

- 2) Once a patron has shown they are 21 years of age or older through the production of valid and legally acceptable verification of their age/identification, Security will offer them the option to wear a wrist band that will identify to other employees that the person has been carded and has proven they are at least 21 years of age.
- 3) All patrons on the gaming floor or in areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted, who appear to be under the age of 30 and who are not wearing a wrist band as identified above will be asked by Security to produce valid and legally acceptable verification of their age/identification.
- 4) If a patron on the gaming floor or in areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted is found to be under the age of 21, Security will immediately contact the Casino Compliance Representative on duty, Pennsylvania State Police ("PSP") and Surveillance. If the individual is at least 18 years of age and, through a surveillance footage review and/or direct observation by security, it is determined that the patron has not been involved, directly or indirectly, in any gaming-related activity (including any type of transaction at the Cage), Security will contact Surveillance, PSP and the Casino Compliance Representative on duty and will advise the patron of the property's policy against anyone being on the gaming floor or areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted under the age of 21 and a security officer will remove the individual from the gaming floor or areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted.
- 5) If a patron on the gaming floor or in areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted is found to be under the age of 18, Security will immediately contact the Casino Compliance Representative on duty, PSP and Surveillance.
- 6) If a patron on the gaming floor or areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted is found to be under the age of 21, Security will immediately notify the Casino Compliance Representative on duty, PSP and Surveillance. If, through a surveillance footage review, and/or direct observation by any employee it is determined that the patron has been involved, directly or indirectly, in any gaming-related activity (including any type of transaction at the Cage), the underage individual will be escorted off the gaming floor or areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted by Security and/or the Casino Compliance Representative and/or PSP. Security and/or the Casino Compliance Representative on duty will facilitate a "cash out" of the slot machine prior to initiation of the escort. The underage individual will be removed to the PGCB and/or PSP offices for processing. Security and/or the Casino Compliance Representative on duty will confiscate all the winnings and Security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the PGCB upon request.
- 7) If the patron cannot produce acceptable identification, Security will immediately contact the Casino Compliance Representative on duty, PSP and Surveillance. If the age of the individual cannot be ascertained, Security will defer to the Casino Compliance Representative and/or PSP as to how to proceed. At a minimum, the patron will be removed from the gaming floor or areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted.
- 8) Security will inform individuals that they are not allowed on the gaming floor or in areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted until they turn 21 and individuals who violate will be advised that they are subject to arrest for trespass. Security will issue the patron a formal trespass notice and will prepare an iView incident report describing the details of the incident. A copy of the report shall be forwarded to Compliance Manager and the Casino Compliance Representative.

- b. **Surveillance Department** Surveillance is responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted, and limited portions of the food and beverage areas in the facility. The Director of Surveillance and all Surveillance personnel are responsible for monitoring these areas for patrons appearing to be under the age of 21 who are on the gaming floor, or in areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted, and/or are engaged in gaming-related activities.
- 1) Upon identification of an individual suspected to be under 21, the Surveillance personnel shall notify Security who will enact the security procedures related to underage gambling as set forth above.
 - 2) Surveillance will immediately track the individual and thereafter, will assist the Casino Compliance Representative and PSP in conducting a review of surveillance footage of the individual's movement on the gaming floor or areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted to advise Casino Compliance Representative and PSP if the individual had engaged in gaming-related activities.
 - 3) Surveillance will document the incident and notification efforts on an incident report and will provide a copy of the surveillance tape/disc and timeline to the Casino Compliance Representative with a copy of the incident report.
- c. **Slots Department** All Slot Services personnel are responsible for the visual monitoring of patron activity on the gaming floor or areas off the gaming floor where slot machine, contests or tournaments are conducted. Moreover, Slot personnel also are responsible for checking valid, legally acceptable, government issued photo identification and the REDACTED prior to payment of a hand paid jackpot exceeding \$1,199, issuing a comp or issuing a players card to ensure that the individual is not underage or excluded.
- 1) When Slot Services personnel identify an individual who is on the gaming floor, or areas off the gaming floor where slot machine contests or tournaments are conducted engaged in gaming-related activities or consuming alcohol, and who is suspected to be under 21 years of age, they are required to immediately notify their supervisor or Security. If a supervisor is notified, that person is responsible for immediately notifying Security. Upon such notification, Security will enact the security procedures related to underage gambling as set forth above.
- d. **Table Games Department** Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where banking table game or poker contests or tournaments are conducted, to ensure that underage individuals are identified and prevented from participating in gambling activities. In addition, Table Games supervisors are also responsible for verifying identification of patrons prior to issuing a comp or players card, to ensure that the individual is not underage or on a self-exclusion or exclusion list.
- i. When a Table Games Department employee identifies an individual who is on the gaming floor, or areas off the gaming floor where banking table game or poker contests or tournaments are conducted, who is engaged in gaming related activities or consuming alcohol and is suspected to be under 21 years of age, they are required to immediately notify their supervisor or Security. If a supervisor is notified, that person is responsible for immediately notifying Security. Upon such notification, Security will enact the security procedures related to underage gambling as set forth above.

- e. **Cashier's Cage/Credit/Player Services Department** All front-line cage cashiers will request valid, legally acceptable, government issued photo identification as proof of identity and age and will then check the identification against the REDACTED for any restrictions prior to cashing checks or processing, wire transfers, customer deposits and withdrawals, counter check issuance and redemption, and jackpot payouts.
- 1) If a patron can not produce legally acceptable identification showing proof of age, or the ID shows the patron is under the age of 21, the cashier will not proceed with the transaction. If the patron is under the age of 21 or appears to be under 30 years of age or if the transaction is deemed suspicious, the cashier will immediately notify Security. Security will enact the security procedures related to underage gambling as set forth above and if necessary will investigate if the transaction is suspicious.
 - 2) Where funds are confiscated, the Cage will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safe keeping of the redeemed winnings until the PGCB requests remittance.
 - 3) Employees of the Cage/Credit/Players Services Department who are responsible for credit procedures will ensure that individuals who are underage do not receive credit. If a patron can not produce legally acceptable identification showing proof of age, the Cage/Credit/Players Services department employee will not proceed with the creation of a signature file or preparation of or increase of a credit line, and will immediately notify the Security department. If the Cage/Credit/Players Services department employee is unable to verify the age of the individual, he will immediately notify the Security department, who will enact the security procedures related to underage gambling as set forth above.
 - 4) Cage/Credit/Players Services personnel require legally acceptable identification prior to registering an individual in the REDACTED and issuing a Player's Club Card.

A Player's Club Card will not be issued to an individual under 21. At the time of Player's Club registration, a patron must provide valid, legally acceptable, government issued photo identification. A PIN number must be established if the patron intends to use downloadable credits placed on the card. Since the Player's Club card number and PIN number are integrated into the REDACTED, no self redemption or use of the points on the Player's Card can occur without the use of a valid card and the PIN number.

Marketing When Marketing personnel identify an individual who is on the gaming floor, engaged in gaming-related activities or consuming alcohol and who is suspected to be under 21 years of age, they are required to immediately notify their supervisor or Security. If a supervisor is notified, that person is responsible for immediately notifying Security. Upon such notification, Security will enact the security procedures related to underage gambling as set forth above.

Additionally, Table Games, Marketing, Cage/Credit/Players Services and F&B personnel are required to card an individual who appears to be under 30 unless that individual has a wrist band issued by Security indicating that the patron has been carded and proven they are 21 or older. In addition to Security, Table Games, Cage/Credit/Players Services and F&B will have a system capable of swiping the identification to ascertain its validity. Security will maintain such a hand held device at each public entrance to the gaming floor. Employees who observe suspected underage gaming-related activity but who are not authorized to card patrons must contact their supervisor or Security immediately.

Additionally, within 50 feet of each entrance and exit of the gaming floor, HCP shall post the following signage (see **Exhibit F**):

- a. It is unlawful for any person under 21 years of age to engage in any gaming activities. Individuals violating this prohibition will be removed and may be subject to arrest for criminal trespass under 18 Pa.C.S. § 3503 (relating to criminal trespass).

Procedures to prevent an excluded person from gambling

The PGCB will maintain a list of persons to be involuntarily excluded or ejected from a licensed facility. HCP prohibits such excluded persons from gambling. HCP maintains electronic and hard copies of the most current version of the Exclusion List published by the PGCB. Such Exclusion List will be distributed by the Compliance Manager or his or her designee to the following departments whenever it is updated:

- Security
- Surveillance
- Cage/Credit/Player Services
- Table Games

Additions to and deletions from the PGCB exclusion list will be received from the PGCB by the Compliance Manager. He or his designee will forward the information to Security, Surveillance and the Cage/Credit/Player Services within 2 business days of receiving the notice from the PGCB.

