

HOLLYWOOD *Casino*[®]

YORK



DIVERSITY PLAN

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INTRODUCTION

Hollywood Casino York (“HCY”) is pleased to present this Diversity Plan for 2020 - 2021. As an entertainment destination for a diverse community, we are committed to fostering a workplace which champions diversity and inclusion.

Upon opening in 2021 HCY will feature:

- 80,000 SF facility
- 500 slot machines
- 24 Table Games
- Sports Book
- Race Book
- Live and electronic entertainment
- Lounge and Bar
- Casual Dining

From its inception, HCY will embrace the integral role of diversity. This Diversity Plan has been developed to outline the key aspects of our commitment to this important objective. The goals underlying this Diversity Plan are to ensure equal opportunity and to promote diversity in a manner reflective of the local community.

While the Plan refers frequently to “MBE” and “WBE” companies, the inclusive diversity philosophy of HCY 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 Diversity Plan refers to this broader concept of inclusion by the designation “other diverse groups”.

EXECUTIVE SUMMARY

PURPOSE

This Plan describes HCY's commitment to diversity relative to the construction and operation of the property. The Plan outlines specific procedures aimed at ensuring equal opportunity and diversity in employment, contracting, operations and community relations. 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.

REPORTING STRUCTURE

HCY established its Diversity Committee in April 2019 to oversee all diversity initiatives for the company. The Committee is responsible for advancing the diversity and inclusion strategy by setting strategic direction and managing all aspects of the strategy. The Vice President and General Manager chairs the Committee, which is comprised of members of senior management.

The Director of Compliance has been designated HCY's diversity officer.

STRATEGY FOR SUCCESS

HCY seeks to achieve its twin goals of ensuring equal opportunity and promoting diversity in a manner that reflects and includes the local community. The four focus areas of this Plan are:

- Construction
 - Build and enhance relationships within the community to raise awareness and identify qualified contractors and suppliers.
 - Include minority and women business enterprises, as well as other diverse groups in planned new construction and expansion projects.
- Procurement/Vendor Purchasing
 - Build and enhance relationships within the community to raise awareness and identify qualified vendors.
 - Ensure that all qualified vendors are given equal access to bid on our business.

- Employment
 - Build and enhance relationships within the community to raise awareness and identify potential candidates for employment.
 - Foster an inclusive work environment that results in both personal and business success.
- Community Involvement
 - Support our community and be a responsible corporate citizen.
 - Encourage participation in community initiatives across the entire organization.

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 HCY supports diversity as an inclusion concept, considerable attention is given to individuals and groups that historically have been adversely affected. For purposes of this 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.

MINORITY

For purposes of MBEs and WBEs, 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.

MINORITY BUSINESS ENTERPRISE (“MBE”) AND WOMAN BUSINESS ENTERPRISE (“WBE”)

Minority and female business enterprises that meet the guidelines set by the Pennsylvania Department of General Services Bureau of Diversity, Inclusion, and Small Business Opportunities or other similar organization.

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.

CONSTRUCTION

CONSTRUCTION MISSION

Inclusion of minority businesses and other diverse groups on major construction projects in central Pennsylvania is an important issue for the local minority community and for HCY. The proactive approach used to address minority participation during the initial casino build out resulted in both successful inclusion of minority businesses and the successful completion of the project. Future construction projects at HCY will utilize the same proactive approach.

GOOD FAITH PLAN FOR MINORITY CONSTRUCTION PARTICIPATION

Future construction projects will maximize the opportunity for minority participation by utilizing the successful techniques and practices employed during the initial casino build out including, but not limited to:

- Selection of third-party and in-house construction managers, through an interview process, who share HCY's commitment to minority participation.
- Utilization of diversity consultants with knowledge of the central Pennsylvania construction market.
- Close and continuous coordination with property-level and corporate purchasing departments as well as corporate Government Affairs department.
- Use of Commonwealth 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 upfront requirements on the part of construction managers to provide minority contractors and suppliers 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 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 HCY Diversity Committee, the PA Gaming Control Board, and other involved parties.

CONSTRUCTION GOAL

Over the next year HCY will focus on the initial build facility of the facility. Inclusion of minority contractors and suppliers in this construction project requires use of the specific steps outlined above, continuation of relationships developed throughout central Pennsylvania and constant cooperation with property and corporate purchasing departments to expand HCY's network of minority contractors and suppliers.

PROCUREMENT / VENDOR PURCHASING

PURCHASING MISSION

HCY considers quality, service, dependability and price as the main components of any vendor relationship. HCY pledges to partner, wherever possible, with minority and woman vendors, as well as other diverse groups, to create a mutually beneficial business climate. HCY's goal is to ensure that all qualified vendors are given equal opportunity to bid on products and services utilized at the HCY.

