



RIVERS
CASINO
PHILADELPHIA

Rivers Casino Philadelphia
Diversity Plan

WINNING THROUGH DIVERSITY

Sugarhouse HSP Gaming, LP

Diversity Plan

Sugarhouse HSP Gaming, LP (d/b/a “Rivers Casino Philadelphia”) is committed to the principle of winning through diversity and inclusion at all levels – ownership, management, building construction, and casino operations.

Rivers Casino Philadelphia recognizes that attracting a diverse pool of talented people and retaining them in positions at all levels of the company is essential to our success. In addition, Rivers Casino Philadelphia believes that it must be able to contract for goods and services with diverse vendors and suppliers in order to be successful. Each component of this diversity plan (the “Diversity Plan” or “Plan”) is designed to enable Rivers Casino Philadelphia to reach its goal of reaching the top of the gaming industry.

DIVERSITY AND INCLUSION MISSION STATEMENT

The following mission statement summarizes Rivers Casino Philadelphia’s commitment to diversity. It will be posted in prominent places throughout the facility. It communicates the foundation of our diversity and inclusion mission to Team Members, business partners and our community:

Rivers Casino Philadelphia is devoted to building and nurturing a diverse and inclusive environment, and is committed to equal opportunity employment and participation by all team members in all employment classifications throughout the organization. This commitment to equal opportunities and diversity also applies to our vendors, suppliers and independent contractors.

- *We are committed to recruiting, employing, training and advancing talented people of any race, ethnicity, national origin, sex, sexual orientation, gender identity and expression, marital status, family status, age, religion, military and veteran status, citizenship or ability.*
- *We actively search for a diverse pool of candidates to provide us with a depth of talent, skills and potential to meet our goals in all employment levels of our operation.*
- *We celebrate our diversified employee base and appreciate its cooperative power as a means to meet our business goals.*
- *We believe in doing all we can to support and enhance the quality of life of all Greater Philadelphians by engaging with the community in a meaningful way.*
- *We are committed to offer opportunities to diverse vendors, suppliers, contractors and other service providers from throughout the City of Philadelphia and surrounding counties to enhance the participation of such groups in the success of our facility.*
- *We require that our contractors and vendors practice equal opportunity policies when they deal with others who provide goods or services to us.*

Rivers Casino Philadelphia believes that when we partner with diverse persons and businesses, there are limitless opportunities to share knowledge and expertise, and to ultimately assist each other to grow and succeed.

LEADING TO WIN

A strategic plan must be driven from the highest levels of a company if the plan is to succeed. At Rivers Casino Philadelphia the ultimate responsibility for winning through diversity lies with the General Manager who will serve as the Chief Diversity Officer (the “Chief Diversity Officer”). The Chief Diversity Officer is responsible for strategic planning and evaluation of each department’s success in the implementation of the Diversity Plan. Rivers Casino Philadelphia will also have a designated diversity leader (“DL” or “Diversity Leader”) who will provide reports to the General Manager and operate with the authority of the General Manager to monitor the Diversity Plan and other related initiatives. The DL will be chosen annually from the members of the Diversity Task Force. The Diversity Task Force shall be comprised of Senior Team Members of the following departments: Human Resources, Finance, Compliance, Community Relations and Property Leadership. The Task Force will meet on a quarterly basis to ensure that Rivers Casino Philadelphia meets the commitments of this Diversity and Inclusion plan.

ORGANIZED TO WIN

The Diversity Leader, together with the Diversity Task Force, shall serve as the monitor for accountability for Team Member’s involvement in fulfilling the company’s Diversity and Inclusion Plan.

The Diversity Task Force

The Diversity Leader and Task Force duties shall include:

- Developing policy statements and diversity programs to effectuate the Diversity and Inclusion Plan.
- Developing and executing internal and external communication including:
 - The dissemination of the Diversity and Inclusion Mission Statement throughout the company as well as to business partners, prospective Team Members, Team Members, contractors and vendors.
- Identifying opportunities for improvement.
- Assisting line management in implementation of Rivers Casino Philadelphia Diversity and Inclusion Plan and in arriving at solutions to any perceived impediments.
- Designing and reporting information that will:
 - Measure the effectiveness of the Diversity and Inclusion Plan;
 - Identify areas with opportunities for improvement;
 - Determine the degree to which objectives have been attained;
 - Provide all required statistical reports and documentation to the Pennsylvania Gaming Control Board (the “PGCB”) as required.
- Serving as liaison between Rivers Casino Philadelphia and law enforcement agencies, workforce agencies focused on developing employment opportunities for minorities and women, community-based civic organizations, and other non-profit community service agencies.