REDACTED

Any employee who suspects that an individual is on the Exclusion List shall immediately notify Security who will enact the security procedures related to Excluded Persons as set forth below.

The General Manager shall inform the Bureau of Investigations and Enforcement, in writing, of the names of persons that HCP believes are appropriate for placement on the exclusion list or a person who has been excluded or ejected because they meet one or more of the following criteria, and the reason for placement on the list:

- a. A career or professional offender, whose presence in a licensed facility would, in the opinion of the Board, be inimical to the interest of the Commonwealth or of licensed gaming therein, or both.
- b. An individual with a known relationship or connection with a career or professional offender whose presence in a licensed facility would be inimical to the interest of the Commonwealth or of licensed gaming therein, or both.
- c. A person who has been convicted of a criminal offense under the laws of any state, or of the United States, which is punishable by more than 1 year in prison, or who has been convicted of any crime or offense involving moral turpitude, and whose presence in a licensed facility would be inimical to the interest of the Commonwealth or of licensed gaming therein, or both.
- d. A person whose presence in a licensed facility would be inimical to the interest of the Commonwealth or of licensed gaming therein, or both, including:
 - o Cheats.
 - o Persons whose gaming privileges have been suspended by the Board.
 - o Persons whose Board registrations, certifications, permits, licenses or other approvals have been revoked.
 - o Persons who pose a threat to the safety of the patrons or employees of a licensed gaming entity.
 - o Persons with a history of conduct involving the disruption of the gaming operations within a licensed facility.
 - o Persons subject to an order of a court of competent jurisdiction in this Commonwealth excluding those persons from licensed facilities.
 - o Persons with pending charges or indictments for a gaming or gambling crime or a crime related to the integrity of gaming operations in this Commonwealth or another jurisdiction.
 - o Persons who have been convicted of a gaming or gambling crime or crime related to the integrity of gaming operations in this Commonwealth or another jurisdiction.
 - o Persons who have performed an act or have a notorious or unsavory reputation that would adversely affect public confidence and trust in gaming, including, being identified with criminal activities in published reports of various Federal and State legislative and executive bodies that have inquired into criminal or organized criminal activities.

The means of identifying an excluded patron are as follows:

- a. While attempting to obtain a player's card, patron produces identification and is identified as excluded through REDACTED
- b. Patron attempts a transaction at the cage requiring presentation of identification and is identified as excluded through REDACTED
- c. Patron wins a jackpot or other transaction requiring presentation of identification and is identified as excluded through REDACTED

- d. Patron is identified as excluded through REDACTED during comping process
- e. Patron uses player's card in slot machine, thereby alerting Surveillance
- f. Employee visually recognizes patron as being excluded

1. **Security Department** Upon visual identification (e.g., via surveillance or in person) of a person suspected to be on the exclusion list, Security will immediately contact Surveillance for comparison and consultation of physical features/photographs consistent with those identified on the exclusion list published by the PGCB or photographs entered into the REDACTED. If a comparison match is indicated, a Security supervisor will verify the identification of the individual and will immediately contact the Casino Compliance Representative on duty and Surveillance. The individual will be escorted off the gaming floor by Security and/or the Casino Compliance Representative. If the individual was engaging in gaming-related activities, Security and/or the Casino Compliance Representative on duty will facilitate a "cash out" of the slot machine prior to initiation of the escort. The individual will be removed to the PGCB offices for processing. Security and/or the Casino Compliance Representative on duty will confiscate all the winnings, and Security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the PGCB upon request.
 - i. Security will complete a formal eviction form for the individual and will be advised that subsequent violations will result in an arrest for trespass.
 - ii. The Security supervisor will document this event on the incident report and forward for departmental review and forward to the Compliance Manager. The Security supervisor will notify the Director of OCPG of the incident via e-mail within 24 hours.

2. **Surveillance Department** Surveillance personnel accept responsibility for the electronic monitoring of all gaming areas, areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted, and limited portions of food and beverage areas in the facility. Within 2 business days of HCP's receipt of additions to the Excluded Persons list from the PGCB, Excluded persons will have their player accounts flagged by the Surveillance supervisor or his designee or, if there is no player account for the individual, their names and personal information will be entered on the REDACTED and the account will be flagged by Surveillance supervisor or his designee. All surveillance personnel are responsible for becoming familiar with the photographs of the excluded persons and for monitoring the abovementioned areas for excluded persons.
 - i. Upon identification of an individual suspected to be on the Exclusion List, the Surveillance personnel shall notify Security who will enact the security procedures related to excluded persons as set forth above.
 - ii. Surveillance will immediately track the individual and thereafter, will assist the Casino Compliance Representative in conducting a review of the individual's movement on the gaming floor or in areas off the gaming floor where slot machine, banking table game or poker contests or tournaments are conducted.
 - iii. Surveillance supervisor will document the incident and notification efforts on an incident report and will provide a copy of the surveillance tape/disc and timeline to the Casino Compliance Representative with a copy of the incident report.

3. **Slots Department** All slot attendants are responsible for the visual monitoring of patron activity on the gaming floor or in areas off the gaming floor where slot machine contests or tournaments are conducted. Moreover, Slot personnel also are responsible for checking the valid, legally acceptable, government issued photo identification and the REDACTED prior to payment of a hand paid jackpot (exceeding \$1,199), issuing a comp or issuing a player's card to ensure that the individual is not

on the exclusion list.

- i. If any slot attendant identifies, or receives notification, of an individual who is on the gaming floor or in areas off the gaming floor where slot machine contests or tournaments are conducted, and/or engaged in gaming-related activities and is suspected to be on the exclusion list, the slot attendant will immediately notify Security who will enact the security procedures related to excluded persons as set forth above.
4. **Table Games Department.** Table Games employees are responsible for the monitoring of patron activity on the gaming floor and areas off the gaming floor where banking table game or poker contests or tournaments are conducted, to ensure that excluded individuals are identified and prevented from participating in gambling activities; Table Games staff would only be able to identify an individual as being on the excluded list if the individual is forced to present identification (ID or players card) which indicates the patron is flagged as excluded in the REDACTED. In addition, Table Games Supervisors are also responsible for verifying identification of patrons prior to issuing a comp or players card, to ensure that the individual is not underage, or on a self-exclusion or exclusion list.
 - i. When a Table Games Department employee identifies an individual who is on the gaming floor, or areas off the gaming floor where banking table game or poker contests or tournaments are conducted, and/or is engaged in gaming-related activities, who is suspected to be on the exclusion list, they are required to immediately notify their supervisor or Security. If a supervisor is notified, that person is responsible for immediately notifying Security. Upon such notification, Security will enact the security procedures related to excluded persons as set forth above.
5. **Cashier's Cage/Credit Department/Player Services.** All front line cage cashiers will request valid, legally acceptable, government issued photo identification as proof of age and will check the identification against the REDACTED prior to cashing checks or processing wire transfers, customer deposits and the preparation of jackpot payout slips.
 - i. If the individual does not provide ID or is flagged as an excluded person in the REDACTED, the cashier will not proceed with the transaction. If the patron is suspected of being excluded, is flagged as an excluded person or appears to be under 30 years of age or if the transaction is deemed suspicious, the cashier will immediately notify Security who will enact the security procedures related to excluded persons as set forth above.
 - ii. Where funds are confiscated, the Cage will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safe keeping of the redeemed winnings until the PGCB requests remittance.
 - iii. Employees of the Cage/Credit/Players Services Department who are responsible for credit processes will ensure that individuals who are excluded do not receive credit by referring to their account in the REDACTED. All Cage/Credit/Players Services personnel are responsible for checking the valid, legally acceptable, government issued photo identification and the REDACTED prior to issuing a Players Club Card to ensure that the individual is not on any exclusion list. A Player's Club Card will not be issued to an individual who is flagged in the REDACTED as being excluded.
 - iv. If a patron cannot produce acceptable photo identification or if the patron's account in the REDACTED is flagged as excluded, the Cage/Credit/Players Services department employee will not proceed with the creation of a signature

file or preparation of or increase of a credit line, and will immediately notify the Security Department. If the Cage/Credit/Players Services department employee is unable to verify the identity of the individual, they will immediately notify the Security Department, who will enact the procedures related to self-excluded patrons as set forth above.

