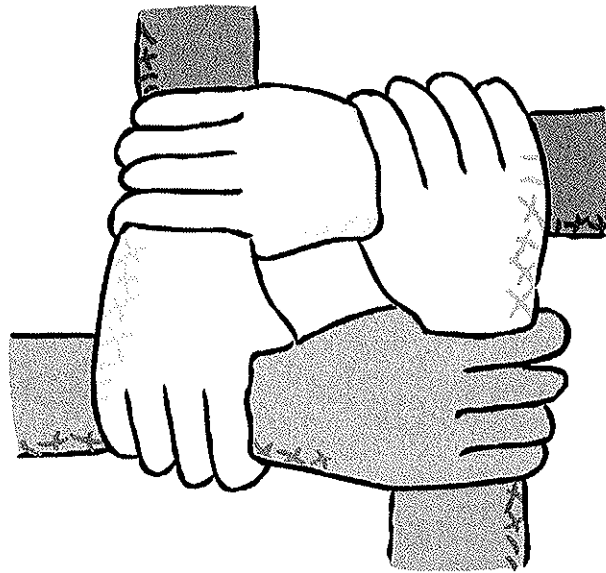




IOC - PA

DIVERSITY PLAN FOR Lady Luck Nemaclin



Updated October 7, 2010



IOC - PA

DIVERSITY PLAN

TABLE OF CONTENTS	PAGE
Policy	3
Executive Summary	4
Definitions	6
Charitable Contributions/Community Affairs	7
Construction	8
Employment	9
Sexual Harassment/Discrimination	11
Ongoing Procurement	14
Workplace Inclusion & Commitment	16



IOC - PA

POLICY

The Isle of Capri Casinos, Inc. and all subsidiaries, including IOC-Pa, is an equal employment opportunity employer. We are committed to the belief that diversity in our work force 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 plan for Lady Luck Nemacolin is designed not only to provide equal opportunity for vendors, suppliers and employees, but to proactively seek out individuals and businesses from traditionally disadvantaged groups for casino jobs and construction/supplier contracts. We are committed to the belief that diversity in our work force is essential to our current and future success. The inclusive diversity philosophy that already exists at Nemacolin Woodlands is intended to be more far reaching than simply to the inclusion of minorities and women.

The Lady Luck Nemacolin policy as outlined in this document will also incorporate all of the protections and actions outlined in the Americans with Disabilities Act (ADA), which was signed into law in July 1990. The Law is divided into four major titles that prohibit discrimination against disabled individuals in employment. Employers may not discriminate against a person with a disability in hiring or promotion if the person is otherwise qualified for the job. Employers must provide "reasonable accommodation" to persons with disabilities, including such steps as job restructuring and modification of equipment and workstations.



EXECUTIVE SUMMARY

Purpose

This plan outlines specific procedures aimed at ensuring equal opportunity and diversity in employment, contracting, operations, and in community relations activities for Lady Luck Nemacolin. The plan will establish and develop a commitment to ensuring the growth and development of minority and female-owned businesses. The diversity plan is intended to facilitate equal employment opportunities throughout its workforce and ensure equal opportunities in its purchasing and contracting efforts.

Committee

Lady Luck Nemacolin will implement a Diversity Committee that will oversee the diversity vision and be responsible for advancing diversity. The committee will consist of four members: General Manager, Director of Human Resources, Purchasing, and Construction.

Strategy

The strategy is to enable Lady Luck Nemacolin to provide, develop, and implement the plan to drive achievement of ensuring equal opportunity and promoting diversity in the focus areas:

- Charitable/Community
 - Support community organizations affiliated with minority and disadvantaged groups and promote participation from all employees.
- Construction
 - Provide MBE/WBE opportunities in every aspect of construction and bidding and to actively recruit interest in the project from the MBE/WBE construction community.
 - Establish relationships within the community to raise awareness and identify qualified MBE/WBE contractors and suppliers.
- Employment
 - Promote and encourage a sense of responsibility within our management team for equal opportunity in employment, training, compensation, promotion, transfers, terminations, hiring, and layoffs.
 - Distribute information on all appropriate job openings to area agencies, which can assist with dissemination of the information to minority and female potential applicants.



