



Greenwood Gaming and Entertainment, Inc.

Diversity and Inclusion Plan

December 2009 Update

Submitted by:

Ronald W. Davis

Chief Diversity Officer and Director of Community Development

TABLE OF CONTENTS

- A. Executive Summary
- B. Definitions
- C. Statement of Goals
- D. Diversity in the Workplace
- E. Diversity and Our Guests
- F. Diversity in Community Giving
- G. Diversity in Business Partnerships
- H. Diversity and Inclusion Committee
- I. Diversity and Community Development Director
- J. Plan Measurement and Evaluation

EXECUTIVE SUMMARY

Our mission is to maintain an open and welcoming atmosphere where employees, guests, business partners and the community at large feel comfortable and respected. The Diversity and Inclusion plan's focus is to connect our business to real opportunities through outreach and partnership.

- We value diversity in the workplace. The best ideas and efforts come not from one individual, but when drawn from many different perspectives and viewpoints. We strive to capitalize on the varied experiences, ideas and knowledge that each employee brings to the business. We reach out to recruit directly from universities and colleges in the region and attend job fairs to find the best talent. We also contact state and local job placement organizations and services. We will target advertising for job vacancies in media representing historically under-represented groups.
- We value diversity in our business partnerships. Our goal is to ensure that there is an equal opportunity for all vendor and contractor partners to participate in our business, and share in our success. We have joined the Minority Supplier Development Council. MSDC is an organization that assists MBE and WBE owned businesses in the vendor certification process. Our outreach extends to:
 1. The African American Chamber of Commerce
 2. The Asian American Chamber of Commerce
 3. The Hispanic Chamber of Commerce
 4. The Women's Business Council
 5. The Bensalem Gaming Advisory Board
 6. YWCA of Lower Bucks County
 7. Lower Bucks Chamber of Commerce

We meet regularly with these organizations that provide vendor and contractor outreach opportunities. Since January 2008, Greenwood Gaming and Entertainment, Inc. has conducted 260 vendor meetings with \$4,000,000 awarded to MBE and WBE vendors.

Furthermore in 2009, Greenwood Gaming and Entertainment, Inc. has awarded \$30,000,000 in contracts to MBE and WBE construction contractors.

- Greenwood Gaming and Entertainment recognizes and values the diversity of our customers. We understand that customers can choose from among many entertainment destinations in the Delaware Valley, and we are honored that they choose our casino and racetrack. We pledge that the quality of service and attention they receive while visiting us will serve as proof of our appreciation for their patronage.

- We welcome the opportunity to be an active member of the community. The success and well-being of our business directly impacts the success and well-being of our community. We support local and regional charitable organizations in four areas:
 - Community
 - Health
 - Education
 - Senior Organizations

We are proud to work in partnership with civic and charitable organizations. Since 2006 Greenwood Gaming and Entertainment, Inc. has contributed 7 million dollars to charitable organizations.

Greenwood Gaming and Entertainment, Inc. is an advocate for a strong and vital business community. We believe that strong partnerships work!

DIVERSITY DEFINITIONS

Diversity refers to the variety of backgrounds and characteristics found in society today; thus it embraces all aspects of human similarities and differences. Diversity refers specifically to historically under-represented groups and differences with respect to age, culture, race, ethnicity, religion, color, disability, national origin, ancestry, sexual orientation and veteran's status. Business definitions of diversity are as follows:

DIS Disabled Business Enterprise

DIS are businesses that are at least 51% owned and controlled by a disabled individual.

DVET Disabled Veterans Business Enterprise

DVET are businesses that are at least 51% owned and controlled by one or more disabled veterans.

MBE Minority Owned Business Enterprise

MBE businesses are at least 51% owned and controlled by individuals belonging to certain ethnic minority groups. Ethnic minorities are United States citizens who are Asian, African American, Hispanic or Native American.

M/WBE Minority Women Owned Business Enterprise

M/WBE businesses are at least 51% owned and controlled by citizens belonging to certain minority groups and/or a person of female gender.