While the REDACTED will be the primary means for detecting an excluded person, the Finance department shall maintain hard copies of the most current version of the state Exclusion List. Such hard copy master list will be updated and updates will be distributed to the cashier's cage, Security podium and Surveillance Room to be housed for the following departments; within 2 business days (if there have been changes):

- Security
- Marketing
- Surveillance
- Cage/Credit/Player Services
- Slots
- Table Games

Removal from the Exclusion List - Notice of removal from the exclusion list will be received by the Compliance Manager from the PGCB. He or his designee will forward the removal information to Marketing, Security, Surveillance and the Cage/Credit/Players Services.

- Within 2 business days of receiving notice from the PGCB that a patron has been removed from the exclusion list, the exclusion information is removed from the REDACTED by a Surveillance Supervisor or his designee who will also reactivate the account.
- Within 2 business days of receiving notice from the PGCB that a patron has been removed from the exclusion list, the information is recorded in the iView system by a Security Supervisor.

Any excluded person that is removed from the exclusion list whose REDACTED account was created solely due to their placement on the list (i.e. not created due to prior play or other gaming related activity) will remain deactivated in the REDACTED. Such accounts will have an REDACTED comment that reads "account created solely due to exclusion".

Procedures to prevent a self-excluded person from gambling

HCP will prominently post signage at all entrances to its facility indicating that a person who is on the self-exclusion list will be subject to arrest for trespassing under 18 Pa.C.S. § 3503 (relating to criminal trespass) if the person is on the gaming floor, in areas off the gaming floor where slot machine, banking table game, or poker contests or tournaments are conducted, or engaging in gaming activities as set forth in this plan and as provided in **Exhibit F**.

The prohibition against allowing self-excluded persons on the gaming floor or in areas off the gaming floor where slot machine, banking table game, or poker contests or tournaments are conducted does not apply to an individual who is on the self-exclusion list if all of the following apply:

- a. The individual is carrying out the duties of employment or incidental activities related to employment,
- b. HCP's security department and the PGCB have received prior notice,
- c. Access to the gaming floor or in areas off the gaming floor where slot machine, banking table game, or poker contests or tournaments are conducted is limited to the time necessary to complete the individual's assigned duties, and
- d. The individual does not otherwise engage in any gaming activities.

Self Exclusion Program - The PGCB maintains the official self-exclusion list and notifies HCP of additions to or deletions from the list by first class mail or electronically. The notice provided by the PGCB will include the following information concerning a person who has been added to the self-exclusion list:

- a. Name, including any aliases or nicknames.
- b. Date of birth.
- c. Address of current residence.
- d. Telephone number.
- e. Social Security number, when voluntarily provided by the person requesting self-exclusion.
- f. Physical description of the person, including height, weight, gender, hair color, eye color and other physical characteristics that may assist in the identification of the person.
- g. A copy of the photograph taken by the PGCB.
- h. The notice provided to slot machine licensees by the PGCB concerning a person whose name has been removed from the self-exclusion list will include the name and date of birth of the person.

Additions to and deletions from the self-exclusion list will be received from the PGCB by the Compliance Manager. He or his designee will forward the information to Marketing, Security, Surveillance and the Cage/Credit/Players Services within 2 business days of receiving the notice from the PGCB.

- Within 5 business days of receiving notice from the PGCB that a patron has been added to the self-exclusion list,

REDACTED

Employees with access to the self-exclusion list are required to keep the identity of an individual on the self-exclusion list confidential.

Removal from Self Exclusion Program - Notice of removal from the self-exclusion list will be received by the Compliance Manager from the PGCB. He or his designee will forward the removal information to Marketing, Security, Surveillance and the Cage/Credit/Players Services.

- Within 5 business days of receiving notice from the PGCB that a patron has been removed from the self-exclusion list,

REDACTED

Self-Exclusion – General (Applies to the Self-Exclusion and HCP Property Only Self-Exclusion unless otherwise noted)

REDACTED

If a self-excluded patron contacts the security department via telephone requesting a win/loss statement, the patron will be transferred to Cage/Credit/Player Services so that they can be sent a win/loss statement request form; the patron is then responsible for mailing the completed form back to HCP, who will confirm their identity based on the information provided, and will mail them the requested win/loss statement.

If a self-excluded patron comes in person to the property and approaches a security officer at any staffed entrance to the casino floor (but not on the casino floor) to request a win/loss statement, they will be given a win/loss statement request form to complete and mail back to HCP. At no time will the patron be allowed to access the casino floor.

Procedures to prevent intoxicated patrons from gambling

HCP has trained its Slots supervisors, Table Games supervisors, Security, and Valet employees who have patron contact, all Food and Beverage employees who serve alcohol (or manage those who do), and all employees who are authorized to approve credit lines or credit line increases, in either RAMP or TIPS as set forth above which includes procedures designed to prevent serving alcohol to visibly intoxicated gaming patrons and has established these procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.

All employees trained in either RAMP or TIPS are responsible for identifying a potentially intoxicated patron. Visibly intoxicated patrons will be denied entry to the gaming floor, areas off the gaming floor where slot machine, banking table game, or poker contests or tournaments are conducted and beverage outlets on the property by security personnel stationed throughout the property. Security personnel will prevent intoxicated persons from gaming and from remaining on the gaming floor or areas off the gaming floor where slot machine, banking table game, or poker contests or tournaments are conducted. The procedures outlined in the Security Department section below will be followed to ensure that the intoxicated patron does not engage in gaming activities and is provided safe transportation from HCP.

- a. **Security Department** Upon visual observation or notification of any patron identified, or suspected to be visibly intoxicated, a security officer will notify a Security supervisor who shall approach the patron and perform a status check and make a determination if the patron appears to be visibly intoxicated (as set forth in RAMP/TIPS training materials **Exhibit B**).

REDACTED

Details of outreach program (if applicable)

At this time, our program does not include an outreach program. However, the responsible gaming committee will continue to explore possible outreach programs, memberships and sponsorships as they come to the committee's attention.

Posting of Board-approved signs

All required signage relating to responsible gaming will be placed in the appropriate areas after consulting with and receiving approval from PGCB personnel (See "Signage" below). See **Exhibit F**

Other policies and procedures to encourage responsible gambling

HCP does not currently use third party customer lists but Marketing is aware that if such a list is used, the third party's list must be "scrubbed" before it is used to prevent the third party from sending a mailing to an underage, self-excluded or excluded person. Procedures to "scrub" the list will be established and/or approved by Penn National Gaming, Inc. ("PNGI"), HCP's parent

company, and provided to the Director of OCPG for approval prior to the third party list being used.

HCP periodically shall conduct employee and patron awareness events (e.g., employee contests, participating in "problem gambling awareness weeks" and providing reminders in the company newsletters. HCP also trains its employees on handling incidents involving unattended minors.

Moreover, PNGI's responsible gaming monitoring program also requires the Compliance Manager to review each incident involving an exclusion, self-exclusion, minor or alcohol cut-off. All such incidents are documented by security incidents reports which are distributed to the Compliance Manager daily. They are then reviewed during compliance meetings conducted by the Compliance Manager. Currently, these meetings are conducted weekly and include the Directors of Security and Surveillance, and other members of HCP's management as deemed necessary. Through PNGI's responsible gaming monitoring program (which was established and put into effect in 2003), HCP proactively monitors the effectiveness of its training through the interview process and reactively monitors through a review of every responsible gaming-related incident by the Responsible Gaming Committee.

EMPLOYEE TRAINING PROGRAMS

The Employee Responsible Gaming Training Program consists of three tiers as further described below:

Tier 1

The Tier I responsible gaming training program has been developed in conjunction with the Counsel on Compulsive Gambling of Pennsylvania (CCGP). All employees receive this training at Orientation. The CCGP and its employees have extensive experience with issues related to responsible gaming, responsible gaming training and employee training programs. (CV attached as **Exhibit A-5**)

As noted above, the training is part of all employees' orientation. Each employee is also required to take annual refresher Tier I Responsible Gaming Training which is the same as orientation training. As the attached materials reflect (**Exhibit A-1**), the program covers the following relating to compulsive and problem gambling:

- a. Characteristics & symptoms
- b. Relationship to other addictions
- c. Social & economic consequences
- d. Techniques used when compulsive and problem gambling is suspected or identified
- e. Techniques used when discussing compulsive and problem gambling with patrons
- f. Procedures designed to prevent serving alcohol to visibly intoxicated guests
- g. Procedures designed to prevent an intoxicated guest from gambling
- h. Procedures for providing written materials to patrons explaining self-exclusion options
- i. Procedures for employees to report a suspected or identified compulsive or problem gambler to a designated employee

Both orientation and refresher responsible gaming training attendance are tracked manually through sign-in sheets and electronically through a system called PolicyTech. Through PolicyTech, the date and type of training are recorded by the Manager of Training & Development or his or her designee. The Training Department maintains a list of all employees required to take Tier I responsible gaming training (orientation and refresher) and compares that list quarterly (at a minimum) to the records provided via the PolicyTech system of who is required to complete that training. Additionally, a copy of the certificate of completion is kept in each employee's file in Human Resources.

