

## VALLEY FORGE CONVENTION CENTER PARTNERS, LP

### DIVERSITY PLAN

#### OBJECTIVES

Valley Forge Convention Center Partners, LP ("VFCC PARTNERS") values its employees and business partners as integral keys to its continuing success. To that end, VFCC PARTNERS has established this Diversity Plan to assure that all of its business policies and practices support and actively promote the central goal of equal opportunity in all aspects of employment, procurement, contracting and community involvement. By assuring equal access to all of its business and employment opportunities, VFCC PARTNERS will achieve the following objectives:

- A diverse workforce and diverse business partners that reflect the communities in which we exist
- A diverse work environment with policies, procedures and systems that support and encourage the principles of diversity
- A diverse workforce where different cultures, capabilities, genders and ages are respected and cultivated as a strength

- Improved patron relations through better understanding of varying backgrounds and presenting positive business practices
- Increased cooperation, collaboration and team-building amongst the workforce members
- Improved profitability through a stronger work environment
- Enhancing our surrounding communities through inclusion of all cultures

VFCC PARTNERS is proud of the history of its facility in maintaining a highly diverse workforce and looks forward to continuing that tradition as its entertainment offerings expand and grow.

### **POLICY STATEMENT**

VFCC PARTNERS believes that each employee is an integral part of its success and is committed to the principles of diversity and equal opportunity. All employment related decisions will be made without regard to race, gender, age, marital status, sexual orientation, religion, national origin, citizenship status, disability or any other protected status. This applies to recruitment, hiring, training, promotion and all other actions/conditions of employment such as compensation, benefits, reduction-in-force layoffs, reinstatements, training, tuition assistance and disciplinary actions. All employees are assured an equal opportunity to make the

maximum contribution to VFCC PARTNERS and also to further their own career goals.

VFCC PARTNERS also believes that its business partners are also very important to its success and is committed to applying the same underlying principles of diversity and equal opportunity to its procurement and contracting practices. All management and staff will assure that opportunities for doing business with VFCC PARTNERS are open to all qualified vendors and contractors and, to that end, outreach efforts will be made to identify and include in those opportunities certified minority-, women- and disabled-owned enterprises.

### **RESPONSIBILITY**

While the ultimate responsibility for this Diversity Plan rests with the Chief Executive Officer of VFCC PARTNERS, successful implementation requires the concerted efforts of all management and staff accepting the tenets of this plan's philosophy as an integral part of their daily work routine. Adherence to the Diversity Plan is a part of each employee's job description and, in varying degrees based on position, will be incorporated into their performance evaluations.

Overseeing implementation of this Diversity Plan will be a Diversity Committee comprising the Vice President/Managing Director, the Vice President/Slot Operations, the Director of Human Resources & Diversity and the Controller. The Diversity Committee may invite additional participation from other management or associates, including women,

racial/ethnic minorities and/or disabled persons and outside counsel. This Diversity Committee will be responsible for the following:

- Establishment and continuing review of the goals and objectives of this Diversity Plan
- Periodic meetings (at a minimum, quarterly) to review quantifiable and other achievements with regard to diversity objectives
- Assessment of areas for improvement and additional beneficial actions in furtherance of Diversity Plan objectives
- Review of complaints and areas of non-compliance and determination of appropriate corrective and/or disciplinary actions
- Assuring that the diversity efforts of VFCC PARTNERS are in accordance with the requirements of the Pennsylvania Gaming Control Board

Day-to-day management of the Diversity Plan is the responsibility of the Director of Human Resources & Diversity (the "Diversity Officer"). In this capacity, the Diversity Officer will be responsible for the following:

- Coordinating implementation of policies and procedures in support of the goals and objectives of this Diversity Plan
- Advising and directing management members on all obligations with respect to the Diversity Plan
- Recommending new or improved policies and procedures which advance the objectives of the Diversity Plan
- Receiving, reviewing and resolving any complaints of discrimination or other non-compliance with regard to equal treatment

