



Diversity, Equity & Inclusion Plan

Live! Casino and Hotel Philadelphia
2021

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DIVERSITY VISION AND MISSION

Live! Casino and Hotel Philadelphia (“Live!”) values its Team Members and business partners as integral keys to its success. Live! has established this Diversity and Inclusion Plan to assure that all its policies and practices support the central goal of equal opportunity in all aspects of employment, procurement, contracting and community involvement. Each component of this Diversity and Inclusion Plan is designed to enable Live! to reach its goal of being an employer of choice and the region’s premier choice for gaming and entertainment.

Live! Casino and Hotel’s vision for diversity and inclusion is to leverage the unique talents, strengths, and assets of our Team Members and business partner community in order to provide the region’s overwhelming first choice of gaming and entertainment. Live! will continuously strive to maintain an environment in which everyone feels valued, accepted, and rewarded as an integral part of the team. We encourage Team Members to understand and recognize difference and to appreciate the contributions that all diverse groups and individuals bring to the system. Our top management believes in the value of a diverse and inclusive work force.

STATEMENT OF GOALS

- We are committed to establishing a diverse workforce by ensuring consistency, fairness and inclusion in the recruitment, selection and the career development process.
- We promote diversity by ensuring equal opportunity in the procurement of contractors, sub-contractors, assignees, lessees, agents and suppliers.
- We are focused on create an open and welcoming atmosphere at all our properties where team members, guests and vendors feel comfortable and welcome.
- We actively seek out minority and women and other historically underrepresented groups to provide opportunities for them to bid on providing services and/or supplies.
- We are committed to being a strong financial supporter of a diverse number of worthwhile community charities and non-profit organizations through our community reinvestment and giving programs.

LEADERSHIP ROLES AND RESPONSIBILITIES

General Manager Responsibilities

The property General Manager is ultimately accountable for ensuring that the appropriate DEI activities are being executed and documented as outlined in this plan. The General Manager champions all DEI related activities and regularly communicates the company’s plan and goals, while providing all the necessary tools and resources needed to successfully execute the plan.

Vice President of Human Resources Responsibilities

The Vice President of Human Resources champions DEI related efforts to ensure there is an inclusive approach and efforts are developed and implemented across all departments. The Vice President of Human Resources monitors and regularly reports on the adherence, consistency

and value of all diversity efforts and ensures that the property is providing the best and good faith effort to achieving its Team Member diversity employment goals. In addition, the Vice President of Human Resources ensures that DEI Council objectives are being met.

Chief Financial Officer Responsibilities

The property Chief Financial Officer is responsible for ensuring all good faith efforts are made in the procurement of the property M/W/DSBE's goals. This includes seeking bids from professional services and suppliers of under-represented groups. The Chief Financial Officers is also strong financial supporter of diverse community charities and non-profits through our community reinvestment and giving programs

Senior Property Leader Responsibilities

Directors, Vice Presidents and Senior Vice Presidents are considered Senior Leaders on property. Senior Leaders are responsible for ensuring that DEI efforts and activities are carried out in accordance with the plan in each of their departments. Senior leaders should ensure that Diversity, Equity and Inclusion is alive and celebrated in each of their departments.

DIVERSITY, EQUITY & INCLUSION COUNCIL (PROPOSED 2022 ROLLOUT)

At Live! Casino and Hotel Philadelphia, the General Manager, SVP of Finance, and the VP of Human Resources act as the **Executive Sponsors** for the Diversity, Equity & Inclusion Council.

COUNCIL COMPOSITION

The Diversity Council, will consist of the following individuals:

- Director of Human Resources
- Director of Guest Services
- Director of Purchasing
- Executive Director of Communications
- Talent Acquisition Manager
- Selected Representatives from Various Departments and Demographics
- Corporate and External Consultants

DUTIES AND RESPONSIBILITIES

The DEI Council will serve as advisors who provide council, direction, support, and resources to the Local Champions Board including :

- Act as the governing body to ensure compliance in all DEI Local Champions Board activities
- Championing initiatives that bring cultural awareness and acceptance to the workplace, arriving at solutions to perceived obstacles.

