



Lady Luck Nemacolin

Diversity Plan

Updated 2014

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DIVERSITY PLAN - 2014

1. Introduction

Lady Luck Nemaocolin and Isle of Capri Casinos, Inc. support diversity and inclusion as core business strategies to achieve success. It is our intent to subscribe to a proactive and comprehensive plan that establishes and maintains a diverse staff. Lady Luck Nemaocolin's management believes that increased diversity will afford us a richer set of perspectives and approaches to our business. We are committed to a policy that embraces diversity and targets achieving the following goals:

- Hiring, retaining and continuously developing talent at all levels of the company that mirrors the Southwestern Pennsylvania region in regards to ethnic and cultural diversity.
- Supporting the local economy through purchasing goods and services from a diversified group of vendors, contractors and professional service providers and minority and women owned businesses, when compared to the Southwestern Pennsylvania area.

We are committed to developing a marketing strategy with programs that target all ethnicities as potential patrons. We will be an equal opportunity employer and promote diversity where employment practices are concerned. At the Lady Luck Nemaocolin Casino, the Director of Human Resources shares responsibility with Isle of Capri Corporate Human Resource team to ensure execution of this diversity plan, creating reports to benchmark progress, administering policies and deploying new diversity initiatives as part of continuous improvement.

We will ensure equal employment opportunity for all persons, regardless of race, color, religion, gender, age, sexual orientation, national origin and citizenship status, veteran's status, non-job related disability, or other bias prohibited by applicable law. This diversity plan also applies to contractors, subcontractors, assignees, lessees, agents, vendors and suppliers. Commitment to this diversity plan is shared by all members of the executive team of Lady Luck Nemaocolin and includes the following actions:

- Proactively addressing any issues of diversity with our employees, vendors, patrons and the community by being grounded in accountability and ownership. We believe our employees and business partners share in the responsibility of upholding our standards and we offer a confidential reporting option available 24 hours a day, 7 days a week on our company website or for our employees by calling 1-888-ISLEACT (475-3228);
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- Engaging in frequent communications with our employees, patrons, and the community in regards to our commitment to diversity and other notes of celebration and interest via our Isle of Capri company (quarterly) newsletter;
- Making best efforts to actively solicit a diverse group of employees, contractors, subcontractors, assignees, lessees, agents, vendors and suppliers;
- Ensuring that strategic initiatives are developed and executed surrounding diversity in our entire operation This will be accomplished and owned by our Diversity Committee; and
- Embracing and supporting diversity in the entirety of the organization by periodically garnering key insights and recommendations by the Diversity Officer of the PGCB.

2. Diversity Statements

Lady Luck Nemacolin is an equal employment opportunity employer. We are committed to the belief that diversity in our workforce is essential to our current and future success.

The Company has an equally strong policy and commitment to minority and women-owned business development, through the use of minority and women vendors, suppliers, service trades, and construction contractors. The Lady Luck Nemacolin Diversity Plan is comprised of the following:

- A Diversity Committee;
 - Ongoing Community Involvement;
 - Recruitment and Employment Initiatives;
 - Solicitation and engagement of MBE/WBE Vendors/ Contractors/ Suppliers;
 - Marketing Promotions and Programs;
 - Training Programs;
 - Complaint Procedures;
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- Ownership Commitment;
- Periodic Review of Policies and Programs; and
- Ongoing and Continuous Improvement Strategies.

3. Diversity Committee

A diversity committee will be established when the property becomes operational. It will encompass various operational departments to capture a variety of employee segments. The committee will discuss current policy, program and statistics, as well as continual improvement initiatives, including:

- Changes in the workforce needed to help meet business priorities;
- Changes in the work environment that ensure a robust understanding and awareness of our commitment to diversity at all levels of the organization; and
- A planned internal and external communications agenda to inform, engage and manage expectations of diverse groups of stakeholders.

The committee will also determine regional organizations/companies that can assist with these various diversity efforts. All areas of the diversity program will be reviewed and discussed on a quarterly basis and the committee will provide meeting notes and make recommendations to upper management. The Internal Audit department will also conduct audits of the efforts and progress of the committee.

4. Community Involvement

Lady Luck Nemaocolin will ensure that diversity is respected and encouraged throughout the organization and will be active participants in the community through our company's, Community Aces programs and will engage in other outreach efforts. Lady Luck Nemaocolin will establish and foster relationships with various local educational institutions, local and diversity targeted career websites, the Fayette, Morgantown, Farmington and other local Chambers of Commerce, and other organizations to assist with our diversity efforts.

Lady Luck Nemaocolin will also make donations when possible to local civic and charitable causes. An attempt will be made to ensure that a portion of these donations are dedicated to supporting minority and women based organizations.