VET Veteran Owned Business Enterprise

VET businesses are at least 51% owned by individuals who are veterans of the U.S. Armed Forces.

WBE Women Owned Business Enterprise

WBE businesses are at least 51% owned and controlled by a person who is female in gender.

STATEMENT OF GOALS

To establish a diverse workforce by ensuring consistency, fairness and inclusion in the recruitment, selection and the career development process.

To promote diversity by ensuring equal opportunity in the procurement of contractors, sub-contractors, assignees, lessees, agents, vendors and suppliers.

To create an open and welcome atmosphere at all of our properties where employees, guests and vendors feel comfortable and welcome.

To actively seek out minority and women and other historically under-represented groups to provide opportunities for them to bid on providing services and/or supplies.

To be a strong financial supporter of a diverse number of worthwhile community charities and non-profit organizations through our community giving program.

DIVERSITY IN THE WORKPLACE

The four primary areas of diversity effectiveness are awareness, fairness, inclusion and leverage. Greenwood Gaming & Entertainment, Inc. seeks to provide leadership in all of these areas of diversity and to encourage and support senior executives as they promote these goals in their areas of responsibility.

We encourage them to examine racial, ethnic, cultural, gender and age changes in both the local community and the workforce; to understand the importance and appreciation for people; examine stereotypes and prejudices and how they impact behavior and how to interact more effectively with people from all walks of life. We will also include examination of special needs, veterans and all historically under-represented groups.

The Human Resources and Legal departments will provide appropriate support and assistance but Greenwood Gaming and Entertainment, Inc. looks to all of its senior executives to incorporate diversity into their areas of responsibility within our workforce. Absolute impartiality is required when recruiting, selecting and orienting new hires. The same is expected when considering candidates for pay reviews, further training and promotions.

Recruitment

Greenwood Gaming and Entertainment, Inc., through its affiliated employer companies, is an Equal Opportunity Employer.

Our policy supports our company commitment to recruit, retain and develop a workforce that reflects both its local community and customer base. It contributes to a well-rounded workplace where differences are respected and appreciated.

In addition to Greenwood Gaming and Entertainment's traditional ways of seeking new candidates, we will undertake the following outreach strategies:

1. Greenwood Gaming and Entertainment will work with the African American Chamber of Commerce, the Hispanic Chamber of Greater Philadelphia, and the Asian American Chamber to create awareness of employment opportunities.
2. Development of close relationships with federal, state and local agencies and minority hiring programs to increase opportunities for minority applicants.
3. Regular monitoring by Human Resources to ensure that our diversity targets and benchmarks reflect our community. This includes tracking applicant flow by inserting a survey in the application process asking applicants to voluntarily indicate race/ethnic origin.
4. Cultivation of historically black colleges and universities to make them aware of the many career opportunities in gaming.
5. Attendance at job fairs in Southeastern Pennsylvania, with an emphasis on those that target minorities and women.

Selection and Orientation

All Greenwood Gaming and Entertainment employees who are responsible for recruitment and selection will be educated in lawful employment making decisions.

We will ensure that all employment literature is clear and understandable including:

1. Website information available online at Philadelphiaparkcasino.com
2. Any collateral including written tests that may be used.
3. Post hire paperwork
 - Employee Handbooks
 - 401 K and other Employee Benefit Information
 - Union Literature
 - Medical Health Information
4. Newsletters and company wide communications

Training

Greenwood Gaming and Entertainment will conduct ongoing training for department heads and senior staff on the different training methods to reach diverse learning styles. We will ensure that training curriculum materials account for a diverse workforce that is inclusive and engaged. Multi-cultural appreciation is paramount to connecting with a diverse workforce.

Employee Relations

When possible Greenwood Gaming and Entertainment, Inc. will recognize and promote special dates, events and holidays such as:

- African American History Month
- Women's History Month
- Asian American Heritage Month
- Gay and Lesbian Pride Month
- Hispanic Heritage Month
- American Indian Heritage Month

We will also publicize such events in the company newsletter, message boards and the company's web pages.

