

Appendix 45 (3)

(3) THE APPLICANT'S GOOD FAITH PLAN TO RECRUIT, TRAIN AND UPGRADE DIVERSITY IN ALL EMPLOYMENT CLASSIFICATIONS IN THE FACILITY;

LADY LUCK-NEMACOLIN DIVERSITY PLAN

Managing and gaining the benefits of a diverse workforce has been a strength of Isle for many years. We recognize the value that diversity offers and it has been critical to our success as we operate in 6 different states with differences even in the jurisdictions within those states. Until recently we also had locations in the UK and the Bahamas and therefore are very familiar with working within an environment that is rich with diversity.

Role of the Manager of Lady Luck-Nemacolin

Pursuant to the Management Agreement, employees of the facility will be employees of IOC-PA, LLC ("Isle") and Isle will procure the goods and services necessary to operate the facility. As part of these roles, Isle will continue its and Nemacolin Woodlands Resort's longstanding commitment to diversity in the work place and development of minority and women-owned businesses. This diversity and hiring plan sets forth how Isle will advance those interests. At the appropriate times, Isle will also prepare a report on these employee recruitment, hiring and contracting activities at the facility that complies with Section 1212(a.1) of Title 4 of the Pennsylvania Consolidated Statutes.

Regulatory Commitment

To comply with Title VII of the Civil Rights Act of 1964 and all other local, state, and federal laws and regulations pertaining to equal employment opportunity as well as subsequent guidelines established by the Equal Employment Opportunity Commission.

To take affirmative action through programs, processes and activities to insure our employment statistical demographics meet and/or exceed the employment availability demographics at all levels of employment in the communities in which we conduct business and employ people.

To establish and develop a commitment to strive to ensure the growth and development of minority and female-owned businesses, the property and management team will have strong results-oriented goals for the use of minority and female vendors, suppliers, services, trade, and construction contractors.

We will do this by:

1. Tracking the total number of hires and employment offers made, including diversity information on all potential hires and new hires such as race, gender, and residence of individuals hired or offered employment.
2. Placing the Equal Employment information on any and all recruitment advertising.
3. Placing recruitment advertising in outlets that target diverse populations.
4. Participating in career fairs that target diverse population.
5. Annually reviewing any and all information pertaining to diversity to ensure that we are meeting goals as they relate to recruitment and employment.

Who This Covers

Isle provides equal employment opportunities for all persons without regard to race, creed, color, religion, gender, age, affectional preference, disability, national origin, veteran status, marital status, disability related to childbirth or pregnancy, membership or activity in any local commission, citizenship status or status with regard to public assistance. This commitment applies to, but is not limited to, recruitment, recruitment adverting, hiring, job assignment, promotion, compensation, benefits, training, transfer, layoff, return from layoff, reclassification, termination, demotion and company sponsored education, social and recreational programs.

Who is Responsible

The overall responsibility for equal opportunity in employment, training, compensation, promotion, transfers, terminations, hiring, layoffs, purchasing, and all other areas of business is that of the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Vice-President of Human Resources, Vice-President of Marketing and Executive Vice- President and General Counsel, Vice-President of Operations, as well as General Managers and Directors of Isle.

Communication

The Department of Labor/Equal Employment Opportunity Commission notice/poster will be posted at all Lady Luck-Nemacolin locations where interviewing and hiring takes place.

Isle will publish the corporation's commitment to diversity on Equal Employment Opportunity in all appropriate venues to include:

1. Employee handbook
2. Recruitment advertisements
3. Career Fair materials
4. Internal job postings

Recruitment and Selection

Isle will:

- Give fair and equal consideration to applicants in all qualifying interviews and tests. Minority or female applicants shall not be required to possess qualifications for any position more exacting than those required of incumbents unless the nature of the position has changed for good business reasons.
- Include in all internal and external employment advertising the statement: "Equal Opportunity Employer" and exclude any reference to race, color, creed, disability, religion, sex, age, or national origin.
- Distribute information on all appropriate job openings to area agencies, which can assist with dissemination of the information to minority and female potential applicants.