- Developing and executing internal and external communications
- 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.

Local Champions Board

- The Local Champions board will report to the DEI Advisory Council and represent a cross-section of Team Members from organizational departments and representative of demographic groups.

Local Captains

- The local captains will report to the Local Champions Board. Each Captain leads a different area of responsibility, intending to improve outcomes and engagement in the following areas:
 - Business Operations:
 - Ensuring key business decisions are focused on DEI goals.
 - Talent Development:
 - Ensuring hiring and recruiting practices are equitable.
 - Creating impactful onboarding experiences
 - Assisting in identifying recruiting pools.
 - Build support/mentor networks.
 - Education:
 - Planning and executing events that help educate Team Members including guest speakers and webinars.
 - Community:
 - Planning and executing community volunteering and giving events.
 - Enhancing employer brand and support communities in need with vital resources
 - Creating inclusive community opportunities through networking and mentoring
 - Events:
 - Planning and managing celebrations, social events, and outings.

RECRUITMENT AND EMPLOYMENT PROGRAMS

Live! Casino and Hotel has instituted initiatives to achieve specific diversity and inclusion action goals.

- Live! Casino & Hotel Philadelphia, in its efforts to grow a diverse employee base reflecting the ethnic composite of the city, turned to experienced community and government affairs professionals to develop “best practices” for diversity recruitment and retention.
- Live! Casino & Hotel Philadelphia continue to work closely with stakeholders representing the African American, Latino, Asian, Veteran, Mentally and Physically Challenged, LGBTQ and other diverse communities.

- Live! Casino & Hotel Philadelphia seeks the assistance and guidance of numerous elected officials, government agencies and nonprofits for community engagement to attract qualified minority candidates for job placement, including:
 - Job Recruitment Flyers distributed through social media and monthly newsletters.
 - Virtual Job Fairs and Training Workshops
 - Onsite Job Fairs and Training Workshops
 - Direct Referrals through Live! Online Portal
 - Robo Calls via Local Leadership
 - Targeted Radio Interviews & Local Spots
 - Television Campaigns and Local News coverage
- Live! Casino will recruit and select qualified college graduates to participate in the Live! Management Development Program (MDP) to train and develop them for leadership positions in the company and industry.
- Live! Casino will select qualified current leaders within the organization to participate in the Leadership Enrichment and Development Program (LEAD) to aid their knowledge and professional growth within the organization.
- Live! Casino will continue to evaluate the candidate selection process to ensure freedom from bias by:
 - Reviewing employment related documents to include job applications and pre-employment inquiries to ensure information request is job related.
 - Evaluating recruiting and selection methods to assure they target a broad range of prospective applicants; and
 - Training leadership team on proper interview techniques.
 - Making job descriptions available to recruiting sources and all members of management involved in the recruiting, screening, selection, and promotion processes.
 - Posting open jobs on the external careers and/or the internal careers section of the Live! Casino website; include the phrase “Equal Opportunity Employer” in digital and printed employment advertisements.

DEI EMPLOYMENT PRACTICES

EQUAL OPPORTUNITY POLICY

Live! Casino & Hotel is an equal employment opportunity employer. Live! Casino & Hotel will recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, national origin or ancestry, sex, age, marital status, sexual orientation, gender identity, genetic information, disability, veteran status, or any other legally protected status under local, state, or federal law. The Company will make employment decisions that further the principle of equal employment opportunity. The Company will ensure that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid and nondiscriminatory requirements for promotional opportunities. The Company also will ensure that all personnel

decisions and actions, including but not limited to, compensation, benefits, transfers, promotions, layoffs, returns from layoff, discipline, terminations, Company-sponsored training, education, and social and recreation programs will be administered without regard to race, color, religion, national origin or ancestry, sex, age, marital status, sexual orientation, genetic information, disability, veteran status, or any other legally protected status under local, state, or federal law.