Tier II & Tier III

Additional training on the procedures and techniques set forth in this plan is provided in a less formal manner as reflected in the outlines for the second and third-tier training sessions (made a part of **Exhibit A as A-2 & A-3**) for the following:

- a. Techniques used when discussing compulsive and problem gambling with patrons (Security Supervisors)
- b. Procedures designed to prevent serving alcohol to visibly intoxicated guests (Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping)
- c. Procedures designed to prevent an intoxicated guest from gambling (Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping)
- d. Procedures for providing written materials to patrons explaining self-exclusion options (Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping)
- e. Procedures for removing an excluded person, an underage individual or a person on the self-exclusion list from a licensed facility, including procedures for obtaining the assistance of law enforcement if necessary (Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping)
- f. Procedures to prevent any target mailing from being made to an excluded person or a person on the self-exclusion list more than five business days after receiving notice from the PGCB that the person is on the exclusion or self-exclusion list (Marketing – departmental training)
- g. Procedures to prevent any target mailing relating to gaming from being made to an individual under the age of 21. (Marketing – departmental training)
- h. Procedures for preventing an excluded person, an underage individual or a person on the self-exclusion list from having access to or receiving complimentary services or other like benefits (Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping)
- i. Procedures for preventing an excluded person, an underage individual or a person on the self-exclusion list from cashing checks (Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping)
- j. Procedures to maintain the confidentiality of the identity of individuals suspected or known to be compulsive or problem gamblers (Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping)
- k. Procedures for preventing an individual on the self-exclusion list from obtaining credit (Cage/Credit/Players Services department – departmental training)
- l. Procedures for preventing an individual on the voluntary credit suspension list from obtaining credit (Cage/Credit/Players Services department – departmental training)

Obviously, TIPS and RAMP training provide additional guidance on those items noted above which are related to intoxicated patrons. Moreover, HCP has created specific procedures for entering a self-excluded patron into the REDACTED (**Exhibit A-4**). Finally, each department will have its own internal protocols for reinforcing these procedures as part of the effort to stress the need to execute on responsible gaming procedures.

Additional requirements for training concerning self-exclusion are as follows:

Training on required notifications

As noted above, when an individual on the self-exclusion list is identified in the facility, Security is immediately notified. A Security officer must immediately notify the Pennsylvania State Police, the casino compliance representative on duty and Surveillance. Surveillance will initiate coverage of the individual and maintain that coverage (to the extent possible) until the patron is taken into custody by the State Police. The Compliance Manager and the Director of OCPG shall be notified via e-mail by the security supervisor within 24 hours of the self-excluded individual being identified in the facility.

When an individual on the HCP property-level self-exclusion list is identified in the facility, Security is notified immediately. Security notifies Surveillance which will initiate coverage on the individual. Security will then approach the patron.

Training regarding procedures set forth in this plan is provided to Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping as part of departmental training.

Training on the refusal of wagers and the denial of gaming privileges, including check cashing privileges, extension of credit and comps, to self-excluded individuals

The training identifies that Security is contacted when a self-excluded person is identified at the property. It further identifies that the person is subject to arrest. Specific departmental training on procedures for preventing a person on the self-exclusion list from having access to or receiving complimentary services, receiving winnings (for the state self exclusion program) and from cashing checks or the extension of credit (Cage/Credit/Players Services specific) is provided to Cage/Credit/Player Services, Slots, Table Games and Marketing personnel. Before allowing such a transaction to occur, personnel are required to check the REDACTED to determine whether the person has been flagged in the system.

Training on the prevention of targeted mailings and advertising to self-excluded individuals

Marketing personnel receive training regarding procedures set forth in this plan Marketing personnel receive departmental training regarding the method by which HCP prevents any target mailing from being made to an excluded person or a person on the self-exclusion list more than five business days after receiving notice from the PGCB that the person is on the exclusion or self-exclusion list. The process is set forth above.

Training on the dissemination of materials to patrons explaining self-exclusion options

Training on the dissemination of materials to patrons explaining self-exclusion options and the difference between the statewide self-exclusion list and the property only self-exclusion list as well as the fact that an individual may be on both lists simultaneously is provided Tier I responsible gaming training and is discussed in greater detail in training for Security, Surveillance, Slots, Table Games, Cage/Credit/Players Services, Marketing and all front of house employees for F&B and Housekeeping and in the third-tier training for Security supervisors.

Training on the responsibility to maintain an updated copy of the self-exclusion list and to distribute the list in a timely fashion

Training regarding the self-exclusion list and the procedures as set forth in this plan is conducted during departmental training for the necessary departments as set forth above.

Confidentiality of self-exclusion list and individuals with suspected or known compulsive or problem gambling

As identified in the live or video-based responsible gaming training and provided herein, except for the procedures for reporting suspected or identified compulsive or problem gamblers to designated supervisory employees and procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior, employees are advised that employees shall not discuss or disclose the identity of an individual that he or she suspects has a gambling problem and that the list of self-excluded individuals is not available to all departments as the list is confidential. Employees shall not discuss or disclose the identity of an individual that he or she suspects has a gambling problem except to the extent it is necessary to address problem or compulsive gambling concerns regarding the patron or as required by a PGCB employee. Employees with access to the self-exclusion list are advised that they shall not disclose the identity of individuals on the self-exclusion list to anyone, except as provided herein. Any employee of slots, table games, marketing and casino cage/credit/players services who regularly perform patron transactions REDACTED

SIGNAGE REQUIREMENTS

Signage relating to (1) the legal wagering age, (2) the possession of deadly weapons, (3) the gambling hotline and (4) the possibility of criminal trespass charges for self-excluded individuals shall be placed as set forth in **Exhibit F**. HCP will post at least twenty signs with the statement "Gambling Problem? Call 1-877-565-2112 for help" throughout the casino facility, including with 50 feet of each entrance and exit, within 50 feet of each automated teller machine location, and in other appropriate areas of the facility, as determined by HCP.

- a. Gaming Floor Entrance Signage (within 50' of each entrance and exit of the gaming floor) HCP will prominently post signs bearing the phrases:
 - 1) It is unlawful for any person under 21 years of age to engage in any gaming activities. Individuals violating this prohibition will be removed and may be subject to arrest for criminal trespass under 18 Pa.C.S. § 3503 (relating to criminal trespass).
 - 2) The possession of a deadly weapon, stun gun or other device designed to injure or incapacitate a person by any person within this licensed facility without the express written permission of the Pennsylvania Gaming Control Board is prohibited.
 - 3) It is unlawful for anyone under the age of 21 to enter and remain in any area of the licensed facility where slot machines are operated or the play of table games is conducted. Anyone found to be under the age of 21 and attempting to enter the casino floor will be subject to arrest.
- b. HCP will post signs within 50 feet of all entrances and exits to the facility indicating that:
 - 1) A person who is on the self-exclusion list will be subject to arrest for trespassing under 18 Pa. C.S. § 3503 (relating to criminal trespass) if the person is on the gaming floor or engaging in gaming activities.
 - 2) The possession of a deadly weapon, stun gun or other device designed to injure or incapacitate a person by any person within this licensed facility without the express written permission of the Pennsylvania Gaming Control Board is prohibited.
 - 3) Gambling Problem? Call 1-877-565-2112
- c. Cage/Credit/Players Services Area HCP will prominently post at the casino cage/credit/players services area signs indicating that:

- 1) It is unlawful for any person under 21 years of age to engage in any gaming activities. Individuals violating this prohibition will be removed and may be subject to arrest for criminal trespass under 18 Pa.C.S. § 3503 (relating to criminal trespass).
- 2) The possession of a deadly weapon, stun gun or other device designed to injure or incapacitate a person by any person within this licensed facility without the express written permission of the Pennsylvania Gaming Control Board is prohibited.
- 3) Gambling Problem? Call 1-877-565-2112

d. ATM – TRU (all ATM's within the facility)

- 1) (On each ATM and TRU) HCP shall be prominently post on each Automated Teller Machine, cash dispensing or change machine in the facility the phrase:

i Gambling Problem? Call 1-877-565-2112

All marketing and advertising materials that are offered to the general public, including signs, billboards, print, and radio or television advertisements, will contain the following statement:

- a. Gambling problem? Call 1-877-565-2112.

