



Diversity Plan

Valley Forge Casino Resort

April 2016



Table of Contents

- *Overview*
 - *Governance & Responsibilities*
 - *Diversity Council*
 - *Responsibilities of Management*
 - *Employee Involvement Committee*
 - *Employment Policies and Practices*
 - *Diversity Statement, Policies and Practices*
 - *Fair Treatment Policy*
 - *Open Door Policy*
 - *Appeals Process*
 - *Anti-Harassment Policy and Procedure*
 - *Communication and Dissemination of all Diversity and Code of Conduct Practices*
 - *Employment Programs*
 - *Job Descriptions*
 - *Training and Development*
 - *Hiring and Selection*

 - *Business Opportunities*
 - *Governance*
 - *Awareness*
 - *Solicitation*
 - *Outreach*
 - *Communication and Dissemination of Plan Contents*

 - *Internal Audit and Reporting*
-
-



I. Overview

Valley Forge Convention Center Partners, LP d/b/a “Valley Forge Casino Resort (“VFCR”) values its employees and business partners as integral keys to its continuing success. To that end, VFCR has established this Diversity Plan to assure that all of its business policies and practices support and actively promote the central goal of equal opportunity in all aspects of employment, procurement, contracting and community involvement.

By assuring equal access to all of the company’s business and employment opportunities, VFCR will achieve the following objectives:

- A diverse workforce and diverse business partners that reflect the communities in which we exist;
- A diverse work environment with policies, procedures and programs that support and encourage the principles of diversity;
- A diverse workforce where employees are respected and cultivated as valued individuals key to the company’s growth and success;
- Improved patron relations through better understanding of varying backgrounds and presenting positive business practices;
- Increased cooperation, collaboration and team-building amongst the workforce members; and
- Enhancing our surrounding communities through inclusion of all cultures.

VFCR’s Diversity Plan is designed to ensure Equal Employment Opportunity. Our plan includes action-orientated programs. The company is committed to internally auditing, monitoring and measuring progress toward achieving our goals of promoting and cultivating diversity. VFCR is proud of the history of its facility in maintaining a highly-diverse workforce and looks forward to continuing that tradition as its entertainment offerings expand.



II. Governance & Responsibilities

While the ultimate responsibility to achieve the objectives of this Diversity Plan rests with VFCR's President and Chief Executive Officer, successful implementation requires the concerted efforts of all management and staff accepting the tenets of this plan's philosophy as an integral part of their daily activities.

III. Diversity Council

Overseeing implementation of the Diversity Plan will be a Diversity Council comprised of the President & CEO, Vice President of Human Resources, Vice President of Finance, Managing Director of Operations, and the Director of Human Resources. The Diversity Council may invite additional participation from other management or associates, including women, racial/ethnic minorities and/or disabled persons and outside counsel. Specific areas of responsibility include, but are not limited to:

1. Vice President of Human Resources & Diversity

- Developing Equal Employment Opportunity (EEO) statements, policies, programs and internal and external communication procedures in support of the goals of this Diversity Plan;
- Assisting in the identification of EEO problematic areas including receiving, reviewing and resolving any complaints of discrimination or other non-compliance with regards to equal opportunity and fair treatment of all employees;
- Assisting management in arriving at effective solutions to problems;



- Designing and implementing internal reporting systems that measure the effectiveness of VFCR programs designed to support a company culture which fosters diversity in all aspects of goal attainment;
- Keeping the Diversity Council informed of equal opportunity progress through quarterly reports;
- Reviewing the company's Diversity Plan with all members of management at all levels to ensure that the Plan is understood and is followed in all human resources activities; and
- Auditing the company's internal and external posting to ensure compliance information is posted in conjunction with policies and procedures.

2. Responsibilities of Management

It is the responsibility of VFCR's management team to implement this Diversity Plan. These responsibilities include:

- Assisting in the identification of potential problem areas, formulating solutions and establishing departmental goals and objectives;
- Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion transfer, and termination actions occur;
- Conducting job performance appraisals in a manner which cultivates an environment of job development and equal opportunity for all employees alike; and



- Ensure awareness of the company’s diversity initiatives at all levels of operation.