- Monitoring and reporting to the Diversity Committee the progress of diversity objectives through quantifiable summaries of employment and business opportunity activity and other matters
- Ensuring awareness of this Diversity Plan internally and externally

## EMPLOYMENT

Promoting equal employment opportunity is a primary goal of this Diversity Plan. Efforts to achieve and maintain open access to employment by VFCC PARTNERS will include the following:

- Awareness:
  - Ensuring awareness of the Diversity Plan goals through internal and external advertising and notices, as detailed below
  - Including, as appropriate, women, minority and disabled employees in advertisements
- Development:
  - Including furtherance of the Diversity Plan in all job descriptions
  - Ensuring that job descriptions are uniform and free of bias
  - Employing community outreach efforts to promote awareness of employment opportunities, including minority, women and disabled oriented organizations
  - Identifying areas of under-representation of minorities, women and/or disabled persons and developing action programs to increase participation
- Employment:

- Integrate management discussions of diversity objectives and progress as a part of ongoing management meetings
- Promote nondiscriminatory practices relating to personnel selection and promotions
- Monitor and evaluate diversity by department to gauge progress toward goals

### **BUSINESS OPPORTUNITY**

Participation in the numerous business opportunities arising from VFCC PARTNERS operations should be available to a broad spectrum of potential business partners, to include minority-, women- and disabled- owned businesses (“MBEs/WBEs/DBEs”) and, most particularly, those certified as such by the Commonwealth of Pennsylvania. Efforts to achieve and maintain such procurement and contracting participation shall include the following:

- Awareness:
  - Ensuring awareness of the Diversity Plan goals through internal and external advertising and notices, as detailed below
  - Advertising in media targeted towards MBEs/WBEs/DBEs
- Solicitation:
  - Including notice of the Diversity Plan objectives in all contracts and requests for proposals
  - Coordinating solicitation efforts with appropriate governmental agencies assisting MBEs/WBEs/DBEs

- Promote nondiscriminatory practices relating to vendor/contractor selection and promotions
- Monitor and evaluate diversity by department to gauge progress toward goals
- Outreach:
  - Attending/hosting vendor fairs to meet potential vendors and contractors and educate them as to business needs and processes
  - Promote awareness of business opportunities to various business and community groups, including minority MBEs/WBEs/DBEs-oriented business organizations
  - Promoting and assessing contractors' diversity efforts

## COMMUNICATION

Awareness of the Diversity Plan and the Company's efforts related thereto is a crucial component to the effectiveness of such efforts. Management, staff associates, vendors, contractors and the general public all benefit from being informed of the Diversity Plan objectives and procedures. Dissemination of information regarding the Diversity Plan shall include the following:

- Internal Communications
  - Inclusion of our Diversity Statement in the Employee Handbook
  - Annual reaffirmation of commitment to Diversity Plan via notice to all employees
  - Postings in suitable areas for employee information

- Inclusion of diversity in job descriptions and as a part of the job performance evaluation process
- Discussions during employee orientation and training sessions
- Periodic discussions of progress evaluations with management team
- External Communications
  - Advertising in employment and business sections of appropriate types of media
  - Participating in employment and business notification programs of the Pennsylvania Gaming Control Board
  - Distribution of literature to organizations actively supportive of minorities, women and disabled persons and MBEs/WBEs/DBEs

## **MONITORING AND REPORTING**

Establishing a process for monitoring progress in achieving diversity goals will play an important role in the ability to evaluate the effectiveness of our efforts. While the maintenance of a truly diverse work environment includes many subjective issues, there are also numerous objective criteria that can be quantified, critiqued, influenced and reported.

- Maintain summaries of job applicants for positions posted
- Produce periodic summaries of the employment workforce makeup by race and gender and changes over time



- Maintain statistics on vendor / contractor business volumes with MBEs/WBEs/DBEs and changes over time
- Maintain statistics on contacts with outside organizations in furtherance of diversity outreach efforts
- Present periodic reports of quantifiable statistics to the Diversity Committee and to the management team
- File annual reports on Diversity Plan compliance with the Pennsylvania Gaming Control Board and other appropriate regulatory agencies