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DIVERSITY PLAN

March 21, 2012

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DIVERSITY PLAN POLICY STATEMENT

It is the policy of Presque Isle Downs to take aggressive, lawful action to enhance the diversity of our workforce. The policy supports the company's strategic plan to achieve excellence in providing quality products and services to our guests.

Presque Isle Downs is committed to promoting diversity initiatives that attract qualified candidates who are minority, female or disabled. Furthermore, the company is committed to:

- Using job-related requirements to evaluate staff for promotion and applicants for employment;
- Prohibiting discrimination on the basis of race, color, religion, gender, sexual orientation, age, national origin, ancestry, veteran status, non-job related disability; or other basis prohibited by applicable law; and
- Complying with applicable federal, state and local laws.

The company is committed to basing its employment decisions on the principles of equal employment opportunity and to ensuring that all personnel actions, including but not limited to, recruitment, hiring, training, promotion, compensation, benefits, transfer, layoff and social and recreational programs are administered in accordance with the company's commitments to non-discrimination and equal employment.

The management of Presque Isle Downs believes equal employment and diversity policies are a shared responsibility. The Director of Human Resources oversees Presque Isle Downs' diversity program. The Board of Directors, corporate executive management, department directors, department heads and hiring supervisors support the Director of Human Resources in maintaining the importance of diversity as a critical component of operations. The Director of Human Resources coordinates and implements policies and programs, monitors the company's efforts in these areas and analyzes results, and handles or refers complaints to appropriate company contact points. The broad-based, decentralized efforts of the community are key to meeting the company's equal employment opportunity commitment.

Through administration of these equal employment opportunity and diversity policies, the company intends to pursue inclusion of all people in the diversity that strengthens Presque Isle Downs in its pursuit of excellence.

Any applicant or employee of Presque Isle Downs who believes that a violation of Presque Isle Downs' stated policy of equal opportunity in employment has taken place or that he or she has received inequitable treatment because of discrimination should communicate their complaint, either in writing or in person, with the Human Resources Department, P.O. Box 10728, Erie, PA 16514 or by contacting the Human Resources office at (814) 866-8334.

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DEVELOPMENT AND EXECUTION OF ACTION-ORIENTED PROGRAMS

The company applies the following guidelines in developing and executing action-oriented diversity programs:

1. Job Descriptions

- a. Conduct detailed analysis of job descriptions to ensure that they accurately reflect the essential functions of the job. The analyses are updated as the duties of a position change and are distributed to all appropriate individuals.
- b. Develop worker specifications using essential function criteria. Job requirements include education, experience, and skill requirements necessary to qualify for the job opening. Worker specifications are distributed to referral sources when job opportunities arise.

2. Hiring-Selection

- a. Evaluate selection process periodically to ensure freedom from bias. Select and train personnel involved with recruiting, screening, selection, promotion, discipline, and related processes. The recruiting, screening, referral, and selection process must demonstrate a good-faith effort to remove identified barriers, expand employment opportunities, and produce measurable results.
- b. Observe the requirements of the "EEO UNIFORM GUIDELINES" on Employee Selection Procedures by performing periodic audits of personnel activities and retaining records if material adverse impact on minorities or women seems likely.
- c. Monitor the manner applicants are referred to managers for hiring consideration to ensure the process is nondiscriminatory.

3. Compensation System(s)

- a. Review compensation system(s) periodically to determine if there may be race, color, religion, gender, sexual orientation, age, national origin, ancestry, veteran status, non-job-related disability disparities. Where disparities cannot be explained in terms of performance, length of service, or other lawful factors, corrective action will be taken.

4. Recruitment Efforts

Establish recruitment efforts to maintain a flow of qualified minority and female applicants:

- a. Solicit minority, women's and veteran's organizations and organizations concerned with persons with disabilities for referral of applicants.
- b. Offer briefings both on and off premises with representatives from recruitment sources concerning current and future job openings.