NON-DISCRIMINATION COMMITMENT

Live! Casino & Hotel, consistent with its philosophy of equal employment opportunity, reaffirms its policy of non-discrimination against qualified individuals in its employment practices, including job application procedures, recruiting, advertising, hiring, termination, advancement, compensation, training and other terms, conditions and privileges of employment, in accordance with federal, state and local laws.

Live! Casino & Hotel also reaffirms its policy of non-discrimination against qualified individuals with disabilities in all its employment practices, including job application procedures, recruiting, advertising, hiring, termination, advancement, compensation, training and other terms, conditions and privileges of employment. It is the Company's policy to evaluate all applicants on the basis of their qualifications without regard to any disability to the extent required by law. Likewise, all Team Members can expect to be treated equally in all employment decisions without regard to disability to the extent required by law.

OPEN DOOR POLICY

We strongly encourage team members to share concerns, seek information, provide input, and resolve problems/issues with their supervisor. Management is expected to listen to team member concerns, to encourage their input and to seek resolution to problems/issues.

Live! Casino & Hotel is committed to an Open-Door Policy with regards to work related questions, or problems that may concern a Team Member. Team Members who have issues pertaining harassment, discrimination or retaliation should follow the specific procedures set forth in the Discrimination, Harassment and Retaliation Policy, located in the Team Member Handbook. This policy encourages team members to have a discussion with their supervisor first. If the team member believes that that would be unproductive or they have attempted to address the concern with their supervisor and the situation remains unresolved, the team member may then contact their department manager or a member of the human resources team.

Additionally, Live! Casino & Hotel has provided an electronic forum, located in the Team Member Dining Room (TDR), that allows every Team Member to communicate directly to management with suggestions or concerns, or to supply information that may be relevant to business operations.

ANTI-HARASSMENT POLICY

Live! Casino & Hotel is committed to providing a work environment that is free from all forms of unlawful harassment, intimidation or retaliation for opposing such conduct. Live! Casino and Hotel will comply with all applicable federal/state and local laws relating to harassment in the workplace. Live! Casino and Hotel does not tolerate any form of harassment, joking remarks or other conduct (including verbal, non-verbal, or physical conduct) that demeans or shows hostility toward an individual based on these prohibited reasons and that creates an intimidating, environment, unreasonably interferes with an individual's work performance or otherwise adversely affects an individual's employment opportunities. Discrimination or harassment of a Live! Casino & Hotel Team Member, whether by another Team Member, customer, supplier, vendor, or other individuals present in the work environment, will not be tolerated.

Harassment may take many forms including:

- Verbal conduct such as epithets, derogatory comments, slurs or unwanted comments, jokes
- Visual conduct such as derogatory posters, cartoons, drawings or gestures
- Physical conduct such as assault, blocking normal movement, restraint, touching or other physical interference
- Threats, demands to submit to certain non-work-related conduct or perform certain non-work-related actions in order to keep a job, avoid some other loss, as a condition of job, benefits or security.
- Sexual harassment includes unwelcomed sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature
 - Submission to such conduct is either explicitly or implicitly a term or condition of employment;
 - Submission to or reflection of some conduct by an individual is used as basis for employment decisions affecting the individual;
 - Such conduct has purpose or effect of unreasonably interfering with individual's work performance; or
 - Such conduct has purpose or effect of creating an intimidating, hostile or offensive working environment

All Team Members have a right to work in an environment free of discrimination, which includes freedom from harassment. Live! Casino & Hotel prohibits unlawful harassment of its Team Members in any form. Such conduct may result in disciplinary action up to and including dismissal.