CHECK CASHING

HCP will not cash third party checks payable to an individual, including Social Security, unemployment insurance, disability payment, public assistance payment or payroll check for a patron. HCP may cash personal checks and checks issued by HCP for gaming purposes.

Personal checks will be cashed only at the Casino Cage. Cashiers and Cage/Credit/Players Services Department Management will only cash personal checks in accordance with the procedures outlined in HCP's approved Accounting and Internal Control Submission and as set forth in this policy (to prevent underage, excluded and self-excluded individuals from cashing checks). No one in HCP management or ownership may authorize an exception to the cashing of only personal checks or checks issued by HCP for gaming purposes.

AMENDMENTS TO THE PLAN

Amendments to this Plan, including self exclusion procedures and procedures to prevent underage violations, shall be submitted to the Director of the OCPG at least thirty (30) days prior to the intended implementation date of the amendment. HCP shall be allowed to implement the amendment on the 30th calendar day following the filing of the amendment unless the Director of the OCPG objects to the amendment within that timeframe.

NOTIFICATION TO DIRECTOR OF OCPG

As noted above, the Director of OCPG shall be notified via e-mail by the security supervisor within 24 hours of a person on the statewide self-exclusion or exclusion list being identified in the facility.

REPORTS - ANNUAL SUMMARY

HCP shall submit an annual summary of its responsible gaming program in accordance with §501a.4.

vigilance, Officers will from time to time note the presence of minors in the facility who are not accompanied by responsible adults.

For the purposes of this policy, an unattended minor will be considered any minor who appears to be under the age of 18 who is unaccompanied by an adult.

When any unattended minor is found in the facility, whenever reasonably practical an employee shall stay with the minor until the arrival of a Security Representative. Security will contact the Pennsylvania State Police, who will take control of the incident upon their arrival.

Together, the Security Department and the PSP will attempt to determine the identity of the minor and his or her parents. If a name is obtained, Security will attempt to determine if the parent is registered in the HCP's player club database to facilitate finding the parent, and once located will escort the responsible party to the PSP office location. Any further action will be the decision of the PSP.

It should be noted that the PSP will be contacted in every instance concerning an unattended minor on the property, to include any children located in vehicles anywhere on HCP property.

EXCLUDED PERSONS

Procedures to prevent an excluded person from gambling, including distribution of and updates to the exclusion list

Training regarding the exclusion list and the procedures as set forth in this plan is conducted during departmental training for the following departments:

- a. Security
- b. Surveillance
- c. Slots
- d. Table Games
- e. Cage/Credit/Players Services
- f. Marketing

The means of identifying an excluded patron are as follows:

- a. While attempting to obtain a players card, patron produces identification and is identified as excluded through REDACTED
- b. Patron attempts a transaction at the cage requiring presentation of identification and is identified as excluded through REDACTED
- c. Patron wins a jackpot or other transaction requiring presentation of identification and is identified as excluded through REDACTED
- d. Patron is identified as excluded through REDACTED during comping process
- e. Patron uses players card in slot machine, thereby alerting Surveillance
- f. Employee recognizes patron as being excluded

When an individual on the statewide exclusion list is identified in the facility, Security is immediately notified. A security supervisor must immediately notify the Pennsylvania State Police, the Casino compliance representative on duty and Surveillance. Surveillance will initiate coverage of the individual and maintain that coverage (to the extent possible) until the person is removed from the property or taken into custody by the State Police. The Director of OCPG shall be notified within 24 hours via e-mail by the security supervisor of the excluded individual being identified in the facility.

When an individual on the HCP property-level exclusion list is identified in the facility, Security is notified immediately. Security notifies Surveillance which will initiate coverage on the individual. Security will then approach the patron. HCP may pursue trespassing charges against an excluded person found at the facility.

Individuals believed to meet the criteria for exclusion

HCP acknowledges that it has a duty to report any individual it believes meets the qualifications for placement on the PGCB's exclusion list as set forth in this plan. Moreover, when observed in the facility, HCP personnel shall follow the notification and surveillance procedures identified in this plan.

ADVERTISING & PROMOTIONS

Advertising

- a. HCP will discontinue as expeditiously as possible the use of a particular advertisement or promotion upon receipt of written notice from the Board that the Board has determined that the use of the particular advertisement or promotion in, or with respect to, the Commonwealth of Pennsylvania could adversely impact the public or the integrity of gaming.
- b. For purposes of this section, the term "advertisement" means marketing materials including signs, billboards, print, radio and advertisements communicated through television, emails or cellular phone text messages and any notice or communication by a slot machine, junket or manufacturer licensee or its agent to the public through broadcasting, publication, mailing or other means of dissemination.
- c. Advertisements used by HCP may not:
 - (1) Contain false or misleading information.
 - (2) Use a font, type size, location, lighting, illustration, graphic depiction or color obscuring any material fact or the statement required under subsection (d).
 - (3) Fail to disclose any material conditions or limiting factors associated with the advertisement.
- d. All marketing and advertising materials that are offered to the general public, including signs, billboards, print, radio or television advertisements, will contain the following statement: "Gambling problem? Call 1-877-565-2112".
- e. HCP will not employ or contract with an individual to persuade or convince a person to engage in gaming or play a specific slot machine or table game at HCP.
- f. The height of the font used for the gambling assistance message in signs, direct mail marketing materials, posters, websites and other print advertisements should be at least the same size as the majority of the text used in the sign, direct mail marketing material, poster or other print advertisement or 2% of the height or width, whichever is greater, of the sign, direct mail marketing material, poster, webpage or other print advertisement, whichever is greater—or as approved by the Director of OCPG.
- g. The height of the font used for the gambling assistance message should be at least 5% of the height or width, whichever is greater, of the face of the billboard or as approved by the Director of OCPG.
- h. For Video and television advertisements (unless otherwise approved by the Director OCPG):

(a) The height of the font used for the gambling assistance message should be at least 2% of the height or width, whichever is greater, of the image that will be displayed.

(b) The gambling assistance message should be visible for the entire time the video or television advertisement is displayed.

- i. An example of an advertisement and a billboard are attached as Exhibit I.
- j. All advertisements on social media sites must include the gambling assistance message. This includes the gambling assistance message on the homepage and profile page of each social media site as well as on each advertisement posted to the social media site. The height of the font used for the gambling assistance message will be the greater of (1) at least the same size as the majority of the text used or (2) 2% of the height or width, whichever is greater, of the webpage or the advertisement posted to the social media site.

Promotions

- a. The complete rules for any promotion currently in progress will be available at the Cage/Credit/Players Services.
- b. Promotions will be conducted pursuant to the approved Internal Controls for promotions.

Required Notifications

At least two (2) business days prior to conducting a promotion, HCP will provide the rules of the promotion to:

1. The Casino Enforcement Office
2. The PGCB Office of Gaming Operations
3. The Department of Revenue

Prohibited Activities

HCP will not knowingly conduct any casino promotion or publish any casino advertisement which:

1. Misrepresents the probability of winning the promotion offer, or is false, misleading or deceptive.
2. Is directed at minors
3. Violates any federal, state or local law

VOLUNTARY CREDIT SUSPENSION

Procedures to ensure that certain individuals may not obtain credit

HCP offers credit at its licensed facility. In order to ensure that individuals on the Voluntary Credit Suspension List ("VCS List") (Attachment K) do not obtain credit, HCP instituted the following procedures.

1. A PGCB casino compliance representative ("CCR") will provide the Compliance Manager or, in his absence, his designee, with the advisories of patrons who have requested Voluntary Credit Suspension. The Compliance Manager or, in his absence, his designee, will within 24 hours, forward the advisory to the Cage/Credit/Players Services Department for processing.