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- c. Encourage minority, female, veteran, and employees with a disability to refer applicants for employment.
 - d. Participate in career day programs, using minority and female employees whenever possible.
 - e. Establish recruitment efforts at schools with special programs that reach minorities, women, and persons with a disability.
 - f. As opportunities arise, encourage community child care, housing, and transportation programs designed to improve the employment opportunities for minorities, women, and persons with a disability.
 - g. Ensure that job openings have been sent to community partners.
5. Promotions
- Ensure that all employees are given equal opportunity for promotion:
- a. Communicate promotional opportunities.
 - b. Initiate job training programs.
 - c. Conduct employee performance evaluation programs.
 - d. Provide clearly defined job descriptions.
6. Career Counseling
- Monitor career counseling to ensure that all employees are given equal opportunity for career counseling:
- a. Upon request, counsel employees relative to advancement opportunities open to them and the training programs available to assist them in their career development.
 - b. Instruct managers and supervisors to refer any employee seeking Career Counseling to Director of Human Resources or Recruiting & Benefits Specialist.
7. Training, Promotion and Retention
- Give all employees equal opportunity to obtain training:
- a. Announce training opportunities.
 - b. Develop training programs that enhance advancement potential.
 - c. Coordinate training programs for workforce development
 - d. Promotional opportunities will be posted internally in two locations for five days per the company's job posting policy.
 - e. Monitor retention rates on a quarterly basis by comparing the previous quarter's Diversity Report that is provided to the PGCB. If areas of concern are identified, conduct exit interviews with individuals who left during that quarter to determine if there are problem areas. Develop action plans accordingly.

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DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION OF DIVERSITY PLAN

The Director of Human Resources has been designated as the Equal Employment Opportunity Coordinator for the company and has the full support of the Vice President & General Manager and other top management in carrying out these duties.

The company's philosophy and policy on equal employment opportunity and diversity is set out in its corporate employment policy and in its company handbooks.

The Director of Human Resources, as Equal Employment Coordinator, has oversight of the following responsibilities:

- Develop policy statements and internal and external communication of those policies.
- Develop lawful action-oriented programs that seek to remove identified barriers to minority and female employment and expand employment opportunities for those groups.
- Measure the effectiveness of diversity programs.
- Design and implement audit systems.
- Serve as liaison with enforcement agencies.
- Serve as liaison with minority, women's, disabled and veteran's groups.
- Keep management informed of the latest developments in the entire equal opportunity area.
- Provide career counseling for employees.
- Make sure that posters are properly displayed.
- Make sure that all facilities are available on a non-discriminatory basis.
- Maintain the prior years' diversity plan and all related documents.
- Maintain all required records.

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RECRUITING PROCEDURES

After the Recruiter receives an approved Request for Hire (must be signed by the Department Head and Human Resources), the following steps will be taken:

1. Recruiter posts the open position at designated employee locations on the property:
 - a. Recruiter will review all qualified applicants, both internal and external, and will forward any favorable applicants to the manager of the department with the open position.
 - b. If sufficient qualified applicants are not found, Recruiter will proceed to the next step.
2. Recruiter will post the position on the company's website and will contact the local community partners listed here:

Allegheny College

Primary Contact: Kay Nageotte, Career Developer
knageott@allegheny.edu
(814) 332-2381

Barber National Institute

Primary Contact: Cassandra Pilarski, Transitional Employment Spec
www.BarberInstitute.org
(814) 874-5509

Booker T. Washington Center

Primary Contact: William Jeffress, Executive Director
wjeffress@btwcenter.com
(814) 453-5744

Careerlink/GECAC

Primary Contact: Dale Meyer
dmeyerr@eriecareerlink.org

Cascade Rehab/Disability

Primary Contact: Roy Patton
roy.patton@cascaledgedisability.com
(412) 920-6165

Clark Resources

Primary Contact: Fred Clark, President
fredclark@clarkresources.com
(717) 230-8861

