

**DIVERSITY POLICY**

**Accompanying letter from President**

When people think of Diversity in corporate terms it is generally "workforce diversity" i.e. a workforce in which individuals differ from one another. While the acknowledgement and appreciation of employees' differences is an important component of our Diversity Policy it is only one of three areas that we focus on. Just as important is to ensure equality of opportunity for all vendors, suppliers, contractors and trades people. Thirdly, through targeted marketing and comprehensive employee awareness training, we will create an open and welcoming atmosphere at our facility where guests of many diverse backgrounds feel comfortable.

The United States of the 21<sup>st</sup> Century is undergoing considerable demographic changes. For example, the ethnic make up has changed whereby the Hispanic population has now surpassed all others as the largest minority group. Women now make up nearly 50% of the workforce (an increase of 23% since 1970). Labor force participation rates for men over 65 are expected to increase as the older population consists of healthier individuals.

We will always try to align our Diversity Policy with what is happening in the real world. The increased diversity of the 21<sup>st</sup> Century's population and workforce means that we will focus on diversity of culture, age, gender, skills, religion and sexual orientation as well as traditional racial diversity.

Incorporating diversity into the world of Greenwood Gaming & Entertainment, Inc. is a challenge but one which we welcome and feel qualified to succeed.

With Best Wishes,

Yours Truly,

R. W. Green  
President

**GREENWOOD GAMING & ENTERTAINMENT, INC.**

**DIVERSITY POLICY**

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## **DIVERSITY POLICY**

### **Introduction by Company President**

Greenwood Gaming & Entertainment, Inc. is committed to a Diversity Policy that provides equal employment and business opportunity to all segments of the community, maintains a discrimination free workplace and creates a welcoming atmosphere to all customers.

It is our policy to ensure that employees are recruited, hired, trained and promoted throughout the organization without regard to race, creed, color, national origin, ancestry, age, marital status, sexual orientation, genetic information, mental or physical disability, sex, medical condition or because of an individual's commitment to the military.

This statement also applies to all vendors, suppliers, contractors, sub-contractors, assignees, lessees and agents. Our purchasing and contracting decisions will be made in a completely non-discriminatory manner.

Greenwood Gaming & Entertainment, Inc.'s Diversity Director has overall responsibility for monitoring this plan. Anyone who believes they may have been discriminated against in violation of these principles or who needs a reasonable accommodation should contact the Diversity Director.

Sincerely,

R. W. Green  
President

## Statement of Goals

- To establish a diverse workforce by ensuring consistency and fairness in the recruitment, selection and career development process.
- The promotion of diversity by ensuring equality of opportunity in the procurement of contractors, sub-contractors, assignees, lessees, agents, vendors and suppliers.
- The creation of an open and welcome atmosphere at all of our properties where employees, guests and work related visitors (e.g. contractors, suppliers etc.) feel comfortable and welcome.
- To actively seek out minority and women owned business enterprises and to provide opportunities for them to bid on providing services and or supplies.

## Diversity In The Workplace

Greenwood Gaming & Entertainment, Inc. seeks to increase awareness of diversity issues by its Senior executives and then to encourage and support them as they promote them in their areas of responsibility.

We will encourage them to examine the racial, ethnic, cultural, gender and age changes in both the local community and the workforce, to understand the importance and appreciation of people's differences, examine stereotypes and prejudices and how they impact behavior and how to communicate more effectively with people from all walks of life.

The HR and Legal departments will provide appropriate support and assistance but Greenwood Gaming & Entertainment, Inc. looks to all of its Senior Executives to incorporate diversity into their areas of responsibility within our workforce. Absolute impartiality is required when **recruiting**, **selecting** and **orienting** new hires. The same is expected when considering candidates for **pay reviews**, **further training** and **promotions**.

### Recruitment

Greenwood Gaming & Entertainment, Inc. is an Equal Opportunity Employer (see Appendix A "Equal Opportunity Policy").

This policy underpins our commitment to recruit, retain and develop a workforce that reflects both its local community and customer base. It contributes to a well-rounded workplace where differences are respected and appreciated.