- Performing periodic reviews of hires, promotions, terminations, job classifications, management and supervisory practices, work assignments, training, upward mobility programs, and other terms and conditions of employment as necessary, to ensure adherence to the goals of the Diversity and Inclusion Plan.
- Ensuring that the Diversity and Inclusion Plan’s Mission Statement is identified and posted in Team Member areas.
- Keeping Rivers Casino Philadelphia management and line supervisors informed of the latest developments pertaining to diversity and monitoring best practices in diversity among gaming companies with guidance from the American Gaming Association.
- Assisting the purchasing department in fulfilling the goal of creating participation opportunities for diverse groups in the supply of goods and services to the facility.
- Assisting the purchasing department in the development of a diverse vendor and supplier data base in order to better ensure participation by minority, women, and disadvantaged business entities (“M/W/DBE’s”).

Developing Winning Managers and Supervisors

Rivers Casino Philadelphia managers and supervisors are responsible for implementation of the Diversity and Inclusion Plan and the goal of winning through diversity. The responsibilities of managers and supervisors include:

- Assisting in the identification of opportunities for improvement and the establishment of unit objectives, which will be developed and reviewed on an ongoing basis.
- Encouraging all Team Members to participate in Rivers Casino Philadelphia’s Training and Development Programs.
- Encourage fair treatment of all Team Members and discouraging the harassment, intimidation or coercion of any Team Member.
- Encouraging all Team Members, to participate in company-provided training programs that can assist in their advancement.
- Promoting and fostering a collaborative work environment that celebrates and respects diversity.

WINNING PROGRAMS: DIVERSE TEAM MEMBERS AT ALL LEVELS OF THE COMPANY

Recruiting Practices

Rivers Casino Philadelphia will implement a number of concrete steps to ensure that this Plan is followed in the recruitment of team members at the Rivers Casino Philadelphia:

- Human Resources will notify all Managers on a regular basis of all open positions.

- A list of job openings will be distributed on a regular basis to recruitment sources, including workforce development agencies and community-based organizations that are equipped to reach disadvantaged populations.
- A list of job openings will be distributed on a regular basis to local colleges, universities, community colleges, trade schools and other organizations that are involved in higher education.
- Rivers Casino Philadelphia will also have an informational employment section on its website explaining our Diversity Mission Statement and list available job openings, and when possible, links to community action agencies with which Rivers Casino Philadelphia have partnered.
- Available positions at Rivers Casino Philadelphia will be posted on our Company web-site with a brief description and minimum requirements; so that all qualified internal Team Members and qualified external applicants will have an opportunity to apply.
- When advertising for employment opportunities Rivers Casino Philadelphia will advertise using typical advertising means and will include advertising in minority publications in Philadelphia Metropolitan area, and other publications designed to reach a diverse pool of applicants.
- Human Resources/the Diversity Leader will take appropriate measures to identify and coordinate recruitment efforts with employment sources serving disadvantaged and minority persons.
- The Human Resources Department in collaboration with the Diversity Leader/Task Force will review and implement on a regular basis additional way to improve the pool of diverse candidates for all openings.

Job Postings

Job positions will be posted for a minimum of three (3) days and maintained on the Careers section of the Rivers Casino Philadelphia website and/or other areas of the casino.

Applicant Referral Process

- All applicants, internal and external, shall be referred to Human Resources.
- Human Resources will identify all qualified internal applicants for positions and refer them to Department Managers for consideration.
- Human Resources will identify all qualified external applicants for position openings, once The position has been posted on the company website www.riverscasinophiladelphia.com/careers-employment/ and/or other areas of the casino for a minimum of three (3) days. All qualified applicants will be referred to Department Managers to be interviewed.