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Erie Institute of Technology

Primary Contact: Bill Burchfield
billb@erieit.edu

Erie Business Center

Primary Contact: Michelle Coon, Student Services Administrator
michelle.coon@ErieBC.edu
(814) 456-7504, ext. 117

Erie County Career Link

Primary Contact: Steve Curcio
stcurcio@state.pa.us

Gannon University

Primary Contact: Janet Armbruster, Employment Coordinator
ARMBRUST003@gannon.edu
(814) 871-5603

GECAC (Greater Erie Community Action Committee)

Primary Contact: Jean Burrell, Division Mgr/Workforce Development
jburrell@eriecareerlink.org
(814) 455-9966, ext. 600

GECAC (Housing Authority of the City Of Erie)

Primary Contact: Ninoska Navarro
navarron@hace.org
(814) 456-2028, ext. 2262

Helping You, Helping Me

Primary Contact: Johnny Johnson
Blesses112@hotmail.com

Home By 3

Primary Contact: Kevin Caine
Kevin.caine@HomeBy3.com

International Institute of Erie

Primary Contact: Meliha Huseinagic, Supervisor, Employment Services
mhuseinagic@interinsterie.org
(814) 452-3935

John F. Kennedy Center

Primary Contact: Karen Grettler, Planner
kgrettler@thejfkcenter.org
(814) 898-1816

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John Horan Garden Apartments

Primary Contact: Don Knappenberger, Job Developer
Don_knappenberger@iu5.org

Multicultural Community Resource Center

Primary Contact: Paul Jericho
PJericho@multiculturalcrc.org

Mercyhurst College

Primary Contact: David DeSante, Coordinator, Coop Edu
d-desante@mercyhurst.edu

NAACP Erie

Primary Contact: Dorothy Smith-Frazier, President
Dsmith-frazier@phcse.org
(814) 899-8787

National Organization for Women

Primary Contact: Susan Woodland, President
nwpanow@surferie.net
(814) 734-1018

Non-Profit Partnership

Primary Contact: Edison Nicholson
Enicholson_!!!@hotmail.com

Northwest Regional Technology Institute

Primary Contact: Barbara Tyler, Placement Coordinator
btyler@nwrti.com
(814) 455-4446

Silvana Rabat, Internship Coordinator
srabat@nwtri.com
(814) 455-4446

Office of Vocational Rehabilitation

Primary Contact: Thomas Wellington
thwellington@pa.gov
(814) 871-4551

PA Careerlink

Primary Contact: Luis Sepulveda, Careerlink Specialist
lsepulveda@state.pa.us
(814) 455-9966, ext. 511

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PA Culinary Institute

Primary Contact: Emmy Griffith, Employer Services Coordinator
egriffith@paculinary.com
(412) 325-3147

Penn State Erie, The Behrend College

Primary Contact: Carol Capan, Employer Relations Coordinator
Cjc2@psu.edu
(814) 898-6164

Pittsburgh Technical Institute

Primary Contact: Lindsay Hornburg
Hornburg.lindsay@pti.edu

RBWCCS

Primary Contact: Mark Atkinson, HR Director
matkinson@rbwileyccs.org
(814) 461-9600, ext. 210

Regional Career Technical Center (ECTS)

Primary Contact: Pat Kalinowski
pkalinowski@ects.org
(814) 864-0641

St. Benedict's Education Center

Primary Contact: Russell Connor, Job Developer
Art Kujawinski, Job Developer
Judi Jaworski, Job Developer
Deborah McQuaid, Job Developer
Ssbec2002@yahoo.com
(814) 452-4072

Stairways Behavioral Health

Primary Contact: Jeanne Daugherty, Manager of Supported Employment
jdaugherty@stairwaysBH.org
(814) 464-8083

Tri State Business Institute

Primary Contact: Destiny Carter, Community Employment Specialist
DCarter@tsbi.edu
(814) 838-7673