5. Recruitment & Employment

We are committed to recruiting, retaining and developing the best employees regardless of race, color, religion, sex, age, disability, national origin, sexual orientation or veteran status. Lady Luck Nemacolin will comply with the Equal Employment Opportunity Act and will adhere to policies consistent with the Act that apply to all employment practices including recruitment, hiring, evaluation, promotion, transfer, discipline and termination, as well as forms of employee compensation. The Director of Human Resources will be designated as the property's Equal Employment Opportunity Coordinator.

Recruiting tools that are utilized to help ensure a diverse workforce include promoting from within, employee referrals, advertising in targeted and local newspapers and other printed publications, posting open job positions on the company website and working with local organizations, placement services, city and state occupational skill centers and chambers of commerce to attract a diverse group of applicants.

Recruitment

- We will utilize trade schools, vocational centers and employment agencies that specialize in training and assistance to minorities, females, and disabled and economically disadvantaged persons to help attain our diversity goals.
 - Publications will be utilized that reach out to the local community regarding job opportunities.
 - We will utilize civic groups and community organizations that are representative of diverse constituencies to assist in communicating employment opportunities in the local community.
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- When utilizing websites for recruitment for Lady Luck Nemacolin, we will target diversity and when necessary, subscribe to websites such as:
 - diversityjobsusa.com;
 - diversityclassifieds.com;
 - casinocareers.com;
 - careerbuilder.com; and
 - diversity.jobs.careercast.com.
 - We will partner with local organizations that train and secure employment for individuals with disabilities.

- Lady Luck Nemaocolin will participate in programs developed by civic organizations, minority groups, women's organizations, minority groups, community agencies, community leaders, and local schools and colleges.

Employment

- Job descriptions will be carefully written to not include restrictive and unnecessary minimum requirements that might restrict our ability to employ ethnic minorities and the disabled.
 - We will provide a workforce that represents the diversity that exists in the general population of the Southwestern Pennsylvania communities.
 - We will continuously implement strategies to increase the diversity within our staff. We will accomplish this by making training and educational development opportunities available to our current employees, so that high-performing employees who are either women or ethnic minorities can qualify to be candidates with the intent of assuming positions of increasing responsibility, including management.
 - We will complete and provide a Workforce, Job Group, Availability and Utilization Analysis that details the diversity in our employment.
 - We will schedule annual talent reviews and other succession planning initiatives for management level to ensure that everyone has the opportunity to develop, grow and advance their careers.
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- We will keep the lines of communication open with employees through email, meetings, board postings, periodic employee newsletters and an electronic media service notification system.

6. Dissemination of Diversity Policy

Lady Luck Nemaocolin ensures that all are aware of their stance where it concerns being an Equal Employment Opportunity employer (EEO) and diversity through various mechanisms, including internal distribution methods.

The diversity plan will be discussed as a part of our new hire orientation process. The topic of diversity is also covered in our employee handbook and is explained as a part of the new hire process as well.

The Director of Human Resources will review the diversity plan annually and update as is needed. Also, communications will take place with the department managers and supervisors if there is a case of underutilization, with the formulation and deployment of a comprehensive correction strategy.

When we have employees highlighted in our Company newsletter, via social media or any other venue, we will make best efforts to include women, minorities and individuals with disabilities.

7. Construction

The development of programs for inclusion of minority businesses and other diverse groups in the construction process for Lady Luck Nemaquin ("Lady Luck") is an important initiative for both the local minority community and Lady Luck.

Lady Luck strongly believes a proactive approach towards minority participation during construction in the long term develops into beneficial relationships, which can extend to future construction projects.

Good Faith Plan for Minority Construction Participation

- IOC-PA, L.L.C selected Keating Building Company ("Contractor") to construct Lady Luck Nemaquin. Keating's long history of successful casino projects in Pennsylvania and knowledge of the Good Faith requirements for Minority Participation; coupled with a knowledgeable staff to encourage MBE and WBE participation made them the ideal contractor to construct Lady Luck.
- Reaching out to minority and diverse companies and organizations in the areas surrounding Lady Luck is a priority. Due to Lady Luck's location it is important that minority contractors in Pittsburgh area are made aware of the opportunity to participate in the Lady Luck project.
- Lady Luck's diversity consultant will work with the Contractor in reaching out to minority organizations identified as leaders in Southwestern Pennsylvania to solicit their input to increase minority participation.
- Lady Luck its Contractor and diversity consultant through the duration of the project will:
 - Continue solicitation of minority and other diverse contractors and vendors;

- Identify qualified minority and diverse contractors and suppliers;
- Develop ongoing positive relationships with the minority community; and
- Implement a reporting process designed to ensure, minority and diverse contractors and suppliers are being properly documented and reported.