GOOD FAITH PLAN FOR MINORITY VENDOR PARTICIPATION

HCY diverse vendor purchasing initiatives include:

- Utilizing the Pennsylvania Department of General Services' Bureau of Diversity, Inclusion, and Small Business Opportunities business directory and database.
- Participating in Pennsylvania Department of General Services' Bureau of Diversity, Inclusion, and Small Business Opportunities and Women Business Opportunity development events.
- Attending and supporting Pennsylvania regional minority business fairs organized by the Minority Supplier Diversity Council of Pennsylvania, New Jersey and Delaware, the York County Economic Alliance, the South Central Workforce Investment Board, Crispus Attucks, and Penn State University York Campus.
- Periodically reviewing the Pennsylvania Department of General Services' Bureau of Diversity, Inclusion, and Small Business Opportunities list of approved vendors.
- Providing access to the applications and contact information of the Pennsylvania Department of General Services' Bureau of Diversity, Inclusion, and Small Business Opportunities.
- Creating a mentoring environment that helps new vendors understand the daily workings of the property's operations.
- Requesting user departments to review their annual budgets for purchasing opportunities, working with the minority database and reaching out to those minority suppliers provided by the purchasing staff.
- Establishing a reasonable payment plan, agreed upon by both the vendor and the Purchasing Department after review of the financial status of diverse vendors.
- Considering minority and women-owned business enterprises when reviewing Capital Expenditure projects.

- Direct diverse vendors to register online at www.pngamingvendors.com to become visible to both Penn National Gaming corporate procurement and other PNG properties.

VENDOR REQUIREMENTS

Vendors wishing to do business with HCY are required to complete a vendor registration packet before any contract or purchase orders are issued. No business is conducted or counted towards our purchasing procurement dollars unless the vendor packet is on file and complete. Vendors are licensed in accordance with the PA Gaming Control Board's regulations. HCY additionally reserves the right to complete a due diligence background check on any vendor.

PURCHASING OBJECTIVE

HCY's extensive efforts to identify, train and assist MBEs, WBEs, as well as other diverse groups of potential vendors results in a roster of vendors that maximizes diversity and is reasonably reflective of and inclusive of the local community.

MARKETING, PROMOTIONS, AND ENTERTAINMENT

HCY's Marketing Department endeavors to incorporate diversity in all aspects of its operations including working with minority vendors, supporting the property's community outreach efforts, and incorporating diversity in its communications materials and on-property entertainment. HCY's advertising messages, collateral, on-property signage, direct mail, web site, and featured video and live entertainment strive to project a message that all are welcome at HCY.

EMPLOYMENT / WORKFORCE DIVERSITY

EMPLOYMENT MISSION

HCY is committed to recruiting, developing and retaining the best employees regardless of race, color, religious creed, ancestry, age, sex (including pregnancy, childbirth and related medical conditions), national origin, disability (includes physical or mental impairment and use of a service animal), status as GED holder (vs. high school diploma holder), HIV/AIDS status or military status. HCY strives to create a diverse work environment that fully capitalizes on the abilities, skills, and potential of our employees. This diversity provides a deep understanding of our guests' needs and supports creative and innovative process development.

HCY's recruiting efforts include, but are not limited to:

- On-site job fairs spotlighting different departments;
- Attendance at community job fairs sponsored by local institutions of higher education, trade schools, media, and diversity groups;
- Membership in area chambers of commerce;
- Executive leadership speaking at local institutions of higher education and trade schools;
- Property tours for students of local institutions of higher education and trade schools;
- Posting jobs in newsprint, radio, tv/media, and internet

EMPLOYMENT GOALS

HCY continues to strive to maintain a workforce that reasonably reflects the diversity of its community and surrounding areas.

TRAINING, DEVELOPMENT & RETENTION EFFORTS

HCY's education and training efforts focus on developing a high-functioning, service-oriented diverse workforce. HCY provides hiring best practice training to ensure consistency with its EEO recruiting and hiring practices. HCY conducts diversity training designed to foster a welcoming environment for all and reinforce respect in the workplace. HCY also provides development to its management team with an emphasis on managing a diverse workforce by reinforcing consistency and fairness in the workplace, generational diversity, cultural diversity, and how to manage effective

teams in a service environment. HCY provides team members with departmental training that allows them to successfully integrate into their new departments.

WORKPLACE INCLUSION

HCY's management team is responsible for fostering an inclusive environment where all team members feel valued and respected. Leadership is expected to consider diverse perspectives in decisions affecting team members. Leadership is expected to foster an environment that inspires and engages team members to reach their full career potential. Leadership is expected to truly get to know and learn about their team members and maintain a two-way dialogue. At least annually, team members complete engagement surveys to provide their feedback, anonymously, as to leadership's performance. Each department is required to engage its team members to create action plans for improvement.

COMMUNITY AFFAIRS / CHARITABLE CONTRIBUTIONS

COMMUNITY INVOLVEMENT AND BUILDING TRUST

HCY will find opportunities to be community-minded civic leader in the greater York County area. HCY's affiliate company, Hollywood Casino at Penn National Race Course, already supports dozens of charitable organizations in the greater York County area. HCY will impact key community service and minority support organizations, not only with financial support but also through the donation of time and hands-on efforts of our team members.

CONCLUSION

HCY works as a team to develop high-performing, inclusive work environment reflective of its diverse community. HCY strives to create a company culture where all ideas and all contributions are valued no matter how or from whom they may originate. HCY's commitment to making inclusiveness the foundation of its culture is driven not only from its desire to enhance the community, but also from its importance to maintaining a sound business strategy.

APPENDIX A—EQUAL EMPLOYMENT OPPORTUNITY

EQUAL EMPLOYMENT OPPORTUNITY

Hollywood Casino affirms its commitment and pledges its full support of equal employment opportunity for all persons, regardless of race, color, religious creed, ancestry, age, sex (including pregnancy, childbirth and related medical conditions), national origin, disability (includes physical or mental impairment and use of a service animal), status as GED holder (vs. high school diploma holder), HIV/AIDS status or military status.