College Recruitment

The Human Resources Department will issue notices to career service departments of colleges and universities on a local, state and national level, informing them of our Diversity and Inclusion Mission Statement and initiatives to promote a diverse workforce and will inform them of Rivers Casino Philadelphia's interest in interviewing students and graduates whose educational training and background have prepared them for opportunities within our industry.

Career Fairs

Human Resources and/or the Diversity Leader and Task Force members or their representatives shall attend career fairs in which minorities and women traditionally participate and distribute information which describes the job opportunities available and company sponsored training programs.

Leadership Development

Rivers Casino Philadelphia provides internal development opportunities for all team members. Each team member has the opportunity to continue to develop as part of their career path and succession planning for progressive responsibilities. Each Department Leader will have the responsibility to develop Team Members for advancement within the company and encourage each team member to take advantage of the necessary training that will enable them the opportunity to qualify for a current or future open position. The Vice President of Human Resources/Task Force/ Diversity Leader will monitor each department to ensure that all Team Members are given the opportunity to participate in all programs for advancement.

Diversity Awareness Training for Team Members

As part of Rivers Casino Philadelphia's core courses, all team members will be required to complete the Diversity Awareness Training Program during employee orientation. This Diversity training will focus on building an awareness of the valued differences of fellow team members and guests. Our diversity training efforts will be designed to ensure that all team members are aware of the company's diversity philosophy, and incorporate this philosophy in their day to day practices within the workplace. In order to provide the very best guest service, it is necessary for our team members to understand the importance and have an appreciation of people's differences. In addition *all* current team members are required to complete the Workplace Diversity Guidelines Course once a year.

Complaint Resolution Process

Rivers Casino is committed to maintaining a productive work environment, free of any conduct in violation of the Anti-Harassment and Anti-Discrimination policy. Rivers Casino Philadelphia will encourage fair treatment of all Team Members and discourages the harassment, intimidation or coercion of any Team Member. The following process to resolve discrimination and harassment complaints will be as follows:

- In the event that any conduct perceived to be in violation of the Anti-Harassment and Anti-Discrimination policy occurs, Team Members are encouraged to immediately report the matter to their department supervisor/manager or any other supervisor/manager with whom the Team Member feels comfortable. If a Team Member is unsure of with whom to raise a concern, or if a

Team Member has not received a satisfactory response within five business days after reporting any incident of what the Team Member perceives to be a violation of the Anti-Harassment and Anti-Discrimination policy, they should immediately contact the Vice President of Human Resources or a management level HR Team Member. Team Members also have the option of contacting River's Casino's Ethics Hotline at (866) 934-2417 to report any such concerns.

- Human Resources will see that an investigation is timely conducted. Every report of perceived harassment will be appropriately investigated, and corrective action will be taken where appropriate. Rivers Casino will attempt to protect the confidentiality of harassment complaints to the extent consistent with an appropriate investigation and within the constraints of applicable law.
- Violation of this policy will result in disciplinary action, up to and including discharge for any Team Member who violates this policy. In addition, Rivers Casino prohibits any form of retaliation by any individual against individuals who in good faith report a perceived violation of this policy or who cooperate in the investigation of such reports in accordance with this policy and Rivers Casino will take appropriate disciplinary action for any such retaliation.
- Any supervisor or manager who becomes aware of conduct in violation of the Anti-Harassment and Anti-Discrimination policy must immediately advise the Human Resources Department so it can be investigated in a timely manner. If requested, all Team Members are required to provide assistance in any investigation. Failure to participate may be grounds for disciplinary action, up to and including termination, unless the refusal to participate is legally protected.

WINNING PROGRAMS: COMMITMENT TO OUR COMMUNITY

Rivers Casino Philadelphia will maintain their commitment to be a dedicated neighbor and partner. Rivers Casino Philadelphia will promote corporate social responsibility to diversity and inclusion through their program, Rivers Gives.

- Support the Penn Treaty Special Services District through a yearly donation, in accordance with the Community Benefits Agreement.
- Support non-profit, social service and city organizations through strategic partnerships.
- Create volunteer opportunities for Team Members.
- Manage a robust charitable giving program that provides essential funding to partners.
- Identify engagement opportunities in at-risk communities, including recruitment and procurement.
- Collaborate with internal departments to help increase awareness for Rivers Casino Philadelphia.

