diverse pool of talented people and retaining them in positions at all levels of the company is essential to our success. In addition, SugarHouse Casino believes that it must be able to contract for goods and services with diverse vendors and suppliers in order to be successful. Each component of this diversity plan (the “Diversity Plan” or “Plan”) is designed to enable SugarHouse Casino to reach its goal of reaching the top of the gaming industry.

DIVERSITY AND INCLUSION MISSION STATEMENT

The following mission statement summarizes SugarHouse Casino’s commitment to diversity. It will be posted in prominent places throughout the facility. It communicates the foundation of our diversity and inclusion mission to Team Members, business partners and our community:

SugarHouse Casino is devoted to building and nurturing a diverse and inclusive environment, and is committed to equal opportunity employment and participation by all team members in all employment classifications throughout the organization. This commitment to equal opportunities and diversity also applies to our vendors, suppliers and independent contractors.

- *We are committed to recruiting, employing, training and advancing talented people of any race, color, national origin, ancestry, sex, sexual orientation, sexual identity and expression, marital status, family status, lifestyle, age, culture, religion, military and veteran status, citizenship, or disability.*
- *We actively search for a diverse pool of candidates to provide us with a depth of talent, skills and potential to meet our goals in all employment levels of our operation.*
- *We celebrate our diversified employee base and appreciate its cooperative power as a means to meet our business goals.*
- *We are committed to offer opportunities to diverse vendors, suppliers, contractors and other service providers from throughout the City of Philadelphia and surrounding counties to enhance the participation of such groups in the success of our facility.*
- *We require that our contractors and vendors practice equal opportunity policies when they deal with others who provide goods or services to us.*

SugarHouse Casino believes that when we partner with diverse persons and businesses, there are limitless opportunities to share knowledge and expertise, and to ultimately assist each other to grow and succeed.

LEADING TO WIN

A strategic plan must be driven from the highest levels of a company if the plan is to succeed. At SugarHouse Casino the ultimate responsibility for winning through diversity lies with the General Manager who will serve as the Chief Diversity Officer (the “Chief Diversity Officer”). The Chief Diversity Officer is responsible for strategic planning and evaluation of each department’s success in the implementation of the Diversity Plan. SugarHouse Casino will also have a designated diversity director (“DD” or “Diversity Director”) who will provide reports to the General Manager and operate with the authority of the General Manager to monitor the Diversity Plan and other related initiatives. The DD reports directly to the General Manager. The DD will be chosen annually from the members of the Diversity Task Force. The Diversity Task Force shall be comprised of Senior Team Members of the following departments: Procurement, Human Resources, Operations, Finance, Compliance and Community Relations. The Task Force will meet with the management team on a quarterly basis to ensure that SugarHouse Casino meets the commitments of this Diversity and Inclusion plan.

ORGANIZED TO WIN

The Diversity Director, together with the Diversity Task Force, shall serve as the monitor for accountability for Team Member’s involvement in fulfilling the company’s Diversity and Inclusion Plan.

The Diversity Task Force

The Diversity Director and Task Force duties shall include:

- Developing policy statements and diversity programs to effectuate the Diversity and Inclusion Plan.
- Developing and executing internal and external communication including:
 - The dissemination of the Diversity and Inclusion Mission Statement throughout the company as well as to business partners, prospective Team Members, Team Members, contractors and vendors.
- Identifying opportunities for improvement.
- Assisting line management in implementation of SugarHouse Casino Diversity and Inclusion Plan and in arriving at solutions to any perceived impediments.
- Designing and reporting information that will:
 - Measure the effectiveness of the Diversity and Inclusion Plan;
 - Identify areas with opportunities for improvement;
 - Determine the degree to which objectives have been attained;
 - Provide all required statistical reports and documentation to the Pennsylvania Gaming Control Board (the “PGCB”) as required.
- Serving as liaison between SugarHouse Casino and law enforcement agencies, workforce agencies focused on developing employment opportunities for minorities and women, community-based civic

organizations, and other non-profit community service agencies.

- Performing periodic reviews of hires, promotions, terminations, job classifications, management and supervisory practices, work assignments, training, upward mobility programs, and other terms and conditions of employment as necessary, to ensure adherence to the goals of the Diversity and Inclusion Plan.
- Ensuring that the Diversity and Inclusion Plan's Mission Statement is identified and posted in Team Member areas.
- Keeping SugarHouse Casino management and line supervisors informed of the latest developments pertaining to diversity and monitoring best practices in diversity among gaming companies with guidance from the American Gaming Association.
- Assisting the purchasing department in fulfilling the goal of creating participation opportunities for diverse groups in the supply of goods and services to the facility.
- Assisting the purchasing department in the development of a diverse vendor and supplier data base in order to better ensure participation by minority, women, and disadvantaged business entities ("M/W/DBE's").