Promotions, Layoffs, Transfers, Demotions

The Director of Human Resources at Lady Luck-Nemacolin and the Corporate Sr. Director of Human Resources will be the focal points for guidance and compliance including, the following assurance:

- Minority and female team members are included in any inventory or pool of team members who are qualified for management,

technical, administrative or supervisor positions and to insure the same team members are given consideration equal to that of all applicants.

- Should such become necessary, decisions concerning team member demotions, layoffs, and terminations shall be reviewed periodically to assure they are based on factors other than race, color, religion, sex, age, gender, disability or national origin.
- Conduct reviews and assessments of training and educational needs of all team members and actively encourage minority and female team members to increase and upgrade their skill levels to enhance their employability.

Compensation and Benefits

All compensation and benefits programs and practices will be applied to team members in relationship to their jobs classification or grade without any concerns for race, creed, color, age, gender, affectional preference, disability, veterans status, marital status, disability related to pregnancy or childbirth, citizenship status, membership or activity in local commissions, status with regard to public assistance or national origin.

We will conduct reviews and assessments of training and educational needs of all team members to increase and upgrade their skill levels to enhance their employability.

Facilities

Lady Luck-Nemacolin will be required to maintain physical facilities (restrooms, lounges, rest areas, etc.) that are handicap accessible and provide for team members of both sexes.

All work areas, lunchrooms, restrooms, recreational and/or social facilities will be maintained on a non-segregated basis.

Documentation and Record Keeping

1. Under section 481.2. Definitions, completing the annual EEO-1 report that includes, *the ethical/racial categories in employer survey reports required by the United States Equal Opportunity Commission and the Office of Federal Contract Compliance Programs of the United States*

Department of Labor under section 709 of the Civil Rights Act of 1964 or by subsequent amendments to the Federal Act.

2. A file on all affirmative actions taken by the property will be maintained by the Human Resources Department. This file will include a record of both written and verbal contacts made with minority and female organizations, schools, colleges, agencies, and other applicant sources.
3. Copies of employment advertisements and business solicitation advertisements will be maintained for 3 years.
4. Each manager with hiring, promotional and/or budgeting responsibilities for goods and services will be rated on their annual review as to goal accomplishment.
5. The Vice-President of Human Resources, General Counsel, Property Director of Human Resources and selected outside counsel are responsible for Isle's position with regard to any formal charges of discrimination filed through any government agency. The Lady Luck-Nemacolin Director of Human Resources will be responsible for notification and reporting any and all such charges to the Corporate Sr. Director of Human Resources.

Minority and Female-Owned Business Development

1. Isle has an objective to include minority and female-owned businesses in every aspect of vendor, suppliers, and services, including professional services, trades, and construction contracts, which are available to bidders for conducting business with Isle of Capri Casinos Inc.
2. During the construction and renovation of the facility, Isle will also encourage its contractors to use minority and women-owned subcontractors and major material suppliers where available. Isle will encourage this through specific contract language with these entities.
3. Consideration will be given to minority and female-owned companies when bids are equal or within 5% of low bid. The final decision on this variance is that of the General Manager, keeping in mind Isle's commitment and goals for minority and female-owned business development.

Appendix 45 (4)

(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;

LADY LUCK-NEMACOLIN DIVERSITY PLAN

Managing and gaining the benefits of a diverse workforce has been a strength of Isle for many years. We recognize the value that diversity offers and it has been critical to our success as we operate in 6 different states with differences even in the jurisdictions within those states. Until recently we also had locations in the UK and the Bahamas and therefore are very familiar with working within an environment that is rich with diversity.

