Mount Airy
Casino ♦ Resort

Updated as of
January 2018

MOUNT AIRY DIVERSITY PLAN

I. Diversity Policy Mission Statement

It is the policy of Mount Airy #1, L.L.C. d/b/a Mount Airy Casino Resort ("Mount Airy") to foster and promote an appreciation for the unique values of different individuals and to allow employees to realize, grow and develop their potential to reach their personal goals, while recognizing the goals of Mount Airy. Our goal is to apply these same ideals in our interactions with customers, guests, vendors, consultants and the communities in which we work and live. In order to apply these ideals to others:

- Each employee shall treat others with respect and dignity.
- All Mount Airy policies and procedures shall support and encourage diversity goals; and
- Mount Airy shall create and support an environment in which each employee shall have the opportunity to maximizing their abilities and level of expertise.

Mount Airy is committed to a policy of operating its Casino Resort entertainment complex that achieves the following goals:

- A talented staff of employees that represents the diverse groups of the Commonwealth of Pennsylvania, particularly those within the Greater Northeastern Pennsylvania market;
- A group of contractors, subcontractors, vendors and suppliers that continues to achieve representation from the Commonwealth of Pennsylvania, particularly the Greater Northeastern Pennsylvania metropolitan market, so that we ensure a balanced representation of minority and women owned businesses;
- A marketing effort that targets prospective customers from all ethnicities in the Greater Northeastern Pennsylvania market.

Mount Airy promotes diversity and assures that all persons receive an equal opportunity in employment. The promotion of diversity extends to contractors, subcontractors, assignees, lessees, agents, vendors and suppliers. Mount Airy assures equal employment opportunity for all persons, regardless of race, color, religion, gender, sexual orientation, age, national origin, citizenship status, or disability and is committed to:

- Taking proactive steps in addressing the issue of diversity communicating with employees, patrons, and the community regarding diversity;
- Actively soliciting a diverse group of employees, contractors, subcontractors, assignees, lessees, agents, vendors, and suppliers;

- Developing and instituting practical strategies to ensure the implementation of the diversity Mission Statement.

Mount Airy is dedicated to operating an organization that reflects a fundamental respect for different ways of working and living. We intend to assure every individual the opportunity to reach his or her potential. Mount Airy is committed to being proactive in promoting diversity throughout all aspects of its operations. We believe that all employees are responsible for contributing to a work environment free from discrimination and prejudice, regardless of position or title. We promote this belief by:

- Posting the Mission Statement on Mount Airy's on-site employee communication boards;

- Inclusion of diversity materials in Mount Airy's Employee Handbook.

II. Diversity Plan Overview

A. Scope

Mount Airy is committed to a policy of operating its Casino Resort entertainment complex in a manner that achieves the following goals:

- A capable staff of employees that represents the diverse groups of the Commonwealth of Pennsylvania, particularly those within the Greater Northeastern Pennsylvania market;

- A group of contractors, subcontractors, vendors and suppliers that continues to achieve representation from the Commonwealth of Pennsylvania, particularly the Greater Northeastern Pennsylvania metropolitan market, so that we ensure a balanced representation of minority and women owned businesses;

- A marketing effort that targets prospective customers from all ethnicities in the Greater Northeastern Pennsylvania market.

Mount Airy promotes diversity and assures that all persons receive an equal opportunity in employment. The promotion of diversity extends to contractors, subcontractors, assignees, lessees, agents, vendors and suppliers. Mount Airy assures equal employment opportunity for all persons, regardless of race, color, religion, gender, age, national origin, sexual orientation, citizenship status, or disability and is committed to:

- Taking proactive steps in addressing the issue of diversity communicating with employees, patrons, and the community regarding diversity;

- Actively soliciting a diverse group of employees, contractors, subcontractors, assignees, lessees, agents, vendors, and suppliers;
- Developing and instituting practical strategies to ensure the diversity Mission Statement.

Mount Airy is dedicated to maintaining an organization that reflects a fundamental respect for different ways of working and living. We allow every individual the opportunity to reach his or her potential. Mount Airy is committed to being proactive in promoting diversity throughout all aspects of its operations. We believe that all employees are responsible for contributing to a work environment free from discrimination and prejudice, regardless of position or title. Mount Airy disseminates its Mission Statement externally by:

- Annual distribution of the Mission Statement to all employees of Mount Airy;
- Making new employees aware of the existence of the Mission Statement through new hire orientation;
- Inclusion of diversity materials in Mount Airy's Employee Handbook.
- Through the inclusion of provisions prohibiting discriminatory practices in all purchase agreements, leases and contracts;
- Through the posting of the Mission Statement on Mount Airy's website.