ANTI-RETALIATION POLICY

Live! Casino & Hotel strictly prohibits any form of retaliation against any Team Member or applicant who has:

- Made a good faith complaint as to an incident of harassment, discrimination or retaliation in violation under this policy.
- Any other Team Member who cooperates in any manner in a good faith investigation of a complaint.

Prohibited retaliation includes, but is not limited to: termination, demotion, suspension, and failure to hire or consider hiring, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit. Any person who engages in retaliatory conduct of any type may be subject to disciplinary action, up to and including termination.

COMPLAINT RESOLUTION POLICY

All Team Members are required to ensure that Live! Casino & Hotel maintains a workplace that is free of harassment, discrimination, and retaliation. These Policies place an obligation on all Team Members on duty to promptly report any harassment or discrimination that they have been subjected to, witnessed, or of which they become aware. If any Team Member is subjected to, has witnessed or has become aware of any harassment in violation of any of these Policies, that Team Member must notify his or her direct Supervisor immediately. All Supervisors and Managers are required to immediately report all complaints that come to their attention under this policy to the Human Resources Department. All internal investigations are to be administered by either the Human Resources or Surveillance Department. If a Team Member is unable or uncomfortable about discussing this issue with his or her department head, then the issue must be reported immediately to the Human Resources Department.

No Team Member will be retaliated against for making a complaint or for cooperating in the investigation of complaints. The Company considers retaliation to be a serious violation of this Policy and requests Team Members to report any incidents of retaliation immediately to the Human Resources Department or to the General Manager. The Company will investigate and resolve reports of retaliation or false allegations and Team Members may be subject to disciplinary action up to and including termination of employment.

VENDOR AND SUPPLIER DIVERSITY

Live! Casino strives to ensure all best and good faith efforts are made toward the property's vendor and supplier diversity and inclusion goals.

DEFINITIONS

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.

LBE Local Business Enterprises

Business located in the state of Pennsylvania.

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/WBEMinority 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.

KEY VENDOR AND SUPPLIER DIVERSITY ACTIONS

Live Casino strives to deliver on the best and good faith efforts in our Vendor and Supplier Diversity and will ensure the following actions:

- Review and improve our supplier diversity website for MBE, WBE and DBE online registration.
- Build internal processes and tracking mechanisms that drive vendor and supplier diversity actions.
- Be an active participant 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.
- Host regular vendor meetings with our buyers to discuss enriching business partnerships through DEI.
- Identify opportunities to mentor MBE, WBE businesses to include them in our supplier pipeline.

COMMUNICATION AND DISSEMINATION OF PLAN CONTENTS

Live! Casino Pittsburgh understands that communication and understanding of this plan at all levels is vital to our success. Dissemination of information shall include the following:

INTERNAL COMMUNICATION

- DEI company policies will be available to all team members in the Live! Handbook, accessible in electronic form on a team site.
- Live! will train all team members at all levels on the DEI goals and best practices.
- Live! will post all relevant DEI information in team member communication areas back of house.

INTERNAL AUDITING AND REPORTING

The Diversity Council is responsible for the effective implementation of the Diversity Plan; however, responsibility is likewise vested with each member of management. The following documents are maintained as a component of the Live! Casino and Hotel's internal audit process:

- Completion of EEO-1 Reporting.
- Summary data of external job offers hires, promotions, resignations, terminations, and layoffs/reductions.
- Utilization and recording of self-identification forms.
- Applicant information report showing relative information for qualified candidates.
- Evaluation of employee relations incidents to include terminations and grievances.
- Reporting on vendor/contractor business volumes with MBE/WBE/DBE
- Statistics on contacts and partnerships with outside organizations in furtherance of diversity outreach efforts.
- Filing quarterly and annual reports on Diversity Plan compliance with the PA Gaming Control Board and other appropriate regulatory agencies.
- All other information deemed necessary or desirable by the PGCB to ensure compliance with the rules and regulations governing gaming in Pennsylvania.