Role of the Manager of Lady Luck-Nemacolin

Pursuant to the Management Agreement, employees of the facility will be employees of IOC-PA, LLC ("Isle") and Isle will procure the goods and services necessary to operate the facility. As part of these roles, Isle will continue its and Nemacolin Woodlands Resort's longstanding commitment to diversity in the work place and development of minority and women-owned businesses. This diversity and hiring plan sets forth how Isle will advance those interests. At the appropriate times, Isle will also prepare a report on these employee recruitment, hiring and contracting activities at the facility that complies with Section 1212(a.1) of Title 4 of the Pennsylvania Consolidated Statutes.

Regulatory Commitment

To comply with Title VII of the Civil Rights Act of 1964 and all other local, state, and federal laws and regulations pertaining to equal employment opportunity as well as subsequent guidelines established by the Equal Employment Opportunity Commission.

To take affirmative action through programs, processes and activities to insure our employment statistical demographics meet and/or exceed the employment availability demographics at all levels of employment in the communities in which we conduct business and employ people.

To establish and develop a commitment to strive to ensure the growth and development of minority and female-owned businesses, the property and management team will have strong results-oriented goals for the use of minority and female vendors, suppliers, services, trade, and construction contractors.

We will do this by:

1. Tracking the total number of hires and employment offers made, including diversity information on all potential hires and new hires such as race, gender, and residence of individuals hired or offered employment.
2. Placing the Equal Employment information on any and all recruitment advertising.
3. Placing recruitment advertising in outlets that target diverse populations.
4. Participating in career fairs that target diverse population.
5. Annually reviewing any and all information pertaining to diversity to ensure that we are meeting goals as they relate to recruitment and employment.

Who This Covers

Isle provides equal employment opportunities for all persons without regard to race, creed, color, religion, gender, age, affectional preference, disability, national origin, veteran status, marital status, disability related to childbirth or pregnancy, membership or activity in any local commission, citizenship status or status with regard to public assistance. This commitment applies to, but is not limited to, recruitment, recruitment advertising, hiring, job assignment, promotion, compensation, benefits, training, transfer, layoff, return from layoff, reclassification, termination, demotion and company sponsored education, social and recreational programs.

Who is Responsible

The overall responsibility for equal opportunity in employment, training, compensation, promotion, transfers, terminations, hiring, layoffs, purchasing, and all other areas of business is that of the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Vice-President of Human Resources, Vice-President of Marketing and Executive Vice-President and General Counsel, Vice-President of Operations, as well as General Managers and Directors of Isle.



Communication

The Department of Labor/Equal Employment Opportunity Commission notice/poster will be posted at all Lady Luck-Nemacolin locations where interviewing and hiring takes place.

Isle will publish the corporation's commitment to diversity on Equal Employment Opportunity in all appropriate venues to include:

1. Employee handbook
2. Recruitment advertisements
3. Career Fair materials
4. Internal job postings

Recruitment and Selection

Isle will:

- Give fair and equal consideration to applicants in all qualifying interviews and tests. Minority or female applicants shall not be required to possess qualifications for any position more exacting than those required of incumbents unless the nature of the position has changed for good business reasons.
- Include in all internal and external employment advertising the statement: "Equal Opportunity Employer" and exclude any reference to race, color, creed, disability, religion, sex, age, or national origin.
- Distribute information on all appropriate job openings to area agencies, which can assist with dissemination of the information to minority and female potential applicants.

Promotions, Layoffs, Transfers, Demotions

The Director of Human Resources at Lady Luck-Nemacolin and the Corporate Sr. Director of Human Resources will be the focal points for guidance and compliance including, the following assurance:

- Minority and female team members are included in any inventory or pool of team members who are qualified for management, technical, administrative or supervisor positions and to insure the same team members are given consideration equal to that of all applicants.

- Should such become necessary, decisions concerning team member demotions, layoffs, and terminations shall be reviewed periodically to assure they are based on factors other than race, color, religion, sex, age, gender, disability or national origin.
- Conduct reviews and assessments of training and educational needs of all team members and actively encourage minority and female team members to increase and upgrade their skill levels to enhance their employability.