Developing Winning Managers and Supervisors

SugarHouse Casino managers and supervisors are responsible for implementation of the Diversity and Inclusion Plan and the goal of winning through diversity. The responsibilities of managers and supervisors include:

- Assisting in the identification of opportunities for improvement and the establishment of unit objectives, which will be developed and reviewed on an ongoing basis.
- Encouraging all Team Members to participate in SugarHouse Casino's Training and Development Programs.
- Encourage fair treatment of all Team Members and discouraging the harassment, intimidation or coercion of any Team Member.
- Encouraging all Team Members, to participate in company-provided training programs that can assist in their advancement.
- Promoting and fostering a collaborative work environment that celebrates and respects diversity.

WINNING PROGRAMS: DIVERSE TEAM MEMBERS AT ALL LEVELS OF THE COMPANY

Recruiting Practices

SugarHouse Casino will implement a number of concrete steps to ensure that this Plan is followed in the recruitment of team members at the SugarHouse Casino:

- Human Resources will notify all Managers on a regular basis of all open positions.
- A list of job openings will be distributed on a regular basis to recruitment sources, including workforce development agencies and community-based organizations, that are equipped to reach disadvantaged populations.
- A list of job openings will be distributed on a regular basis to local colleges, universities, community colleges, trade schools and other organizations that are involved in higher education.
- SugarHouse Casino will also have an informational employment section on its website explaining our Diversity Mission Statement and list available job openings, and when possible, links to community action agencies with which SugarHouse Casino have partnered.
- Available positions at SugarHouse Casino will be posted on our Company web-site with a brief description and minimum requirements; so that all qualified internal Team Members and qualified external applicants will have an opportunity to apply.
- When advertising for employment opportunities SugarHouse Casino will advertise using typical advertising means and will include advertising in minority publications in Philadelphia Metropolitan area, and other publications designed to reach a diverse pool of applicants.
- Human Resources/the Diversity Director will take appropriate measures to identify and coordinate recruitment efforts with employment sources serving disadvantaged and minority persons.
- The Human Resources Department in collaboration with the Diversity Director/ Task Force will review and implement on a regular basis additional ways to improve the pool of diverse candidates for all openings.

Job Postings

All positions will be posted for a minimum of three (3) days and maintained on the Careers section of the SugarHouse Casino website and/or other areas of the casino.

Applicant Referral Process

- All applicants, internal and external, shall be referred to Human Resources.
- Human Resources will identify all qualified internal applicants for positions and refer them to Department Managers for consideration.
- Human Resources will identify all qualified external applicants for position openings, once the position has been posted on the company website www.SugarHouseCasino.com for a minimum of three (3) days. All qualified applicants will be referred to Department Managers to be interviewed.

College Recruitment

The Human Resources Department will issue notices to career service departments of colleges and universities on a local, state and national level, informing them of our Diversity and Inclusion Mission Statement and initiatives to promote a diverse workforce and will inform them of SugarHouse Casino's interest in interviewing students and graduates whose educational training and background have prepared them for opportunities within our industry.

Career Fairs

Human Resources and/or the Diversity Director and Task Force members or their representatives shall attend career fairs in which minorities and women traditionally participate and distribute information which describes the job opportunities available and company sponsored training programs.

Leadership Development

SugarHouse Casino provides internal development opportunities for all team members. Each team member has the opportunity to continue to develop as part of their career path and succession planning for progressive responsibilities. Each Department Leader will have the responsibility to develop Team Members for advancement within the company and encourage each team member to take advantage of the necessary training that will enable them the opportunity to qualify for a current or future open position. The Vice President of Human Resources/Task Force/ Diversity Director will monitor each department to ensure that all Team Members are given the opportunity to participate in all programs for advancement.

Diversity Awareness Training for Team Members

As part of SugarHouse Casino's core courses, all team members will be required to complete the Diversity Awareness Training Program during employee orientation. This Diversity training will focus on building an awareness of the valued differences of fellow team members and guests. Our diversity training efforts will be designed to ensure that all team members are aware of the company's diversity philosophy, and incorporate this philosophy in their day to day practices within the workplace. In order to provide the very best guest service, it is necessary for our team members to understand the importance and have an appreciation of people's differences.

As part of SugarHouse Casino's Management Development core courses, all managers and supervisors will be required to complete the Diversity Management Training. In addition to the Management Development core courses all management will be required to undergo training that is focused on recognizing and managing individual differences of all team members and guest.

Complaint Resolution Process

SugarHouse Casino will encourage fair treatment of all Team Members and discourages the harassment, intimidation or coercion of any Team Member. The following process to resolve discrimination and harassment complaints will be as follows:

If an individual feels that he or she has been a victim of harassment or discrimination in any form by a manager, supervisor, co-worker, customer, client, or any other person in connection with their employment, they should notify their supervisor, or the Human Resources Department, with the alleged incident or problem immediately. If the complaint involves the team member's direct supervisor or someone in the team member's direct line of supervision they should contact the Human Resources Department. If an employee is uncomfortable with discussing this matter with the designated manager and/or supervisor or is not satisfied with the action taken by their designated manager and/or supervisor they may select to bypass these individuals, and notify the Human Resources Department immediately.