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Urban Erie Community Development Corporation

Primary Contact: Glenn Duck, Jr., Job Developer
gduck@uecdc.org
(814) 899-3904, ext. 24

Urban League of Greater Pittsburgh

Primary Contact: A. Odell Richardson, Director, Employment
orichardson@ulpgh.org
(412) 227-4164

US Army Reserves

Primary Contact: Robert Luppe, Program Support Manager
rluppe@comcast.net
(814) 849-6085

Vietnam Veterans of America

Primary Contact: Kenneth Kensill
vietken@adelphia.net
(814) 899-2858

Western PA Career Transition Services

Primary Contact: Richard Heckert, Job Developer
Heckert.richard@jobcorps.org
(412) 441-8700, ext. 4412

WIA Program (Workforce Investment Act)

Primary Contact: John Buettner
jbuettner@eriecareerlink.org
(814) 455-9966, ext. 432

3. Recruiter will contact the local newspapers to post the open positions:
 - a. Contact Marketing

Local Newspaper: Erie Times News

Recruiter will interview all qualified applicants, both internal and external, and will forward any favorable applicants to the manager of the department with the open position.

If sufficient qualified applicants are not found, the Recruiter will proceed to the next step.

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4. Recruiter will post open position on selected on-line recruiting websites:

- a. www.monster.com - Sang Lee: 703-269-0141
- b. www.employmentguide.com - Terry Nickle: 412-257-2979 x223,
terry.nickell@employmentguide.com
- c. www.ihirehospitality.com - 877-798-4854
- d. www.careerbuilder.com - Tim Hennessey: 773-527-5614,
tim.hennessey@careerbuilder.com
- e. www.casinocareers.com - 609-813-2333

Recruiter will review applications of all qualified applicants, both internal and external, and will forward any favorable applicants to the manager of the department with the open position.

If sufficient qualified applicants are not found, the Recruiter will proceed to the next step.

5. Recruiter will notify Human Resources and the Department Head that there are insufficient current qualified local applicants for the position. Necessary steps will be taken to fill the position.

NOTE: STEPS MAY OFTEN BE RUN SIMULTANEOUSLY DEPENDING ON THE NATURE OF THE SITUATION.

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RECRUITING PROCEDURES CHECKLIST

HR Recruiter: _____

Department: _____ Position: _____

1. Date Recruiter posted the open position internally: _____
2. Local employment service agencies, local colleges and technical schools, community agency-based employment programs and the date notified of open position:
 - a. _____
 - b. _____
 - c. _____
 - d. _____
 - e. _____
 - f. _____
3. Local newspaper contacted, include contact date and date published:
 - a. _____
 - b. _____
4. High volume city contacted, include contact date and date published:
 - a. _____
 - b. _____
5. On-line recruiting website contacted and date position posted:
 - a. _____
 - b. _____
6. Date Recruiter contacted the Director of Human Resources and Department Head that there are no current local applicants qualified for the positions:
 - a. _____
 - b. _____

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DISSEMINATION OF DIVERSITY POLICY

Dissemination of Policy

Presque Isle Downs has established various channels of communication to ensure that employees and the community are aware of the company's positive posture toward Equal Employment Opportunity (EEO) and Diversity.

Internal Dissemination

The Diversity Plan is stated as part of Presque Isle Downs' employee relations policy and is covered in our Employee Policies & Procedures.

Formal presentations are made to management, supervisors, and employees from time to time concerning affirmative action. The Diversity Plan is reviewed each year by the HR Director and updated accordingly. If hiring takes place, regular updates are given to local and corporate management on progress in addressing underutilized areas. In those units where employees are represented by a collective bargaining agent, the unions are formally made aware of this policy.

In management and supervisory training, the entire concept of diversity is covered.

When we hire, new employees are formally made aware of our policy on diversity and anti-harassment, sex discrimination guidelines, and the Equal Pay Act. This policy is posted on a number of bulletin boards at this location.