2. The Cage/Credit/Players Services Department will maintain a copy of the VCS List and will ensure that the copy of the list is updated within 24 hours after HCP receives the update(s) from the PGCB. The Cage/Credit/Players Services Department will immediately suspend the credit privileges of any individual upon receipt of notice that the individual has been added to the voluntary credit suspension list.
3. A member of the Cage/Credit/Players Services Department will check the REDACTED for the patron's account and will flag the account to denote credit suspension. As a result, this patron can no longer receive credit from HCP. If the patron does not have an account with HCP, HCP will not create a new account specifically for the patron. However, Cage/Credit/Players Services staff is required to refer to the VCS List before approving any new line of credit to ensure that the applicant is not on the VCS List.
4. A member of the Cage/Credit/Players Services Department will also manually fill out a Voluntary Credit Suspension / Removal Form. The Voluntary Credit Suspension / Removal Form will be filed in the patron's credit file if that patron has a credit account with HCP. If the patron does not have a credit account, the Voluntary Credit Suspension / Removal Form will be attached to HCP's VCS List with the advisory received from the PGCB.
5. A CCR will provide the Compliance Manager, or in his absence, his designee, with the advisories of patrons who have been removed from Voluntary Credit Suspension. The Compliance Manager, or in his absence, his designee, will forward the removal advisory to the Cage/Credit/Players Services Department for processing within 2 business days of receipt.
6. A member of the Cage/Credit/Players Services Department will remove the patron from all HCP's copies of the VCS List within 3 business days of receipt from the PGCB.
7. HCP has chosen, as a matter of policy, not to reinstitute/reactivate/approve a line of credit for any patron who has previously participated in the VCS List.
8. A member of the Cage/Credit/Players Services Department will sign the Voluntary Credit Suspension / Removal Form, including the date and time of removal.
9. A member of the Cage/Credit/Players Services Department will eliminate the credit suspension flag on the patron's account in the REDACTED. If an account in the player track system was created for the purpose of designating the person as on the VCS List, the player's account will be deactivated.
10. A hard copy of the Removal from Voluntary Credit Suspension advisory will be placed in the patron's credit file if they have an account with HCP or in a separate designated Removal file if the patron has no credit account at HCP.
11. The VSC List will be posted in the Cage/Credit/Players Services Department.

Financial Restriction List

HCP has established a personal Financial Restriction List. This list restricts a patron from obtaining casino credit and from cashing checks and obtaining credit card cash advances (provided that the transaction requires a face-to-face interaction with HCP staff). Patrons have a choice of signing up for one year, five years, or lifetime. The restrictions will not be lifted until the patron specifically requests in writing to have the restrictions removed.

Patrons inquiring about the personal Financial Restriction List will be directed to the Cage/Credit/Player Services window to sign up. A Financial Restriction "Flag" will be set in the REDACTED under the patron's account (if the patron has no account, a new account will be created). A master list will be maintained by the Compliance Officer.

Placement on this list does not restrict the patron's ability to wager in HCP's gaming facility. In addition, placement on this list does not prohibit the guest from using automated teller machines, or from performing financial transactions with non-HCP staff (for example, at a financial services window staffed by a third party).



Appendix 37

If a temporary facility is to be licensed, provide details of the temporary facility as well as a plan for how the licensee will transition to a permanent facility, including a date for the completion of the permanent facility.



Appendix 38

As required by §1325 of the Gaming Act, applicant must address each item listed in this section. If an item does not apply, the applicant must state that in response to each item listed. Provide a plan, with details, for the following:

(1) the location and quality of the proposed facility, including, but not limited to, road and transit access, parking and centrality to market service area;

The proposed casino facility would be located at 700 Packer Avenue in Philadelphia, PA. Details concerning road and transit access is provided in **Appendix 34**. Details on market service area is provided in **Appendices 30 and 34**.

(2) the potential for new job creation and economic development which will result from granting a license to the applicant;

The construction phase alone of the project is projected to create over 3,600 jobs with $\frac{3}{4}$ of these jobs being in the City of Philadelphia. After opening, the facility is expected to generate directly and indirectly over 8,100 full time equivalent jobs most of which will be in Philadelphia. Please refer to **Appendix 34** for a detailed economic impact statement which includes detail on job creation.

(3) the applicant's good faith plan to recruit, train and upgrade diversity in all employment classifications in the facility;

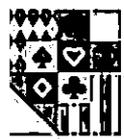
See attached 2013 Diversity Plan developed for Hollywood Casino Philadelphia.

(4) the applicant's good faith plan for enhancing the representation of diverse groups in the operation of its facility through the ownership and operation of business enterprises associated with or utilized by its facility or through the provision of goods or services utilized by its facility and through the participation in the ownership of the applicant. Provide specific information regarding the diversity in ownership of the applicant, i.e. minorities, women;

See attached 2013 Diversity Plan developed for Hollywood Casino Philadelphia.

(5) the applicant's good faith effort to assure that all persons are accorded equality of opportunity in employment and contracting by it and any contractors, subcontractors, assignees, lessees, agents, vendors and suppliers it may employ directly or indirectly;

See attached 2013 Diversity Plan developed for Hollywood Casino Philadelphia.



(6) the history and success of the applicant in developing tourism facility ancillary to gaming development, if applicable to the applicant;

PA Gaming Ventures, LLC (PAGV) has not developed any casino or other facilities. Hollywood Casino Philadelphia will however, be built and managed by Penn National Gaming, Inc (Penn). Penn has successfully built or acquired 29 casino and/or racetrack facilities in over 19 different jurisdictions. Within the last three years Penn has built casinos in Perryville, MD, Kansas City KS, Toledo, OH and Columbus OH all of which are successful. As indicated in Appendix 26a of the Category 2 Application filed by Penn (in association with this project), Penn has extensive experience in operating non-gaming amenities such as restaurants, bars and nightclubs, hotels, entertainment venues, banquet facilities and retail operation

(7) the degree to which the applicant presents a plan for the project which will likely lead to the creation of quality, living-wage jobs and full-time permanent jobs for residents of this Commonwealth generally and for residents of the host political subdivision in particular;

See Item 2 above as well as **Appendix 34** of this application which contains a comprehensive economic impact report for the proposed facility.

(8) the record of the applicant and its developer in meeting commitments to local agencies, community-based organizations and employees in other locations;

PA Gaming Ventures, LLC (PAGV) has not developed any casino or other facilities. Hollywood Casino Philadelphia will however, be built and managed by Penn National Gaming, Inc (Penn). Penn has successfully built or acquired 29 casino and/or racetrack facilities in 19 different jurisdictions. Within the last three years Penn has built casinos in Perryville, MD, Kansas City KS, Toledo, OH and Columbus OH. All have been built as planned and as communicated to the government agencies involved in spite of the difficult economic condition facing the nation as a whole during this period.

(9) the degree to which potential adverse effects which might result from the project, including costs of meeting the increased demand for public health care, child care, public transportation, affordable housing and social services, will be mitigated;

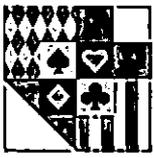
We believe there will be no net negative impacts due to the construction and operation of the facility. We believe the economic contributions from the project to the City and Commonwealth through jobs, taxes and economic development, will be far greater than any increased demands for city services. To help mitigate issues related to problem and compulsive gambling, the property will develop a comprehensive responsible gaming plan similar to what is currently in use at its affiliated Hollywood Casino property located in Grantville PA (see **Appendix 36**).



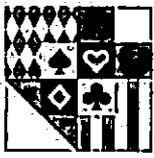
PA Gaming Ventures, LLC – Category 2 Application – Hollywood Casino Philadelphia

- (10) *the record of the applicant and its developer regarding compliance with:*
- (i) federal, state and local discrimination, wage and hour, disability and occupational and environmental health and safety laws as well as*
 - (ii) state and local labor relations and employment laws;*
 - (iii) the applicants record in dealing with its employees and their representative at other locations.*

PA Gaming Ventures, LLC (PAGV) has not developed any casino or other facilities. Hollywood Casino Philadelphia will however, be built and managed by Penn National Gaming, Inc (Penn). Penn owns or operates 29 casino and/or racetrack facilities in 19 different jurisdictions and has few compliance issues related labor law.



2013 Diversity Plan
For
Hollywood Casino Philadelphia



Revised November 2012

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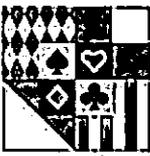
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INTRODUCTION

PA Gaming Ventures, LLC in association with Penn National Gaming Inc. (Penn) has developed this comprehensive Diversity Plan for the construction and operations of the proposed Hollywood Casino Philadelphia (“Hollywood Casino”). The plan is designed not only to provide equal opportunity for vendors, suppliers and employees, but to proactively seek out individuals and businesses from traditionally disadvantaged groups for casino jobs and construction/supplier contracts.