Supervisors and managers should take each complaint of harassment/discrimination seriously and should not make judgments or opinions as to the validity of the complaint. Each complaint brought to the attention of a supervisor/manager must be reported to the Human Resources Department immediately.

All allegations will be investigated by the Human Resources Department in a timely and confidential manner. They will take appropriate corrective action when warranted. Any team member, who is found, as a result of the investigation, to have engaged in harassment or discrimination is in violation of this policy, will be subject to appropriate disciplinary action, up to and including termination of employment. Retaliation in any form against any team member who exercises his or her rights to file a complaint is strictly prohibited, and will itself be cause for appropriate disciplinary action up to and including termination of employment.

WINNING PROGRAMS: DIVERSE SUPPLIERS AND VENDORS

The Director of Purchasing and the Diversity Director will share the responsibility for identifying and encouraging the participation of minority, disadvantaged, and women-owned businesses.

The Diversity Director/Director of Purchasing will encourage representation and participation of diverse groups in the ownership and operation of businesses that will serve the facility and provide goods and services to the facility. We are committed to procuring goods, products, and services from a diversified pool of vendors and professional service providers. Our strategy is to work with a broad range of suppliers that are competitive in quality, service, and price. All suppliers are encouraged to support diversity efforts through the use of second-tier supplier programs.

SugarHouse Casino will take the following actions:

- SugarHouse Casino will utilize the list of the minority and women's business enterprises that are pre-qualified by the Bureau of Minority and Women's Business Enterprises of the Pennsylvania Department of General Services to seek goods and services from diverse vendors.
- SugarHouse Casino will "partner" with local organizations within the Greater Philadelphia Metropolitan area, including but not limited to, the City of Philadelphia Office of Economic Opportunity, the African-American Chamber of Commerce of PA, NJ and DE, the Asian-American Chamber of Commerce of Greater Philadelphia, the Greater Philadelphia Hispanic Chamber of Commerce, the Minority Supplier Development Council of PA, NJ and DE, the Women's Business Enterprise Council of PA, DE, and sNJ, and the Pennsylvania Minority Business Enterprise Council.

- SugarHouse Casino will provide a link on the company's website to assist local organizations within the greater Philadelphia Metropolitan area, and will include itemized procurement needs and provide informational assistance, such as certification requirements and certification bodies, for all vendors.
- SugarHouse Casino will make available on its website www.SugarHouseCasino.com information describing procurement needs, processes and general contract information.
- SugarHouse Casino will participate in American Gaming Association events such as the Opportunity Expo, to find qualified and certified M/W/DBEs to do business with.
- SugarHouse Casino purchasing personnel will help qualified vendors and suppliers (as defined by the Pennsylvania Department of General Services), where necessary, by providing pertinent information and feedback so that they can compete effectively on price, service and product quality.
- SugarHouse Casino purchasing personnel will track dollar volume and performance of suppliers and vendors and provide reports/data to the Diversity Director to monitor compliance with the Diversity Plan.
- SugarHouse Casino through the Diversity Director will be collecting data and issuing reports needed for periodic diversity reporting, including quarterly participation reports as defined and required by PGCB.
- SugarHouse Casino will be working with the Director of Purchasing/ Diversity Director on development of an M/W/DBE network and the implementation of the Diversity Plan.
- SugarHouse Casino purchasing personnel and internal end-users will be trained on supplier diversity policies and procedures and compliance requirements.

WINNERS NEVER QUIT: AUDIT AND REPORTING SYSTEM

At SugarHouse Casino, we know that we were aiming high when we set Winning Through Diversity as our goal. And we know that winners cannot sit back and hope to achieve their goals. Consequently, our plan for winning includes self-scrutiny because winning means always setting the bar higher.

Internal Progress Reports

The Director of Diversity and Task Force shall monitor company progress to carry out the Diversity and Inclusion Plan. The DD/Task Force shall receive employment and procurement activity reports for each department and M/W/DBE participation reports, at a minimum on a quarterly basis. These reports shall be used to compile a periodic progress report to be submitted to the Diversity Plan Task Force for review and comments. The Task Force shall assist department managers and supervisors and project site managers by recommending specific actions.

Report of Participation

SugarHouse Casino shall file an annual report with the PGCB which sets forth the Company's performance in fulfilling the goals of this Diversity and Inclusion Plan. The report shall contain all of the following:

- Employment data, including information on minority and women representation in the workforce in all job classifications; averages salary ranges; and recruitment and training information, including executive and managerial level recruitment and training; and retention and outreach efforts.
- The total number and value of all contracts and/or subcontractors awarded for goods and services.
- An identification of each subcontract actually awarded to a minority or women-owned business enterprise under contracts containing a participation plan during each calendar quarter and the actual value of each such subcontract.
- A comprehensive description of all efforts made by the licensed entity or applicant to monitor and enforce the participation plan.
- Information on minority and women investment, equity ownership, and other ownership or employment opportunities initiated or promoted by the licensed entity.
- Other information deemed necessary or desirable by the PGCB to ensure compliance with the rules and regulations governing gaming in Pennsylvania.