In addition to its traditional ways of seeking new candidates the Company will undertake the following:

- Recruitment Advertising in media that targets women, minorities and the disabled such as Minority Publications and Radio Stations. Recruitment Advertising in Spanish as well as English where appropriate.
- Develop close Relationships with Federal, State and Local agencies and minority hiring programs to increase opportunities for minority applicants.
- Regular monitoring by HR to ensure targets are met. Track applicant flow by inserting a survey in the application process asking applicant to voluntarily indicate race/ethnic origin.
- Cultivate historically black colleges and universities and make them aware of the many career opportunities available in gaming.
- Attend all Job Fairs in Southeastern Pennsylvania, with an emphasis on those that target minorities and women.

Selection and Orientation (see attached Appendix B; Employment Law and Appendix C, Lawful and Unlawful Pre-Employment Enquiries)

All Greenwood Gaming & Entertainment, Inc. employees who are responsible for recruitment and selection will be coached in lawful employment-making decisions. Appendices B and C give guidelines to recruiters.

Ensure all Employment literature is available in English and Spanish including

Application for Employment forms.

Any tests that may be used.

Post Hire Paperwork- Employee Handbooks  
401 (K) and other Employee Benefits Information  
Union literature  
Medical Health Information

Newsletters and Company Wide Communications.

Training

Ongoing training for Heads of Department and Company Training personnel on the differences in training methods needed to accommodate diverse learning styles. Ensure training syllabi takes into account our diverse workforce – paying careful attention to training literature, training videos and styles of teaching. Training and Development is not a “one size fits all” approach and this is even more pronounced in a multi-cultural workforce.

Employee Relations

\* Recognize and promote special dates, events and holidays such as:

Black History Month  
Chinese New Year  
Cinco de Mayo  
Casmir Pulaski Day  
St. Patrick's Day

Publicize such events in the Company newsletter, on message boards and the Company's web pages.

\* Coordinate the above with the Food & Beverage Department so that ethnic meals can be available where appropriate.

\* By department, where appropriate host employee events where they can bring food from their culture to share with others.

- \* Designate an area where employees can display artifacts or information about their cultures.
- \* Diversity quizzes with prizes in the Company newsletter.

#### Career Development

Regularly perform a survey of all pay increases/promotions to measure the success of the diversity initiative.

Track and review the pay increases/promotions within each department.

Encourage professional development by providing tuition reimbursement.

Hold Managers and Supervisors accountable for implementing the diversity plan in their respective departments.



## **Diversity and our Guests**

Our goal is to market and advertise our Company to create an inviting atmosphere at our properties where individuals from many diverse backgrounds feel comfortable.

Advertise in media targeted towards minorities and women (newspapers/periodicals). Revise advertising to feature multi-cultural clientele and themes.

Food & Beverage Initiatives.

Celebration of Holidays, Special Events

Research of the trends and expectations of consumers in emerging multi-cultural markets.

## Diversity in the Community

- Encourage strong and positive citizenship in the community.
- Employees should be encouraged to participate in local community organizations.
- Sponsor "How to Apply for a Job" workshops at local high schools in the area.
- Collaborate with community organizations to serve as mentors to any programs that support our diversity initiatives.

Target charitable Payroll Deductions so as to reflect our diverse employee population.

Our Company Philanthropic initiatives will continue and be regularly reviewed to ensure compatibility with our Diversity Policy. Contributions in 2004 include donations to:

Tsunami Relief Fund  
HERO Scholarship Fund  
Nancy Davis Foundation to Erase MS  
James Hughes Memorial Scholarship Fund  
Children's Diabetes Foundation  
Council on Compulsive Gaming  
Bravo Educational Fund  
Philadelphia Foundation Speakers Fund  
Cancer Recovery Foundation  
National Multiple Sclerosis Society  
Kiwanis Club  
Andre' Agassi Charitable Foundation  
Harvard University

## Diversity in Business Partnerships

It is our intention to create an environment where there is equality of opportunity in all of our business partnerships.

We will work closely with a diverse group of contractors, suppliers and other vendors including certified minority owned, women owned, disabled and small business enterprises, to provide the Company with goods and services. A database will be created of qualified and certified minority and women owned business and our agents will carry out site visits to such businesses.

We, in turn, will encourage our partners to support diversity efforts through second-tier supplier programs.

In addition, the Company will mentor disadvantaged businesses to help them develop.