3. *Employee Involvement Committee*

A true focus on Diversity and Inclusion actively involves all employees. That said, VFCR (with support and structure from the HR department), created an Employee Involvement Committee to develop and implement specific strategic initiatives that would grow our spirit of hospitality, inclusion and diversity. Specific areas include:

- *Community Involvement/Awareness*
- *Employee Recognition & Rewards*
- *Special Employee Events & Activities*

Engagement Ambassadors are selected for an annual term and act as representatives for departments and other assigned areas. Primary to their role is the opportunity to not only develop new programs, but to encourage involvement and participation with our employees in order to build relationships within the diverse community we serve. This grass roots commitment provides our employee with a greater sense of pride, philanthropy, and team cohesion.

IV. Diversity Statement

Valley Forge Casino Resort believes that each employee is an integral part of its success and is committed to the principles of diversity and equal opportunity.

V. Diversity and Equal Employment Opportunity Policy

Purpose: Establishes Company expectations for compliance with all legal regulations governing fair employment opportunities for all individuals, to create a company culture which fosters fairness and equal opportunity in regards to hiring, employment, compensation, benefits and working conditions.



It is the policy of VFCR to comply with the requirements and all applicable laws including equal employment opportunity (EEO) laws. Toward this end, it is the policy of VFCR to make all employment decisions without unlawful regard or consideration of an individual's race, color, creed, religious belief, national origin, ancestry, genetic information, gender, sexual orientation, marital status, political belief, age, physical or mental disability, veteran status or any other protected classification

As part of its policy, VFCR prohibits discrimination in employment against otherwise qualified applicants and employees with a physical or mental disability. VFCR will provide reasonable accommodation to individuals with a physical or mental disability if such accommodation would not impose an undue hardship on VFCR, and would not enable the individual to apply for and satisfactorily perform the essential functions of the position.

It is the responsibility of every employee to ensure that discrimination of any of these unpermitted bases does not occur in connection with the recruiting, interviewing and hiring process, or in any conditions of employment in the workplace. It is not a violation to enact certain bona fide qualifications to a required job person or persons. All persons employed in a gaming area must be at least 18 years old. No person under the age of 21 is allowed to enter gaming areas.

It is the responsibility of all managers to see that company policy of equal opportunity is communicated throughout the organization. Management is primarily responsible for seeing that VFCR's equal employment opportunity policies are implemented, but all members of the staff share in the responsibility for assuring that by their personal actions the policies are effective and apply uniformly to everyone. All employees are assured an equal opportunity to make the maximum contribution to VFCR and also to further their own professional growth and development.



VFCR believes diversity in procurement is very important to its success and is committed to applying the same underlying principles of diversity and equal opportunity to its procurement and contracting practices. All management and staff will assure that opportunities for doing business with VFCR are open to all qualified vendors and contractors and, to that end, outreach efforts will be made to identify and include in those opportunities certified minority-, women-, and disabled-owned enterprises.

VI. Fair Treatment

1. Fair Treatment Policy

Purpose: Establishes VFCR's procedures for providing employees with the opportunity to raise complaints, report problems and openly discuss matters relating to employment to management. Managers are expected to treat all employees in a respectful manner and provide an environment where growth and development is achievable for all employees.

2. Fair Treatment Commitment

VFCR is committed to providing the best possible climate for development and goal achievement for all employees. We seek to develop a spirit of teamwork; individuals working together to attain a common goal.

VFCR believes in the principles of respect and equal opportunity for our professional and individual growth and development. We seek to do everything we can to make certain that we are providing competitive pay and benefits, including health insurance, paid time off and training opportunities to match programs with people and skills similar to yours. We actively seek and respond to employee opinions on all aspects of their jobs. We value employees from various backgrounds and approach issues and problems from different perspectives.