WINNING PROGRAMS: DIVERSE SUPPLIERS AND VENDORS

The Vice President of Finance and the Diversity Leader will share the responsibility for identifying and encouraging the participation of minority, disadvantaged, and women-owned businesses.

The Diversity Leader and Vice President of Finance will encourage representation and participation of diverse groups in the ownership and operation of businesses that will serve the facility and provide goods and services to the facility. We are committed to procuring goods, products, and services from a diversified pool of vendors and professional service providers. Our strategy is to work with a broad range of suppliers that are competitive in quality, service, and price. All suppliers are encouraged to support diversity efforts

through the use of second-tier supplier programs.

Rivers Casino Philadelphia will take the following actions:

- Rivers Casino Philadelphia will utilize the list of the minority and women’s business enterprises that are pre-qualified by the Bureau of Minority and Women’s Business Enterprises of the Pennsylvania Department of General Services to seek goods and services from diverse vendors.
- Rivers Casino Philadelphia will “partner” with local organizations within the Greater Philadelphia Metropolitan area, including but not limited to, the City of Philadelphia Office of Economic Opportunity, the African-American Chamber of Commerce of PA, NJ and DE, the Asian-American Chamber of Commerce of Greater Philadelphia, the Greater Philadelphia Hispanic Chamber of Commerce, the Minority Supplier Development Council of PA, NJ and DE, the Women’s Business Enterprise Council of PA, DE, and NJ, and the Pennsylvania Minority Business Enterprise Council.
- Rivers Casino Philadelphia will make available on its website www.riverscasinophiladelphia.com information describing procurement needs, processes and general contract information. Additionally, the company’s website provides informational assistance, such as vendor licensing requirements.
- Rivers Casino Philadelphia purchasing personnel will help qualified vendors and suppliers (as defined by the Pennsylvania Department of General Services), where necessary, by providing pertinent information and feedback so that they can compete effectively on price, service and product quality.
- Rivers Casino Philadelphia personnel will track dollar volume and performance of suppliers and vendors and provide reports/data to the Diversity Leader to monitor compliance with the Diversity Plan.
- Rivers Casino Philadelphia through the Diversity Leader will be collecting data and issuing reports needed for periodic diversity reporting, including quarterly participation reports as defined and required by PGCB.
- Rivers Casino Philadelphia will be working with the Vice President of Finance and Diversity Leader on development of an M/W/DBE network and the implementation of the Diversity Plan.
- Rivers Casino Philadelphia purchasing personnel and internal end-users will be trained on supplier diversity policies and procedures and compliance requirements.

WINNERS NEVER QUIT: AUDIT AND REPORTING SYSTEM

At Rivers Casino Philadelphia, we know that we were aiming high when we set Winning Through Diversity as our goal. Consequently, our plan for winning includes self-scrutiny because winning means always setting the bar higher.

pInternal Progress Reports

The Diversity Leader and Task Force shall monitor company progress to carry out the Diversity and Inclusion Plan. The DL/Task Force shall receive employment and procurement activity reports for each department and M/W/DBE participation reports, at a minimum on a quarterly basis. These reports shall be used to compile a periodic progress report to be submitted to the Diversity Plan Task Force for review and comments. The Task Force shall assist department managers and supervisors and project site managers by

recommending specific actions.

Report of Participation

Rivers Casino Philadelphia shall file a quarterly report with the PGCB which sets forth the Company's performance in fulfilling the goals of this Diversity and Inclusion Plan. The report shall contain all of the following:

- Employment data, including information on minority and women representation in the workforce in all job classifications; average salary ranges; and recruitment and training information, including executive and managerial level recruitment and training; and retention and outreach efforts.
- The total number and value of all contracts and/or subcontractors awarded for goods and services.
- An identification of each subcontract actually awarded to a minority or women-owned business enterprise under contracts containing a participation plan during each calendar quarter and the actual value of each such subcontract.
- A comprehensive description of all efforts made by the licensed entity or applicant to monitor and enforce the participation plan.
- Information on minority and women investment, equity ownership, and other ownership or employment opportunities initiated or promoted by the licensed entity.
- Other information deemed necessary or desirable by the PGCB to ensure compliance with the rules and regulations governing gaming in Pennsylvania.