Compensation and Benefits

All compensation and benefits programs and practices will be applied to team members in relationship to their jobs classification or grade without any concerns for race, creed, color, age, gender, affectional preference, disability, veterans status, marital status, disability related to pregnancy or childbirth, citizenship status, membership or activity in local commissions, status with regard to public assistance or national origin.

We will conduct reviews and assessments of training and educational needs of all team members to increase and upgrade their skill levels to enhance their employability.

Facilities

Lady Luck-Nemacolin will be required to maintain physical facilities (restrooms, lounges, rest areas, etc.) that are handicap accessible and provide for team members of both sexes.

All work areas, lunchrooms, restrooms, recreational and/or social facilities will be maintained on a non-segregated basis.

Documentation and Record Keeping

1. Under section 481.2. Definitions, completing the annual EEO-1 report that includes, *the ethical/racial categories in employer survey reports required by the United States Equal Opportunity Commission and the Office of Federal Contract Compliance Programs of the United States Department of Labor under section 709 of the Civil Rights Act of 1964 or by subsequent amendments to the Federal Act.*



2. A file on all affirmative actions taken by the property will be maintained by the Human Resources Department. This file will include a record of both written and verbal contacts made with minority and female organizations, schools, colleges, agencies, and other applicant sources.
3. Copies of employment advertisements and business solicitation advertisements will be maintained for 3 years.
4. Each manager with hiring, promotional and/or budgeting responsibilities for goods and services will be rated on their annual review as to goal accomplishment.
5. The Vice-President of Human Resources, General Counsel, Property Director of Human Resources and selected outside counsel are responsible for Isle's position with regard to any formal charges of discrimination filed through any government agency. The Lady Luck-Nemacolin Director of Human Resources will be responsible for notification and reporting any and all such charges to the Corporate Sr. Director of Human Resources.

Minority and Female-Owned Business Development

1. Isle has an objective to include minority and female-owned businesses in every aspect of vendor, suppliers, and services, including professional services, trades, and construction contracts, which are available to bidders for conducting business with Isle of Capri Casinos Inc.
2. During the construction and renovation of the facility, Isle will also encourage its contractors to use minority and women-owned subcontractors and major material suppliers where available. Isle will encourage this through specific contract language with these entities.
3. Consideration will be given to minority and female-owned companies when bids are equal or within 5% of low bid. The final decision on this variance is that of the General Manager, keeping in mind Isle's commitment and goals for minority and female-owned business development.

Appendix 45 (5)

(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;

LADY LUCK-NEMACOLIN DIVERSITY PLAN

Managing and gaining the benefits of a diverse workforce has been a strength of Isle for many years. We recognize the value that diversity offers and it has been critical to our success as we operate in 6 different states with differences even in the jurisdictions within those states. Until recently we also had locations in the UK and the Bahamas and therefore are very familiar with working within an environment that is rich with diversity.

Role of the Manager of Lady Luck-Nemacolin

Pursuant to the Management Agreement, employees of the facility will be employees of IOC-PA, LLC ("Isle") and Isle will procure the goods and services necessary to operate the facility. As part of these roles, Isle will continue its and Nemacolin Woodlands Resort's longstanding commitment to diversity in the workplace and development of minority and women-owned businesses. This diversity and hiring plan sets forth how Isle will advance those interests. At the appropriate times, Isle will also prepare a report on these employee recruitment, hiring and contracting activities at the facility that complies with Section 1212(a.1) of Title 4 of the Pennsylvania Consolidated Statutes.

Regulatory Commitment

To comply with Title VII of the Civil Rights Act of 1964 and all other local, state, and federal laws and regulations pertaining to equal employment opportunity as well as subsequent guidelines established by the Equal Employment Opportunity Commission.

To take affirmative action through programs, processes and activities to insure our employment statistical demographics meet and/or exceed the employment availability demographics at all levels of employment in the communities in which we conduct business and employ people.

To establish and develop a commitment to strive to ensure the growth and development of minority and female-owned businesses, the property and management team will have strong results-oriented goals for the use of

minority and female vendors, suppliers, services, trade, and construction contractors.