In order to maintain a culture where these goals can be accomplished, the Company provides a comfortable and progressive workplace. Most importantly, our standard is to create and endorse a workplace where communication is open and problems can be discussed and resolved in a mutually respectful atmosphere.

- We believe we can solve issues together.
- We take pride in our problem solving process, we urge employees to use our open door policy if they feel there is a problem. All employees may bring any concerns, issues or suggestions to their supervisor, the Office of Human Resources or any other member of management.
- We firmly believe that through direct communication, we can continue to resolve any difficulties that may arise and develop a mutually beneficial relationship.
- It is the responsibility of all managers to see that VF CR's policy of Fair Treatment and a culture of respect are implemented throughout the organization.

VF CR's policy is to treat each employee fairly and consistently. We practice a non-retaliation policy which protects employees from retribution for expressing a problem, concern, issue or suggestion.

Open Door Policy

Valley Forge Casino Resort practices an Open Door Policy which provides for the timely resolution of employee problems, misunderstandings, and complaints while allowing sufficient time for fact finding and clarification. No employee will be reprimanded, harassed, or retaliated against for utilizing the Company's Open Door Policy.

We strongly encourage employees to share concerns, seek information, provide input, and resolve problems/issues through their supervisor. Management is



expected to listen to employee concerns, to encourage their input, and to seek resolution to their problems/issues.

If an employee has employment-related concerns or questions, he/she is encouraged to discuss them with their supervisor. If the employee believes that such a conversation would not be productive, or if they have attempted to address the concern directly with their supervisor and the situation remains unresolved, he/she may contact their department manager, a member of Human Resources or another appropriate member of management.

The manager or Human Resources professional will assist the employee as reasonable and appropriate to seek resolution to the employee's concern. In reviewing the matter, the employee may be asked to meet with their supervisor, department manager or other member of management, review and provide explanation to relevant facts and documents, or any other measures necessary for a full understanding of the situation.

Under no circumstances will an employee be penalized or retaliated against for presenting a good-faith complaint to their supervisor or to members of management.

Appeal Process

Should an employee feel that their issue was not resolved fairly or in accordance with our Open Door practices, he/she may appeal the decision. Such appeals are to be made in writing, within seven (7) business days.

Employees who have completed their introductory period in their current position (90 days) may request an Appeal of certain disciplinary actions if they feel job-related performance issues have not been resolved through the department



supervisor, manager, director or Human Resources department. An employee may request an Appeal for several performance decisions, including:

- Written Warning
- Final Written Warning
- Separation

The company handbook outlines specific circumstances when a request for an appeal may be denied including but not limited to arrests, indictment of crime or revocation of a required license.

The Appeal Panel is made up of three impartial members as follows:

1. An employee participant from the employee's department.
2. A management level participant having no supervisory authority over the employee's department.
3. A Human Resources professional who has not been involved in the employee's issue.

The decision is made on the basis of facts and evidence presented to the Appeal Panel. The Appeal Panel can make one of the following decisions:

- Uphold the discipline
- Modify the discipline
- Overturn the discipline

Under no circumstances will an employee be penalized or retaliated against for presenting a good-faith complaint to the supervisor or to members of management.

VII. Anti-Harassment Policy and Procedure



1. Anti-Harassment Policy

Purpose: Establishes VFCR's policy and commitment to provide a work environment that is free from all forms of harassment, intimidation or retaliation for opposing such conduct. VFCR will comply with all applicable federal/state and local laws relating to harassment in the workplace.

As part of its policy to comply with all applicable EEO laws, VFCR prohibits harassment on the basis of sex (with or without sexual conduct), race, color, religious creed, national origin, age, citizenship, pregnancy, childbirth or related medical condition, physical or mental disability, sexual orientation, service in the uniformed armed forces, genetic information, or other characteristic covered by applicable state or local EEO law.

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

Verbal, physical or sexual harassment can occur between men and women, members of the same sex, employees, and or vendors of VFCR. Sexual harassment is unacceptable in the workplace itself and at other work-related settings such as business trips and business-related social events on and off property.