While the Plan refers frequently to “MBE” and “WBE” companies, the inclusive diversity philosophy of Hollywood Casino is intended to be more far reaching than simply the inclusion of minorities and women. Our philosophy is to maximize the concept of inclusiveness in building our employment base and supplier network. This plan will refer to this broader concept of inclusion by the designation “other diverse groups.”



EXECUTIVE SUMMARY

Purpose

This Plan describes the Hollywood Casino's strong commitment to ensure diversity in the construction and operation of the property. The Plan outlines specific procedures aimed at ensuring equal opportunity, and diversity in employment, contracting, operations and in community relations activities. The Plan emphasizes our commitment to diversity as it relates to our employees, our vendors, our business partners and our community. In sum, we appreciate and respect diversity in all aspects of our business operations and we look forward to supporting and participating in the local community as we build a regional engine of economic growth.

Diversity Committee

Hollywood Casino will establish a Diversity Committee to oversee all diversity initiatives for the company if selected to be a Category 2 slot licensee. The Committee will be responsible for advancing the diversity and inclusion strategy by setting strategic direction and managing all aspects of the strategy. The General Manager will chair the Committee, which will be comprised of members of senior management including purchasing and construction personnel.

Our Strategy for Success

Our overall strategy will enable Hollywood Casino to further develop and implement the Plan in order to drive achievement of positive business results and meet the twin goals of ensuring equal opportunity and promoting diversity in a manner that reflects the diversity of the region. The four focus areas of the Plan are:

➤ **Construction**

- Build and enhance relationships within the community to raise awareness and identify qualified MBE/WBE contractors and suppliers.
 - Liaison with Philadelphia's Office of Economic Opportunity (OEO) and the Greater Philadelphia Minority Business Strategic Alliance (GPMBSA) and similar organizations
- Ensure that all qualified vendors are given equal access to bid on planned new construction and any future expansion projects.

➤ **Procurement/Vendor Purchasing**

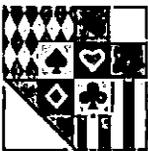
- Build and enhance relationships within the community to raise awareness and identify qualified MBE/WBE vendors.
- Ensure that all qualified vendors are given equal access to bid on contracts and purchases.

➤ **Employment**

- 
- Build and enhance relationships within the community to raise awareness and identify potential candidates from historically disadvantaged groups for employment.
 - Foster an inclusive work environment that results in both personal and business success.
 - Provide training opportunities to give employees the skills and experience necessary to move into supervisory and management positions that offer higher pay and more responsibility.

➤ **Community Involvement**

- Support our community and be a responsible corporate citizen.
- Encourage participation in community initiatives across the entire organization including supporting organizations that serve and represent historically disadvantaged persons and groups.



DEFINITIONS

Diversity refers to the variety of backgrounds and characteristics found in society today; thus it embraces all aspects of human similarities and differences. While we support diversity as an inclusion concept, reality compels us to focus considerable attention on addressing issues related to those individuals and groups that have historically been adversely affected. For purposes of the Plan, diversity specifically focuses on differences among people with respect to age, sex, culture, race, ethnicity religion, color, disability, national origin, ancestry, sexual orientation and veteran status.

Definition of Minority

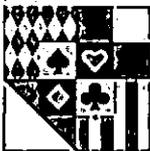
For purposes of MBE's and WBE's, a minority is an individual who is a member of the following ethnic groups: African American, Asian American, Hispanic American, Native American and females regardless of race or ethnicity.

Definition of Participation Plan

An obligation imposed by a licensed entity or applicant as part of its contract with a contractor that requires the contractor to perform the contract through the utilization of minority or women owned business enterprises.

Definition of Minority Business Enterprise ("MBE") and Woman Business Enterprise ("WBE")

Minority and female enterprises that meet the guidelines set by the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity or other similar organization.



CONSTRUCTION

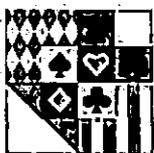
Construction Mission

Inclusion of minority businesses and other diverse groups on bids for major construction projects in the Philadelphia area is an important issue for the substantial local minority community and for Hollywood Casino. We will use a proactive approach to address minority participation during the initial casino build to ensure the inclusion of minority businesses and the successful completion of the project. Once operating we will continue that framework for any future construction projects at the resort.

Good Faith Plan for Minority Construction Participation

There are a number of factors that will be integral to our success in including the minority contractors and suppliers in the initial build-out of Hollywood Casino. We intend to employ the following steps in the construction of this project:

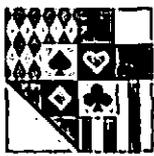
- Selection of third party and in-house construction managers who share our commitment to minority participation. This will be determined through the construction manager interview process.
- Utilization of diversity consultants with knowledge of the Philadelphia construction market.
- Close and continuous coordination with property-level and corporate purchasing departments as well as the Government Affairs department in order to capitalize on their continuous search for qualified minority enterprises.
- Use of State of Pennsylvania, PA Gaming Control Board and other resources and databases to identify capable minority contractors and suppliers.
- Continuation of specific procedures and processes that require construction managers to demonstrate efforts to identify minority contractors and suppliers before work is awarded.
- Effective up front requirements on the part of construction managers to provide minority contractors and suppliers opportunities to bid as well as reporting procedures to track commitments to, and dollars expended for, such minority contractors and suppliers.
- Increased concentration and coordination with construction managers to identify 2nd and 3rd tier subcontractor and supplier opportunities.



- Diligent tracking to ensure the fulfillment of minority contractor and supplier participation plan commitments made by construction managers and 1st tier subcontractors.
- Close coordination with construction managers to improve the on-site labor component of commitments made to minority contractors and suppliers.
- Periodic reporting of our minority commitment and fulfillment results to the Hollywood Casino Diversity Committee, the Pennsylvania Gaming Control Board and other involved parties.

Construction Goal

Our goal is to establish a comprehensive plan for diversity that builds upon the successful record of Penn National Gaming, Inc. in including minority contractors in all of its construction projects across the country. Hollywood Casino and Penn National Gaming, Inc. will work to ensure that the project reflects the Pennsylvania Gaming Control Board's minority participation goals and that these goals reflect the diversity of the region.



PROCUREMENT

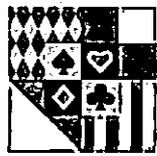
Purchasing Mission

Hollywood Casino will consider quality, service, dependability and price as the main components of any vendor relationship. Further, as a socially responsible organization, we pledge to partner wherever possible with minority and woman vendors, as well as other Diverse Groups, to create a mutually beneficial business climate. Our goal is to ensure that all qualified vendors are given equal opportunity to bid on products and services to be utilized at Hollywood Casino.

Good Faith Plan for Minority Vendor Participation

In support of our diverse vendor purchasing mission, Hollywood Casino will undertake the following initiatives:

- Utilize the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity business directory and database, and resources of Philadelphia's Office of Economic Opportunity (OEO) and the Greater Philadelphia Minority Business Strategic Alliance (GPMBSA) to locate minority and diverse vendors that offer relevant products and services.
- Link our website to those of the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity, OEO and GPMBSA to facilitate awareness and to simplify the application process for potential vendors.
- Create a point of sale brochure entitled *How to Do Business with Hollywood Casino Philadelphia* to summarize our diverse vendor purchasing program.
- Participate in events sponsored by the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity development, OEO, GPMBSA and similar organizations such as seminars, trade shows, and training sessions and reverse trade shows to expand awareness of our minority vendor purchasing program.
- Attend and support Pennsylvania regional minority business fairs organized by the Minority Supplier Diversity Council of Pennsylvania, New Jersey and Delaware, The African-American Chamber of Commerce and area Chambers of Commerce.
- Periodically review the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity list and OEO list of approved vendors for any changes.



- Provide access to the applications and contact information of the Pennsylvania Department of General Services Bureau of Minority and Women Business and OEO. This will provide an opportunity for uncertified potential vendors to become certified.
- Create a mentoring environment that will help new vendors understand the daily workings of the property's operations.
- Request user departments to review their annual budgets for purchasing opportunities, work with the minority database and reach out to those minority suppliers provided by the purchasing staff.
- Establish a reasonable payment plan, agreed upon by both the vendor and the Manager of Purchasing after review of the financial status of diverse vendors.
- Establish a program that will encourage existing minority and other diverse vendors to expand the product lines they sell us through a mentoring process.
- Consider minority and women-owned business enterprises when reviewing Capital Expenditure projects.