We will do this by:

1. Tracking the total number of hires and employment offers made, including diversity information on all potential hires and new hires such as race, gender, and residence of individuals hired or offered employment.
2. Placing the Equal Employment information on any and all recruitment advertising.
3. Placing recruitment advertising in outlets that target diverse populations.
4. Participating in career fairs that target diverse population.
5. Annually reviewing any and all information pertaining to diversity to ensure that we are meeting goals as they relate to recruitment and employment.

Who This Covers

Isle provides equal employment opportunities for all persons without regard to race, creed, color, religion, gender, age, affectional preference, disability, national origin, veteran status, marital status, disability-related to childbirth or pregnancy, membership or activity in any local commission, citizenship status or status with regard to public assistance. This commitment applies to, but is not limited to, recruitment, recruitment advertising, hiring, job assignment, promotion, compensation, benefits, training, transfer, layoff, return from layoff, reclassification, termination, demotion and company sponsored education, social and recreational programs.

Who is Responsible

The overall responsibility for equal opportunity in employment, training, compensation, promotion, transfers, terminations, hiring, layoffs, purchasing, and all other areas of business is that of the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Vice-President of Human Resources, Vice-President of Marketing and Executive Vice-President and General Counsel, Vice-President of Operations, as well as General Managers and Directors of Isle.



Communication

The Department of Labor/Equal Employment Opportunity Commission notice/poster will be posted at all Lady Luck-Nemacolin locations where interviewing and hiring takes place.

Isle will publish the corporation's commitment to diversity on Equal Employment Opportunity in all appropriate venues to include:

1. Employee handbook
2. Recruitment advertisements
3. Career Fair materials
4. Internal job postings

Recruitment and Selection

Isle will:

- Give fair and equal consideration to applicants in all qualifying interviews and tests. Minority or female applicants shall not be required to possess qualifications for any position more exacting than those required of incumbents unless the nature of the position has changed for good business reasons.
- Include in all internal and external employment advertising the statement: "Equal Opportunity Employer" and exclude any reference to race, color, creed, disability, religion, sex, age, or national origin.
- Distribute information on all appropriate job openings to area agencies, which can assist with dissemination of the information to minority and female potential applicants.

Promotions, Layoffs, Transfers, Demotions

The Director of Human Resources at Lady Luck-Nemacolin and the Corporate Sr. Director of Human Resources will be the focal points for guidance and compliance including, the following assurance:

- Minority and female team members are included in any inventory or pool of team members who are qualified for management, technical, administrative or supervisor positions and to insure the same team members are given consideration equal to that of all applicants.

- Should such become necessary, decisions concerning team member demotions, layoffs, and terminations shall be reviewed periodically to assure they are based on factors other than race, color, religion, sex, age, gender, disability or national origin.
- Conduct reviews and assessments of training and educational needs of all team members and actively encourage minority and female team members to increase and upgrade their skill levels to enhance their employability.

Compensation and Benefits

All compensation and benefits programs and practices will be applied to team members in relationship to their jobs classification or grade without any concerns for race, creed, color, age, gender, affectional preference, disability, veterans status, marital status, disability related to pregnancy or childbirth, citizenship status, membership or activity in local commissions, status with regard to public assistance or national origin.

We will conduct reviews and assessments of training and educational needs of all team members to increase and upgrade their skill levels to enhance their employability.

Facilities

Lady Luck-Nemacolin will be required to maintain physical facilities (restrooms, lounges, rest areas, etc.) that are handicap accessible and provide for team members of both sexes.

All work areas, lunchrooms, restrooms, recreational and/or social facilities will be maintained on a non-segregated basis.

Documentation and Record Keeping

1. Under section 481.2. Definitions, completing the annual EEO-1 report that includes, *the ethical/racial categories in employer survey reports required by the United States Equal Opportunity Commission and the Office of Federal Contract Compliance Programs of the United States Department of Labor under section 709 of the Civil Rights Act of 1964 or by subsequent amendments to the Federal Act.*