IOC - PA

- Procurement
 - Support minority and women owned businesses within the community wherever possible
 - Encourage MBE/WBE participation in vendor and supplier procurement practices.



DEFINITIONS

Diversity encompasses the concept of acceptance and respect. It means understanding that each individual is unique, and recognizing our individual differences. These can be along the dimensions of race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies. It is the exploration of these differences in a safe, positive, and nurturing environment. It is about understanding each other and moving beyond simple tolerance to embracing and celebrating the rich dimensions of diversity contained within each individual.

Definition of Minority

An individual who is a member of the following ethnic groups: African American, Hispanic, Asia, Native American and females regardless of race or ethnicity for the purposes of MBE's and WBE's.

Definition of Participation Plan

The participation plan outlines our expectations of our contractors to make all reasonable efforts to provide opportunities for inclusion and utilization of MBE/WBE, with such expectations being made part of these contracts and enforced by the Company.

Definition of Minority Business Enterprise (MBE) and Woman Business Enterprise (WBE)

Minority and female enterprises that meet the guidelines set by the Pennsylvania Department of General Services Bureau of Minority and Woman Business Opportunity or other similar organization.



IOC - PA

CHARITABLE CONTRIBUTIONS/COMMUNITY AFFAIRS

Embracing Community Spirit

At Isle of Capri Casinos Inc, we encourage and promote all of our operating subsidiaries to be good Corporate Citizens and involved in their respective communities. This means, that in addition to donating funds and support services to community groups, we also encourage our employees to be actively involved in charitable causes in the communities in which we operate.

Our company founder, the late Bernard Goldstein, felt so strongly about community spirit that we recently launched Community Aces, our charitable giving and volunteer program, honoring his legacy.

Since our company was founded, we have donated millions of dollars and in-kind contributions to charities, nonprofit organizations, education institutions, civic groups and assistance programs.

We have set records in fundraising for the United Way. Our employees have donated countless hours of time and money to such groups as: the American Cancer Society, Special Olympics, Habitat for Humanity, Gilda's Club and Ronald McDonald House Charities. From bowl-a-thons to bike rides and food drives, our charitable giving has had a positive impact in each of the communities we serve.

In addition, our Sunshine Fund, a company-wide emergency support program administered by the Greater Saint Louis Community Foundation, continually raises funds to provide financial assistance to help employees who are impacted by a disaster or unexpected financial hardship.



IOC - PA

CONSTRUCTION

Construction Diversity

The company's objective is to include MBE/WBE in its construction projects to the extent practical and with efforts to recruit and develop relationships with such companies that promote a diverse workforce. We will promote inclusion to reflect the region's diversity and establish policies to achieve those goals.

Using minority businesses, women owned businesses, and other diverse groups on bids for the Lady Luck Nemacolin construction project will be a stated goal in our contracts for construction services this policy will also continue for future renovation projects.

Minority Construction Participation

The company will implement the following steps to include MBE/WBE contractors and suppliers for construction projects at Lady Luck Nemacolin.

- The selection of third party and in-house construction managers will require individuals and companies to share our commitment to minority participation and to evidence past practice that supports such policies.
- Require the construction manager to provide minority contractors and suppliers bidding opportunities and implement a tracking system that allows for review of such efforts. This tracking system will be reviewed periodically by the team at IOC responsible for the construction.
- To identify capable minority contractors and suppliers we will work with the Commonwealth of Pennsylvania, the PA Gaming Control Board, other resources, and databases identified that contribute to our knowledge of the MBW/WBE community in our area.
- Maintain an ongoing relationship with the corporate purchasing department at our headquarters to utilize any special expertise or understanding that will encourage greater participation.
- Promote specific policies and procedures that require the construction team to demonstrate efforts in identifying and recruiting minority contractors and suppliers before work is awarded.



EMPLOYMENT

Workforce Diversity

Both the parent company IOC Casinos Inc and Lady Luck Nemaquin are equal employment opportunity employers committed to the belief that diversity in its work force is essential to its current and future success. Everyone brings something different and of value to the table. The Company is committed to equal employment opportunity for all persons without regard to race, creed, color, religion, gender, age, sexual preference, disability, national origin, veteran or military status, marital status, membership or activity in any local commission, citizenship status, status with regard to public assistance or any other protected classification under applicable federal, state or local law. The policy applies, but is not limited to, recruitment, advertising, hiring, job assignment, promotion, compensation, benefits, training, transfer, layoff, return from layoff, reclassification, termination, demotion, and Company sponsored education, social and recreational program.