Complaint Procedure:

Discrimination or harassment will not be tolerated by employees, supervisors, managers, or non-employees who conduct business with the Company. It is the responsibility of every employee and person providing services to the Company under contract, to ensure that harassment of any of these unpermitted bases does not occur.

The Company supports and encourages reporting of all incidents of harassment, regardless of whom the offender may be, and will promptly investigate all reported incidents. To the fullest extent practicable, the Company will keep complaints and the terms of the resolution confidential. To this end, parties involved in an allegation of harassment may be asked to sign a confidentiality agreement during the course of the investigation. Where the alleged offender is not an employee, the Company's management, in consultation with the complainant, will review the complaint and make every effort to identify a reasonable remedy with the parties involved.

All Company employees are responsible to help ensure that we avoid all types of harassment. Any company employee who believes she/he is the subject of harassment



or discrimination on the bases enumerated above or has observed harassment or discrimination or believes he/she has observed should immediately contact, verbally or in writing, in confidence his/her supervisor/manager, General Manager or human resources professional. If the incident happens to involve the employee's supervisor/manager, or the employee would prefer not to report the incident to his or her supervisor/manager, the incident should be reported to the General Manager or Director of Human Resources. Every effort will be taken to promptly and thoroughly investigate any allegation of harassment or discrimination in as confidential a manner as possible. Employees who learn of a complaint or investigation, or who are interviewed as part of an investigation are to refrain from casual discussions with others, who have no business to know the facts or circumstances of a complaint or investigation. Employees should take care not to participate in the spread of gossip or rumors, which is never constructive, and merely distract and disrupt employees from work. Any employee who knowingly communicates false or misleading information, whether in the course of an investigation or otherwise, or who interferes with or undermines an investigation, will be subject to discipline. In all cases, the employee who registered the complaint will be apprised of relevant findings and conclusions. The Company will promptly take any applicable corrective action.

If an employee is not satisfied with the handling of a complaint or action taken by the investigator, the employee should bring complaint to the attention of the CEO of Gaming or the Managing Director.

No manager is authorized to agree to "do nothing" or to keep confidential from Human Resources any complaint, report or concern regarding possible discrimination or harassment. Any manager, who learns of such conduct, whether or not such employee is under his or her supervision, must promptly contact Human Resources.



Where a hostile work environment has been found to exist, VFCR will take all reasonable steps to eliminate the conduct creating such an environment.

If an investigation results in a finding that the complainant falsely accused another of harassment knowingly or in a malicious manner, the complainant will be subject to appropriate disciplinary action up to and including termination of the employment relationship.

If you should have any questions about this policy, or the procedure for filing complaints, please contact any member of management or the Human Resources Office.

Retaliation is Prohibited

The Company will not tolerate retaliation against any employee for raising, in good faith, a complaint or concern about discrimination or harassment; for opposing conduct or practice such employee believes is good faith to be harassment or discrimination; for assisting another employee report harassment or discrimination; or filing a good faith complaint of discrimination or harassment with a government agency or contact.

Any employee who believes he/she has been subjected to retaliation or observes conduct, he/she in good faith, believes to be retaliatory should report the situation to the VP of Human Resources or relevant Human Resources Manager. Retaliation will result in discipline, up to and including termination.

VIII. Employment Programs

VFCR has instituted programs to achieve specific diversity action goals. These programs include:



- Training programs to enhance the knowledge and understanding of the value of a diverse workforce and a company culture of equality;
- Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
- Making job descriptions available to recruiting sources and all members of management involved in the recruiting, screening, selection and promotion processes;
- Evaluating the total selection process to ensure freedom of bias through:
 - Reviewing employment-related documents to include job applications, pre-employment inquiries to ensure information requested is job related;
 - Evaluating recruiting and selection methods to assure they target minority broad range of prospective applicants; and
 - Training management staff on proper interview techniques.
- Using techniques to improve recruitment and increase the flow of minority and female applicants, VFCA presently undertakes the following actions:
 - Include the phrase “Equal Opportunity Employer” in printed employment advertisements;
 - Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
 - Encourage all employees to refer qualified applicants and reward successful placements;
 - Actively recruit at community organizations, educational institutes which attract minority or female individuals; and



- Request community employment agencies to refer qualified minorities and women.
- Ensure that all employees are given equal opportunity for promotion. This is achieved by:
 - Posting promotion and employment opportunities internally; and
 - Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance opportunities for career growth.
- Monitor and evaluate diversity by department to gauge progress toward goals.