B. Components of Mount Airy's Plan

Mount Airy's Diversity Plan is comprised of the following components:

- Establishment of a Diversity Committee
- Building Community Involvement
- Recruitment and Employment
- Vendors and Suppliers
- Marketing and Entertainment
- Diversity Awareness Training Programs
- Procurement and Construction
- Periodic Performance and program Review
- Continuous Improvement and Industry Best Practice

1. Diversity Committee

The Chief Operating Officer has established a Diversity Committee under the direction of the Executive Director of Human Resources (Diversity Officer). The Diversity Committee

is comprised of Mount Airy's Executive Vice President and General Manager, Executive Director of Human Resources, Director of Purchasing, Manager of Human Resources and Director of Surveillance. The committee monitors and reviews the progress and results of Mount Airy's diversity program. All segments of the program, including recruiting and training of employees are reviewed, along with the evaluation of the contractor, supplier and vendor initiatives. The committee meets on a regular basis, and makes recommendations to upper level management.

Mount Airy's Diversity Officer provides counseling to employees regarding appeal rights and options, problems, complaints, and discrimination issues. Mount Airy's Diversity Officer investigates complaints that involve allegations of discrimination based on race, color, religious creed, age, sex, ancestry, union membership, sexual orientation, national origin, AIDS or HIV status, general identity or expression, or non job-related disability.

The Diversity Committee conducts quarterly reviews to ensure compliance with all aspects of Mount Airy's diversity program. The review will assess the overall effectiveness of the program, centered on the diversity of employees, contractors, vendors and suppliers.

A. Community Involvement

Mount Airy ensures that diversity is respected, encouraged, and embraced throughout its organization, and strives to promote the same throughout its community. Mount Airy has developed relationships with local community organizations such as the United Way, various chambers of commerce, and other organizations representing minority constituents, and uses the internet and advertising opportunities to promote diversity efforts.

B. Recruitment & Employment

As it has proven in its hiring practices, Mount Airy is committed to recruiting, retaining and developing the best employees regardless of race, color, religion, sex, age, disability or national origin. Mount Airy complies with the Equal Employment Opportunity Act and will adopt policies consistent with the Act that apply to all employment practices including recruitment, hiring, evaluation, promotion, transfer, discipline and termination, as well as forms of employee compensation.

Recruiting tools that are utilized to help ensure a diverse workforce include classified advertising in targeted newspapers, job fairs, posting job listings on the internet, working with local organizations and chambers of commerce, and listing job openings with local and state agencies. Mount Airy also utilizes niche publications that reach out to a broad spectrum of cultures to advertise our job opportunities. Mount Airy has identified civic groups and community organizations that represent diverse constituencies to help promote the message of our employment opportunities. In order to maximize diverse recruitment, Mount Airy also does the following;

Recruit in different languages so that we do a responsible job of promoting our employment opportunities to those persons who speak English as a second language;

- We will identify those local organizations that train and help secure employment for persons with disabilities;
- Job descriptions are carefully written to not include restrictive and unnecessary minimum requirements that might restrict our ability to employ ethnic minorities and the disabled;
- Provide training and development to our premiere performers so that excellent employees who are either women or ethnic minorities can be qualified to assume positions of management responsibility.

C. Vendors and Suppliers

The director of purchasing, in conjunction with the diversity officer, make every effort to reach out to qualified minority and women owned vendors who are able to provide the products and services necessary to meet the operational needs of Mount Airy.

Despite limited availability of qualified minority owned vendors in the Greater Northeastern Pennsylvania area, Mount Airy, whenever possible attempts to reach out to such M/WBE vendors and community organizations that support such vendors such as the Monroe County Chambers of Commerce as well as various community organizations.

Mount Airy also uses the Commonwealth's list of certified minority and women owned vendors as a resource to finding and contracting with such vendors. Further, Mount Airy endeavors to hire vendors and suppliers, etc. that maintain a diverse workforce and implement a diversity plan. Additionally, its efforts include:

- Active measures on the part of Mount Airy's Director of Purchasing to solicit and secure services with qualified minority and woman owned vendors;
- Networking with ethnic chambers of commerce and civic organizations to help recruit qualified vendors;
- Utilizing niche media to help attract qualified vendors;
- Utilizing public information that lists businesses owned by women and ethnic minorities.