Recruitment and Selection

Advertising for open positions will include diverse media sources, which will include print, radio, television, and the internet. We will distribute information on all appropriate job openings to area agencies that can assist with dissemination of the information to minority groups.

The company will give fair and equal consideration to applicants in all qualifying interviews and test. Minorities and females applicants shall not be required to possess qualifications for any position more exacting than those required of incumbents unless the nature of the position has changed for good business reasons.

We will engage statewide advocacy organizations for our recruitment efforts. Include in all internal and external employment advertising the statement, "Equal Opportunity Employer" and exclude any reference to race, color, creed, disability, religion, sex, age, or national origin.

Employment Objective

Lady Luck Nemaquin will strive to maintain a diversified workforce.

Training, Development, & Retention Efforts

The training and retention efforts will help develop a diverse workforce. Lady Luck Nemaquin will provide best practice training to be consistent with our EEO recruiting



IOC - PA

and hiring practices. Diversity training will be conducted for all employees in the workplace, provide culturally sensitive training to management, and implement diversity in the orientation program. The company will implement a mentoring program that will help build the confidence of new employees handling job duties that will increase the chances of retaining new employees. Conduct, review, and assessments of training and educational needs of all employees to increase and upgrade their skill levels to enhance their employability. Employees are loyal to organizations that invest in their careers.

Compensation and Benefits

All compensation and benefits programs and practice will be applied to employees in relationship to their jobs classification or grade without any concerns for race, creed, color, age, gender, affectional preference, disability, veterans status, marital status, disability related to pregnancy or childbirth, citizenship status, membership or activity in local commissions, status with regard to public assistance or national origin.



SEX DISCRIMINATION

Isle of Capri Casino complies with the sex discrimination guidelines as set forth by law:

- Employees of both sexes are recruited for all jobs unless sex is a bona fide occupational qualification.
- The Company's employment advertising in newspapers and other media does not declare a gender preference and does not appear in sex segregated printed columns.
- The Company's policy manual and employment application forms expressly state that there will be no discrimination against employees on account of gender.
- The Company does not make any distinction based upon sex in employment opportunities, wage, hours, or other conditions of employment, and offers employees of both sexes an equal employment opportunity for any jobs they are qualified to perform.
- The Company's contributions for insurance pensions, welfare programs and other similar "fringe benefits" are the same for men and women.
- The Company does not make any discriminatory separation between married and unmarried persons of either sex.

The Company does not deny employment to women or men with young children, and does not penalize employees, male or female, who require time away from work for childbearing. The leave policy includes provisions for maternity leave to be treated as a short-term disability, and provides for reasonable period of time away from work on account of childbearing. Seniority, position, and other benefits are retained when the employee returns to work. Disabilities caused by or contributed to by pregnancy, childbearing or related medical conditions are treated the same as disabilities caused by or contributed to by other medical conditions under our organization's insurance plan.

- The Company provides appropriate physical facilities to both sexes and does not refuse to hire men or women or deny men or women a particular job because there are no restrooms or associated facilities.
- The Company does not rely upon a state "protective" law to deny women employees the right to any job they are qualified to perform nor does the company restrict one sex to certain job groups.
-



IOC - PA

- The Company does not on the basis of sex specify any differences between men and women employees in either mandatory or optional retirement age.
- The Company's wage schedules are not related to or based upon gender, nor are seniority practices where applicable.
- The Company has incorporated the Family Medical Leave Act in the operating procedures and notices are posted.
- The Company will continue to take the following affirmative actions:
 - Encourage females to apply for all positions within the Company for which they are qualified.
 - Include women in all training programs offered by the Company
 - Encourage women to apply for all training programs that can facilitate their promotability.

It is our firm commitment to ensure that equal employment opportunity will be provided through Isle of Capri Casino to all employees and prospective employees.