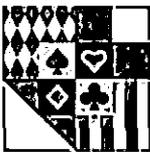
Hollywood Casino will follow these initiatives and develop others as it strives to create an inclusive business environment.

Vendor Requirements

Hollywood Casino endeavors to have all vendors complete a vendor registration packet before any contract or purchase order will be issued, such registration will include information on MBE/WBE status.

Purchasing Objective:

These extensive efforts to identify, train and assist MBE/WBE, as well as other diverse groups of potential vendors should result in a roster of vendors that maximizes diversity and is reasonably reflective of and inclusive of the local community.



EMPLOYMENT

WORKFORCE DIVERSITY

Employment Mission

Recruiting will involve job fairs, various community partnerships to include higher education, chambers of commerce, government agencies and targeted recruiting of minorities and other diverse groups from both new and existing gaming markets. We may also utilize programs and agencies such as the Junior Achievement, Mock Interviews, Soft Skills Presentations, Referral Bonus Programs and local minority agencies such as the African American Chamber of Commerce and Latino Professional organizations to the extent that such organizations are active in the local area. We will also engage statewide minority advocacy organizations for our recruitment efforts.

Advertising for open positions will include a broad range of diverse media sources that may include print, radio, television and internet. To the extent that such sources exist in the local area, we will specifically direct some of this advertising to media sources targeted toward minority groups.

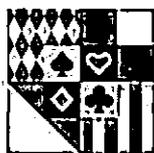
We will publish a bi-weekly Human Resources “Hot Sheet” detailing all position openings as they become open. The Hot Sheets will be sent to area high schools, colleges, employment agencies, minority organizations and social agencies as well as advertised on public sources including our internet website. New casino positions will also be offered to qualified existing resort employees who have interest in them.

Employment Goals

Hollywood Casino will strive to maintain a workforce that reasonably reflects the diverse elements of our community and surrounding area.

TRAINING, DEVELOPMENT & RETENTION EFFORTS

Our education and training efforts will have several areas of focus to help develop a high-functioning, service-oriented diverse workforce. Hollywood Casino will provide best practice training to ensure consistency with our EEO recruiting & hiring practices. We will conduct diversity training designed to foster a welcoming environment for all and reinforce respect in the workplace. We will also provide training to the management team on how to be a culturally sensitive manager with focus on consistency and fairness in the workplace, generational diversity, cultural diversity, and how to manage effective teams in a diverse, service environment. We will integrate diversity and respect into our mandatory orientation program. In addition to this broad, property-wide training, we will provide departmental skill-related training for our new associates. This will allow team members to successfully integrate themselves into their new departments. Building confidence in the ability to competently handle job duties and



establishing an internal departmental support system will increase the chances of retaining new team members.

Team members want to stay with companies that provide development and mobility options. They are loyal to organizations that invest in their careers. We are committed to being that kind of company. We will make the promotion of our employees a first option for upward mobility. We also plan on providing various mobility programs allowing our employees to grow and advance within the company. A Management Apprentice Program will be available for line level team members who aspire to management positions, and are deemed "high potential." Advanced management skill-related courses will be available for our supervisors and managers who aspire to advance and become more proficient in their current positions.

WORKPLACE INCLUSION

Fostering an inclusive environment is the responsibility of all leadership. It is also a journey that will continue moving forward forever. The world in which we live is ever-changing, and the company needs to continue to be aware of these changes and to create a welcoming environment where all team members feel valued and respected.

Our plan is to weave diversity through all areas of the team member environment at Hollywood Casino. We will request of, and focus on, ensuring that our leadership considers diverse perspectives in decisions that affect our team members. Seeking input from everyone and remembering that creativity is driven by a diversity of experiences and such diversity assists in achieving better overall decisions. We want to provide an environment that inspires and engages team members to reach their full career potential.

We will challenge Hollywood Casino managers to truly get to know and learn about their team members. Discovering unique skills and talents will assist with developing creative solutions, plus build loyalty between managers and their team members. We will also ask that managers share their own personal skills and talents to create two way dialogues going both up and down the organization.

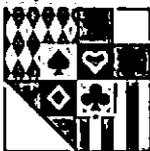
Overall, we will strive to create the awareness that diversity is not just another initiative. Rather, it is a way of doing business and if integrated into everything we do, will assist us in not only becoming the employer of choice but also the casino of choice for our customers. A diverse employee base better understands our diverse guest base, their cultural sensitivities and expectations. Such understanding enhances the guest experience and thus satisfaction which will lead to greater business success for the resort its employees and its vendors.

COMMUNITY AFFAIRS/CHARITABLE CONTRIBUTIONS

Hollywood Casino and Penn Partnership - 35 Years of History in Supporting the Community

Hollywood Casino Philadelphia has partnered with Penn National Gaming, Inc. whose corporate office is based in Wyomissing Pennsylvania. Penn National will construct and manage the operation. Hollywood Casino through its association with Penn will become an even more involved corporate citizen in the state of Pennsylvania. The Hollywood Casino/Penn partnership will leverage our corporate level involvement in high profile initiatives. Penn National Gaming, Inc. has a long standing tradition of supporting Central Pennsylvania community initiatives and Hollywood Casino Philadelphia, partnered with Penn, will expand that involvement to the greater Philadelphia metro area.

See also **Appendix 45, Item 8** from the *PA Gaming Ventures LLC Category 2 Application* for information showing that the principals of have a long history of meeting commitments to local agencies, community - based organizations and employees.



COMMITMENT

PA Gaming Ventures Inc. (Hollywood Casino Philadelphia) and its Managing Member, Penn National Gaming represent a team committed to developing a high performance, inclusive work environment that reflects the diversity of our community. We will strive to create a company culture where all ideas and all contributions are valued no matter how or from whom they may originate. We will actively seek out employees and vendors from traditionally disadvantaged groups to staff, build and supply the facility. Our commitment to making inclusiveness the foundation for our culture is driven not only from our desire to enhance our community, but also because such commitment supports a sound business strategy. This diverse working culture includes not only our valued workforce, but also offers opportunities for broad participation to diverse groups in the procurement of goods and services.



Appendix 39

Provide information demonstrating adequate financing for the proposed facility and the terms of financing including payback period.

REDACTED

Appendix 40

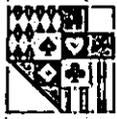
Provide business and economic development plans and timetables, projected debt service expenses, projected EBITDA and internal rate of return, projected annual gross terminal revenue, projected operating and capital expenses and defined gaming market and projected visitation.

REDACTED



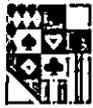
Appendix 41

Provide letters of reference from law enforcement agencies having jurisdiction in the applicant's and principal's main place of residence and place of business indicating that the agency does not have any pertinent information relating to the applicant or its principals. If the law enforcement agency has information pertaining to the applicant or its principals, the letter shall specify the details of the information. If no letters are received within 30 days of the request, the applicant or principal may submit a sworn or affirmed statement that the applicant or principal is a citizen in good standing in his jurisdiction of residence and primary place of business.



Appendix 42

If the applicant has held a gaming license in any jurisdiction, provide a letter of reference from the gaming or casino enforcement or regulatory agency in the other jurisdiction, specifying the experiences of the agency with the applicant, the applicant's associates and the applicant's gaming operation. If no letters are received within 30 days of the request, the applicant or principal may submit a sworn or affirmed statement that the applicant's operation is in good standing with the regulatory agency.



Appendix 43

Provide an original payment bond or an original irrevocable letter of credit that includes a draw certificate, at the applicant's option, guaranteeing the applicant's payment of the slot machine license fee required by §1305 of the Gaming Act.

REDACTED



Appendix 44

Provide a chart of existing gaming service providers including the name, address, phone and tax identification number of the gaming service providers, total dollar amount of business with gaming service providers in the past twelve (12) months and total dollar amount of business expected to be conducted with gaming service providers in the next twelve (12) months.*

**Gaming service providers is defined in 58 Pa. Code §401A.3*





Appendix 45

Provide a summary of all persons who hold an ownership or other beneficial interest in the applicant and any such interest in any of its principal affiliates or principal entities required to be licensed or permitted in Pennsylvania; provided, however, if any of the entities are publicly traded, only interests equal to or exceeding five percent must be disclosed. Ownership interest should be provided in a manner consistent with the ownership interest report found on the Board's website under licensure/reports and general information.

Please refer to **Schedule 10** and **Appendix 18**.