IX. Business Opportunities

Participation in the numerous business opportunities arising from VFCR operations should be available to a broad spectrum of potential business partners, to include minority-, women-, a disabled-owned business (MBE/WBE/DBE) and most particularly, those certified as such by the Commonwealth of Pennsylvania. Efforts to achieve and maintain such procurement and contracting participation shall include the following:

Governance

The Vice President of Finance with support from the Manager of Purchasing is responsible for the development and implementation of the Diversity in Contracting Program including:

- Awareness



- Ensuring awareness of the Diversity Plan goals through internal and external advertising and notices, as detailed below; and
- Advertising in media targeted towards MBE/WBE/DBE.

- Solicitation
 - Including notice of the Diversity Plan objectives in all contracts and request for proposals;
 - Coordinating solicitation efforts with appropriate governmental agencies assisting MBE/WBE/DBE;
 - Promote nondiscriminatory practices relating to vendor/contractor selection and promotions; and
 - Monitor and evaluate diversity by business partnership to gauge progress toward goals.

- Outreach
 - Attending/hosting vendor fairs to meet potential vendors and contractors and educate them on business needs and processes;
 - Promote awareness of business opportunities to various businesses and community groups, including minority MBE/WBE/DBE-oriented business organizations; and
 - Promoting and assessing contractors' diversity efforts.

X. Communication

Awareness of the Diversity Plan and the Company's efforts related thereto is a crucial component to the effectiveness of such efforts. Management, staff, associates, vendors, contractors and the general public all benefit from being informed of the Diversity Plan



objectives and procedures. Dissemination of information regarding the Diversity Plan shall include the following:

- Internal Communications
 - Inclusion of our Equal Employment Opportunity and Reasonable Accommodation statement in the Employee Handbook;
 - Inclusion of our zero-tolerance policies for harassment, discrimination, bullying and other actions which oppose our goal for a diverse workforce;
 - Postings in suitable areas for employee communication;
 - Diversity training programs for all employees; and
 - Quarterly progress evaluation meetings with appropriate personnel.

- External Communications
 - Advertising in employment and business sections of appropriate types of media;
 - Participating in employment and business notification programs of the PA Gaming Control Board; and
 - Distribution of literature to organizations actively supportive of minorities, women and disabled persons and MBE/WBE/DBE.

XI. Internal Audit and Reporting System

The Vice President of Human Resources in partnership with the Vice President of Finance (contracting and procurement) are responsible for the effective



implementation of the Diversity Plan; however, responsibility is likewise vested with each member of management.

The VFCC Partners audit and reporting system is designed to:

- Measure the effectiveness of the Diversity Plan;
- Document human resources activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which VFCC's goals and objectives have been obtained.

The following documents are maintained as a component of the VFCC's internal audit process:

- An applicant information report showing relative information for qualified candidates;
- Summary data of external job offers, hires, promotions, resignations, termination and layoffs/reductions;
- Completion of EEO-1 reporting;
- Utilization and recording of Voluntary Self-Identification Forms;
- Evaluation of employee relations incidents to include terminations and grievances;
- Maintain statistics on vendor/contractor business volumes with MBE/WBE/DBE and changes over time;
- Maintain statistics on contacts with outside organization in furtherance of diversity outreach efforts;
- Present periodic reports of quantifiable statistics to the Diversity Committee and to the management team;
- File annual reports on Diversity Plan compliance with the PA Gaming Control Board and other appropriate regulatory agencies.