1. Coordinate the special celebrations with the Food & Beverage department so appropriate celebratory meals will be available.
2. Host diversity focused events where employees can bring food from their culture to share with others.
3. Designate an area where employees can display artifacts or information about their cultures.
4. Diversity quizzes with prizes and company newsletter.

Career Development

Our efforts in career development will include:

- Regularly perform a survey of all pay increases/promotions to measure the success of the diversity initiative.
- Track and review the pay increases/promotions within each department.
- Hold managers accountable for implementing the diversity plan in their respective departments.

DIVERSITY AND OUR GUESTS

Our goal is to market and advertise our company to create an inviting atmosphere at our properties where individuals of many diverse backgrounds feel comfortable.

1. Use our relationships in Multi cultural organizations to support these organizations and promote diversity.
2. Food and Beverage initiatives.
3. Celebration of holidays and special events.
4. Research of the trends and expectations in emerging multicultural markets.

DIVERSITY IN COMMUNITY GIVING

Greenwood Gaming and Entertainment is proud of its outstanding record in support to charitable organizations as well as effective outreach activities that create positive community impact.

1. Encourage strong and positive citizenship in the community.
2. Employees should be encouraged to participate in local community organizations.
3. Sponsor "How to apply for a job" workshops at local community colleges in the area.
4. Collaborate with community organizations to serve as mentors to any programs that support our diversity initiatives.
5. Provide scholarships for local students attending colleges and universities.
6. Outreach to community food banks with excess food from company inventory.
7. Target charitable payroll deductions to reflect our diverse employee population.

To bring financial support to worthwhile non-profit organizations in our community that are effective in the areas of healthcare, seniors and education. Over the last 4 years Greenwood Gaming and Entertainment has made significant philanthropic contributions totaling 7 million dollars. Some of the notable beneficiaries include:

- Living Beyond Breast Cancer
- Vita Education Services
- Community Options
- Network of Victim Assistance
- Contact of Greater Philadelphia
- Special Olympics
- Aid for Friends
- American Red Cross of Lower Bucks County
- NAACP of Bucks County

- Cystic Fibrosis
- YWCA of Lower Bucks County
- Bensalem EMS
- Minority Supplier Development Council
- Alex's Lemonade Stand
- Bensalem Parish's Education Fund
- Philadelphia Parish's Education Fund
- NAACP Bucks County Annual Dinner
- Bucks County Technical High School Scholarships
- Bensalem High School Scholarships
- Conwell-Egan Catholic High School
- Indian Republic Day
- VFW Andalusia War Memorial
- Philadelphia Firefighters Local 22
- St. Mary's Hospital
- Frankford Hospital
- African American Chamber of Commerce
- Hispanic Chamber of Commerce
- Asian American Chamber of Commerce
- Mid-Atlantic Horse Rescue
- Council on Compulsive Gambling
- Bensalem Fall Festival
- Bensalem Pride Day
- St. Patrick's Day Parade
- Citizens Crime Commission of the Delaware Valley
- Lower Bucks County Chamber of Commerce
- Greater Philadelphia Chamber of Commerce
- CADE – Helping Children Make Smart Decisions

DIVERSITY IN BUSINESS PARTNERSHIPS

It is our intention to create an environment where there is equality of opportunity in all of our business partnerships. We will work with a diverse group of contractors, suppliers and other vendors, certified minority owned, women owned, disabled and small business enterprises to provide our company with goods and services. A database will be developed to match historically under-represented suppliers to buying opportunities within our company.

We will encourage all of our partners to support diversity efforts through second tier supplier programs.

In turn the company will mentor disadvantaged businesses to help them develop.

Our executives are committed to attending trade shows and trade fairs as a way of meeting new potential partners and a web site will be created allowing for potential vendors to be included in the vendor database and receive information about procurement of goods and services.