Religious Discrimination

Isle of Capri Casino maintains a policy to ensure equal employment opportunity to all employees without regard to religion or national origin. The Company will continue to review its employment practices to ensure that members of the various religions and/or ethnic groups are receiving fair consideration for job opportunities. It is also our policy to accommodate the religious observances and practices of our employees when such accommodation does not require an undue hardship on the conduct of our business. To determine what comprises undue hardship, business necessity, financial costs and expenses as compared to the size of our facility, and corollary personnel problems are the factors considered.

Isle of Capri Casino affirms through the review of its policies and procedures, various religious and ethnic groups receive fair consideration for all job opportunities and, should a deficiency be identified, appropriate outreach and recruitment activities will be undertaken for rectification.

Isle of Capri Casino reviews its employment policies, procedures, and practices for possible discrimination against members of various religious and/or national origin groups. The Company's employment policies and practices do not contain any provisions that could result in unfair consideration of members of various religious or national origin groups for employment opportunities. The commitment to equal



IOC - PA

opportunity in all aspects of employment without regard to religious or national origin is part of the Company's Affirmative Action Policy Plan Statement and Program.

It is understood that Isle of Capri Casino, as an employer, has an obligation to accommodate religious beliefs with regard to availability of an employee for work on weekends or holidays, and in some cases with respect to dress. Accommodation will be made unless the supervisor of the employee and/or Human Resources can demonstrate that such an accommodation would cause undue hardship for the Company.



ONGOING PROCUREMENT

Purchasing Diversity

Lady Luck Nemaocolin will encourage meaningful participations of MBE/WBE sources wherever possible to provide useful and acceptable quality products or services at competitive prices. The primary focus is to ensure that all qualified vendors are given equal opportunity to bid on products and services to be utilized at Lady Luck Nemaocolin.

Plan for Minority Vendor Participation

For the purpose of definition and classifying a business as a MBE/WBE we will follow the Federal and National Minority Supplier Development Council Guidelines. Lady Luck Nemaocolin will consider quality, service, dependability and price as the main components of any vendor relationship.

The purchasing department will utilize both Commonwealth and national organizations to identify potential sources to develop national corporate programs.

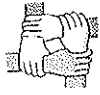
A link will be developed on the company's website under the option titles Vendor Relations. This link will offer a potential vendor the option of purchasing contracts, vendor forms, and MBE/WBE Link. The MBE/WBE choice will take the inquiry to a page providing a public statement of our policy, and the option to complete an online inquiry and contract application.

We will establish reasonable payment plans and/or options, agreed upon by both the vendor and the Purchasing Manager after reviewing the financial status of the diverse vendor.

The inclusion of MBE/WBE will remain an on-going priority and we will encourage existing minority and other diverse vendors to continue to provide quality service and establish long term positive relationships with company.

Attend and support minority business fairs organized by minority groups in the Commonwealth. Review the MBE/WBE list of approval periodically for any changes.

Consideration will be given to minority and female-owned companies when bids are equal or within 5% of low bid. The final decision on this variance is that



IOC - PA

of the General Manager, keeping in mind the Company commitment and goals for minority and female-owned business development.

Vendor Form

Lady Luck Nemaquin will endeavor to have all vendors complete a vendor registration form prior to any contract or purchase order will be issued, which will include information on MBE/WBE status.



IOC - PA

WORKPLACE INCLUSION & COMMITMENT

Inclusion starts at the top and Isle has already made that a priority with the hire of the current “Gaming Executive of the Year” with Virginia McDowell. She is a leading voice in the gaming industry and is also a member of the diversity initiatives of the American Gaming Association. At the property level we have already begun the process of identifying potential candidates for the general manager position and several of the potential candidates for this position are either African American or females.

This diverse team of leaders will guide us in making diversity an integral part of how we operate at Lady Luck Nemaquin. Such focus will be reflected in seeking input and in every representation of our workforce including employee publications and back-of-house communications. Our unique “Hiring Toolkit” aids us in focusing on the variety of skills that different individuals bring to us and aids us in placing them where those skills can best be used.

By our leadership choices, our communications and the day-to-day process of selecting and placement of workers we will make the greatest use of the talents and skills of a diverse workforce. Our commitment has already been demonstrated by our actions and it will continue at Lady Luck Nemaquin