Lady Luck's goal is to staff the construction project with MBE, WBE and diverse contractors in a number, which is reasonably reflective of the local community.

8. Vendors and Suppliers

Lady Luck Nemacolin will promote the procurement of goods and services from a number of qualified companies that are owned by women and ethnic minorities.

Lady Luck Nemacolin will utilize the Pennsylvania Gaming Control Board's list of minority and women's businesses to ensure awareness of potential vendor partnerships, as well as make efforts to:

- Network with ethnic chamber of commerce and civic organizations to help recruit qualified vendors;
- Utilize niche media to help attract qualified vendors; and
- Utilize public information that lists businesses owned by women and ethnic minorities.

9. Marketing and Entertainment

Lady Luck Nemacolin will include strategies that market to ethnic minorities and niche groups to patronize the casino complex. Such efforts will include:

- Radio advertising;
 - Advertising in targeted ethnic publications; and
 - Ethnic entertainment events, promotions and other forms of special events.
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10. Diversity Awareness Training Program

The objective of the diversity awareness training program is to employ a staff that is cognizant of the needs of its fellow employees and the diverse customer base that patronizes Lady Luck Nemaocolin. Our training efforts will be designed to ensure that all employees are aware of diversity issues, and have an understanding of ethnic changes in the workplace. In order to provide the very best customer service, it is necessary for our employees to understand the importance of appreciating peoples' differences, so that stereotypes and prejudices may be overcome.

We will have a zero tolerance policy towards discrimination of women, ethnic minorities and persons with disabilities. Also, any complaint of discrimination will be investigated to the fullest extent by the property's Director of Human Resources. All employees will be required to complete the diversity awareness training program during employee orientation. The Human Resources Department will continue to setup diversity and harassment training annually.

11. Diversity Training for Managers

In addition to the orientation diversity training, Department heads, managers and supervisors will be required to attend diversity management training conducted by the Director of Human Resources, with involvement by the General Manager and other property executive team leaders.

Topics presented in the class will be the diversity mission statement, the definition of diversity, the importance of diversity, cultural and racial sensitivity, stereotypes and personal awareness activities. These classes will provide our teams with the tools on how to promote diversity throughout their respective departments. Lady Luck Nemaocolin will focus on meeting with all levels of property management, as well as Isle of Capri corporate leadership to expose all facets of the Lady Luck Nemaocolin Diversity plan and how they can utilize it on a day to day basis.

12. Ownership Commitment

The Lady Luck Nemaocolin diversity plan will only prosper with senior management commitment to diversity throughout the company. Therefore, the executive leadership of Lady Luck Nemaocolin will be committed to ensuring the success of diversity within the company.

13. Periodic Performance & Program Review

The Diversity Committee will conduct quarterly review meetings to ensure compliance with all aspects of Lady Luck Nemacolin diversity program. The review will assess the overall effectiveness of the program, centered on the diversity of employees, contractors, vendors and suppliers. The diversity initiatives for the next period will be presented by the Lady Luck Nemacolin management. In addition, to comply with The Pennsylvania Gaming Control Board's Regulation 481.5. (Reports of Participation), annually, Lady Luck Nemacolin will file a report with the Board concerning the performance of our diversity plan. Lady Luck Nemacolin will maintain records and databases of the following information:

- Employment data, including information on minority and women representation in the workforce in all job classifications; salary information; 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 or transactions awarded for goods and services;
 - The total number and value of all contracts or transactions awarded to minority and women's business enterprises;
 - The total number and value of all contracts awarded that contain a participation plan;
 - The total number and value of all subcontracts to be awarded to minority and women's business enterprises under contracts containing participation plan;
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- An identification of each subcontract actually awarded to a minority or women's business enterprise under contracts containing a participation plan during each calendar quarter and the actual value of each such subcontract;
 - An identification of each contract or transaction awarded to a minority or women's business enterprise;
 - A comprehensive description of all efforts made by the licensed entity or applicant to monitor and enforce the participation plan;
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- Information on minority and women investment, equity ownership, and other ownership or management opportunities initiated or promoted by Lady Luck Nemaocolin; and
- Other information deemed necessary by the Board to ensure compliance with the act and the diversity requirements 481.1 - 481.5.

14. Diversity Online

Lady Luck Nemaocolin understands that continuing success in diversifying the employee, vendor and supplier base is contingent upon the company's ability to identify greater numbers of quality and diverse people and companies. Lady Luck Nemaocolin maintains a website www.islecorp.com that will allow potential employees, as well as minority and women-owned business to obtain information on employment and vendor opportunities with Lady Luck Nemaocolin.

15. Continuous Improvement & Industry Best Practices

Lady Luck Nemaocolin intends to continually look for ways to improve existing operations and to ensure that industry best practices are utilized whenever possible.