D. Marketing and Entertainment

- Mount Airy aggressively markets to attract ethnic minorities and niche groups. Such efforts will include:
- Advertising in targeted ethnic publications;
- Motor coach bookings of ethnic and religious organizations;
- A diverse program of onsite performers that will allow us to offer something that is appealing to a variety of groups.

E. Diversity Awareness Training Program

The objective of Mount Airy's diversity awareness training program is to employ a staff that is cognizant of the needs of its fellow employees and also the diverse customer base that patronizes Mount Airy; Mount Airy's training efforts are designed to ensure that all employees are aware of diversity issues and have an understanding of ethnic changes in the workplace. In order to provide the very best customer service, it is necessary for Mount Airy's employees to understand the importance and appreciation of individual differences, so that stereotypes and prejudices may be overcome. Mount Airy has a zero tolerance policy towards discrimination of women, ethnic minorities and persons with disabilities. All Mount Airy employees required to complete the diversity awareness training program during employee orientation.

F. Procurement and Construction

Mount Airy requests proposals in order to receive and select from a wide range of bidders for each of its major contracts, Mount Airy seeks to identify a diverse group of potential vendors and suppliers. Certified minority-owned, women-owned, disabled and small business enterprises will be encouraged to support diversity efforts through both first and second-tier supplier programs.

G. Continuous Improvement & Industry Best Practices

Mount Airy intends to continually look for ways to improve existing operations and to ensure that industry best practices are employed whenever possible.

II. Implementation of Diversity Plan

A. Corporate Level Responsibility

The Pennsylvania Gaming Act requires that a corporate manager be appointed for diversity activities. Mount Airy Casino Resort's corporate manager for

diversity activities will be Mount Airy's Executive Director of Human Resources. In this capacity, the Executive Director of Human Resources is responsible for supervising the staff within the Human Resources Department and the staff who work with departmental management to coordinate diversity activities.

The appointed corporate manager for diversity activities responsibilities include but are not limited to:

- Coordination of the Diversity Plan and creation of standard goals and criteria to meet the requirements of the Pennsylvania Gaming Act and its regulations;
- Advising and directing management employees on all requirements of the Diversity Plan;
- Serving as the primary contact with the Pennsylvania Gaming Control Board and any other governmental officers, as well as other organizations which benefit minorities;
- Reviewing the various diversity activities and functions to assure conformity with corporate policy as to diversity;
- Review and recommend improved practices which advance the objectives of the Diversity Plan on an as-needed basis.

B. Management Level Responsibility

The Chief Operating Officer of Mount Airy has the ultimate responsibility for compliance with the Gaming Act and Gaming Control Board regulations. However, to fully realize diversity, management employees must also implement equal employment and diversity policies at the departmental levels and their duties include the following:

- Compliance with both the letter and the spirit of the diversity policy;
- Educating all management employees of the diversity policy and how to implement the policy in employee relations;
- Ensuring that all employees comply with the diversity policy;
- Promptly and effectively addressing any efforts to avoid or impede compliance with the diversity policy;

- Maintaining any necessary documents, data and/or information related to implementation, compliance and enforcement of the diversity policy;

- Establishing, maintaining and auditing systems that will measure effectiveness, achieving objectives and compliance with state and federal requirements;

- Keeping abreast of all federal, state and local laws and regulations affecting the diversity policy;

- Keeping Mount Airy management informed of any issues and/or problems related to the implementation and execution of the diversity policy;

- Developing and implementing training programs on an as-needed basis.

C. Employee Level Responsibility

Recognizing that achievement of diversity involves every level of employment; all employees' duties include the following:

- Compliance with both the letter and the spirit of Mount Airy's diversity policy;

- Keeping the corporate manager informed of any issues and/or problems related to the implementation and execution of the diversity policy, and

- Participating in training programs.

D. Conclusion

Mount Airy takes the issue of diversity in its workforce, hiring and business practices very seriously and works every day to run the type of facility which embraces the principles and practices set forth in this plan. To do so is integral to a successful operation. The foregoing plan serves as our template to meet our diversity goal. We are dedicated to continued success in this regard.