Key local management and support personnel undergo EEO and diversity training from time to time. Supervisors and managers participate in the review of underutilized categories.

When we feature employees in our employee publications, minorities, women and individuals with disabilities are included.

Our local diversity program is monitored on a quarterly basis by legal counsel.

As part of our policy of good communication, this facility has notified appropriate recruiting sources and the headquarters offices of the unions with whom we deal on the company's policy concerning EEO and diversity. When hiring occurs, we request referral of qualified women, minorities and individuals with disabilities for all positions.

Our customers, contractors, and various community groups have been notified of our policies. The company communicates its commitment to EEO by recruitment advertising through regular media and through minority and women's publications.

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Minority and non-minority men and women are pictured in product and consumer advertising and in our annual report.

Written notification of EEO policy, as well as requests for certification regarding compliance with EEO laws, is sent to suppliers and subcontractors. We require that EEO clauses be incorporated as part of all purchase orders and contracts.

All "Help Wanted" advertisements carry the notice "Equal Opportunity Employer", and this designation is included in recruiting brochures and literature.



VENDOR DIVERSITY PLAN POLICY STATEMENT

It is the policy of Presque Isle Downs to assist in providing economic opportunities for disadvantaged and emerging small businesses and make reasonable good faith efforts to achieve these goals.

Presque Isle Downs is committed to promoting diversity initiatives that attract qualified contractors, subcontractors, assignees, lessees, agents, suppliers, and vendors who are minority, female or disabled. To the extent lawful and feasible, the company is committed to expansion of opportunities for:

- Contracting or transacting directly with minority, women's, or disabled person's business enterprises.
- Contracting with a non-minority business enterprise under terms and conditions that establish a participation plan.

The Management of Presque Isle Downs believes vendor diversity is a shared responsibility. The Purchasing Manager oversees Presque Isle Downs' Vendor Diversity Program. The Vice President & General Manager, department directors, department heads and contracting supervisors support the Purchasing Manager in maintaining the importance of vendor diversity as a critical component of resort operations. The Purchasing Manager implements policies and programs, monitors the company's efforts in these areas, reports results, and handles or refers complaints to appropriate company contact points.

Through administration, monitoring, and communication of this policy, the company will attempt to ensure that all people are included in the diversity that strengthens Presque Isle Downs in its pursuit of excellence and enhancing the representation of diverse groups in the operation.

Any contractor, subcontractor, assignee, lessee, agent, vendor, or supplier of Presque Isle Downs who requires additional information regarding this policy should communicate, either in writing or in person, with the Purchasing Manager, P. O. Box 10728, Erie, PA, 16514 or by contacting the Purchasing Department at (814) 866-8337.

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DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION OF VENDOR DIVERSITY PLAN

The Purchasing Manager has been designated as the Vendor Diversity Coordinator of the company and has the full support of the General Manager and other top management in carrying out these duties.

The Purchasing Manager, as Vendor Diversity Coordinator, has the following responsibilities:

- Develop policy statements and internal and external communication of those policies.
- Develop lawful action-oriented programs that attempt to remove identified barriers to disadvantaged, female, and minority contractors, suppliers, and vendors.
- Expand opportunities for those groups.
- Educate management staff on the requirements of the program.
- Design appropriate procedures that enable effective monitoring of the program.
- Measure the effectiveness of the programs.
- Design and implement audit systems.
- Prepare analysis of diversity program implementation on a quarterly basis and communicate the results to management. Forward quarterly results to Director of Human Resources for inclusion in Presque Isle Downs' quarterly Diversity Report to PGCB.
- Serve as liaison with regulatory agencies.
- Serve as liaison with minority, women's, disabled, and veteran's groups.
- Keep management informed of the latest developments.
- Maintain the prior years' diversity plan and related documents.
- Maintain all required records for a minimum of five years.