Key diversity activities include:

- Review and improve our supplier diversity website for MBE, WBE and DBE online registration.
- Participate in construction meetings relating to the casino expansion at Philadelphia Park Casino to set the expectation for inclusion of minority and women owned businesses.
- Active participation in diversity focused trade shows, conferences and conventions such as the Minority Supplier Development Council, NAACP, Hispanic Chamber of Commerce, African American Chamber of Commerce, and Asian American Chamber of Commerce.

- Regular vendor meetings with our buyers to discuss enriching business partnerships through inclusion.
- Taking advantage of opportunities to mentor MBE, WBE businesses to include them in our supplier pipeline.
- Discussion of inclusion barriers to provide solutions

Our 2009 outreach results for MBE and WBE businesses areas are as follows:

- Vendors \$ 3,900,000
- Construction Contractors \$27,000,000

DIVERSITY AND INCLUSION COMMITTEE

To ensure that our goals are reached we will establish a Diversity and Inclusion Committee, which is chaired by a senior executive and includes representation from a broad spectrum of our organization. The Diversity Director is a key member of the committee.

The goal of the committee is to address three main diversity targets:

1. The Workplace – Recruitment, selection, training, pay, benefits upward, Mobility and work environment.
2. Guest Relations – Marketing, advertising and promotions.
3. Business Partnerships – Local community, minority, women, disabled and Veteran owned business.

The Diversity and Inclusion Committee will seek to create a positive atmosphere of awareness, fairness, inclusion and leverage.

DIVERSITY AND COMMUNITY DEVELOPMENT DIRECTOR

The Director of Diversity and Community Development reports to the Chief Operating Officer and is responsible for the implementation, monitoring and enforcement of the Diversity and Inclusion Plan. These responsibilities include without limitation, recruitment, equal opportunity awareness training, workforce statistical analysis, grievance counseling and fact finding, career advancement counseling, assessment and adaptation of all personnel and compensation policies and procedures for conformity with agreed policies approved by any federal or state equal employment and business opportunity laws, monitoring and coordinating contracting and purchasing and construction activities and developing and maintaining involvement of the company in the community in support of equal employment and business opportunity.

The Director of Diversity and Community Development will continually communicate with Human Resources, Purchasing and Facilities and Construction departments to ensure that the objectives of the policy are being met. These departments will be required to submit reports of contracts awarded and contractor advertising for all levels of the workforce to demonstrate efforts made to comply. In addition, the Diversity and Community Development Director works closely with the Vice President of Human Resources to review employment practices to determine that all policies and procedures apply equally to all employees and all policies comply with our diversity initiatives.

The Director of Diversity and Community Development works with local stakeholders to keep them informed as to the value of the company and its impact on the community. The Director also serves as a member of the Responsible Gaming Committee focusing on underage and problem gaming prevention.

The Director of Diversity and Community Development will work closely with the American Gaming Association task force. The AGA is committed to promoting diversity in the commercial casino industry and accomplishes this commitment through a number of initiatives that focus on hiring and procurement. The goal is to maximize participation on the human resource, purchasing and contracting subcommittees of AGA. The Director of Diversity and Community Development will coordinate Greenwood's participation in expos

And fairs designed to give small suppliers and vendors the chance to showcase their products directly with purchasing decision makers.

The Director of Diversity and Community Development will direct the company's philanthropic donations of a local, regional and national nature.

PLAN MEASUREMENT AND EVALUATION

Evaluation is continuous with quarterly reports to the Pennsylvania Gaming Control Board on the key areas of plan performance. Periodic site visits and audits from the Pennsylvania Gaming Control Board's Chief Diversity Officer are an important part of external evaluation.

Internally, the Diversity and Inclusion Committee will provide ongoing assistance with evaluation and measurement. Other activities of the committee include:

- Providing the CEO, COO and the senior executive committee with periodic audit reports of their findings, including identifying accomplishments as well as any areas for improvement.
- Providing the Gaming Board with a report of their diversity results during each license renewal period.
- Recommending diversity program and projects.
- Advising the company's management team with respect to the foregoing.
- Documenting the committee's activities and progress and updating the senior executives on that progress.