Our Executives are committed to attending trade shows and trade fairs as a way of meeting new potential partners and a web site will be created allowing for potential vendors to be included in the vendor database and receive information about procurement of goods and services.

Key diversity activities under consideration for implementation include:

- Adoption of a formal policy that requires Company buyers include Minority-owned Business Enterprises (MBE), Women-owned Business Enterprises (WBE) and Disadvantaged-owned Business Enterprises (DBE) for all commodity purchases over \$1,000 where possible and if not possible to explain what attempts were made to include such businesses for consideration.
- Review and improve our supplier diversity website for MBE, WBE and DBE on-line registration.
- Active participation in trade shows, conferences or conventions throughout the country including the National Minority Supplier Development Council, NAACP and US Hispanic Chamber of Commerce.

## Diversity Committee

To ensure that our goals are implemented and complied with we will establish a Diversity Committee, which will be chaired by a Senior Executive and include representatives from all the appropriate departments. A Diversity Director will be recruited and will be a member of the committee. This committee will regularly assess the success of this diversity plan.

Its aims are as follows:

1. To address and monitor our three main diversity targets.
  - \*The workplace - Recruitment Selection Training  
Pay. Benefits. Upward Mobility.  
Work Environment
  - \*Guest Relations- Marketing. Advertising. Promotions.
  - \*Business Relationships- Local Community.  
Minority Businesses.
2. Provide the Board Directors and Senior Executive Committee with periodic reports of its findings, including identifying accomplishments as well as any failures, and a thorough audit.
3. Provide the Gaming Board with a report of it's diversity results during each license renewal period.
4. Recommend Diversity Programs and Projects.
5. Advise the Company's Management Team with respect to the foregoing.
6. To maintain documentation of the Committee's activities and progress and to update the Senior Executives regularly on that progress.

## **Diversity Director**

The Diversity Director will report to the CEO and be responsible for the implementation, monitoring and enforcement of the Diversity Policy. These responsibilities include without limitation, recruitment, equal employment opportunity awareness training, workforce statistical analysis, grievance counseling and fact finding; career advancement counseling; assessment and adaptation of all personnel and compensation policies and procedures for conformity with agreed policies approved by any Federal or State equal employment and business opportunity laws; monitoring and coordinating contracting purchasing and construction activities and developing and maintaining the involvement of the Company in the community in support of equal employment and business opportunity.

The Diversity Director will continually communicate with the Human Resources, Purchasing and Facilities/Construction departments to ensure the objectives of the Policy are being met. These departments will be required to submit copies of contracts awarded and contractor advertising for all levels of the workforce to demonstrate efforts made to comply. In addition, the Diversity Director will work closely with the VP of Human Resources to review its employment practices to determine that all policies and procedures apply equally to all employees and that all policies comply with our Diversity initiatives.

The Diversity Director will liaise closely with the AGA Diversity Task Force. The AGA is committed to promoting diversity in the commercial casino industry and fulfills this commitment through a number of initiatives that focus on diversity hiring and procurement. We hope that eventually the Diversity Director can become a member of this Task Force (which is divided into two sub-committees – Human Resources and Purchasing and Contracting). The Diversity Director will also coordinate Greenwood's assistance to the "Opportunity Expo" held annually as part of the Global Gaming Expo the Gaming Industry's International Trade Show and Conference. This Expo is designed to give small suppliers and vendors the chance to showcase their products directly with purchasing decision makers.

## DIVERSITY PARTNERS

### Register of Contacts

#### NATIONAL

MultiCultural Advisory Council	604.660.2203
National Association of Women Business Owners	800.55NAWBO
National Association of Black Journalists	301.445.7100
National Association of Hispanic Publishers	202.662.7250
National Association for the Advancement of Colored People	202.463.2940
National Lesbian and Gay Journalists Association	202.588.9888
Human Rights Campaign	202.628.4160
Association of African-American Women Business Owners	202.399.3645
Congressional Hispanic Caucus Institute	202.543.1771
National Hispanic Corporate Council	703.807.5137
National Newspaper Publishers Association	202.588.8764
Asian Pacific Institute for Congressional Studies	202.296.9200
Latin Chamber of Commerce	704.343.2525
Hispanic Association on Corporate Responsibility	202.835.9672
International Gay & Lesbian Travel Association	954.776.2626
League of United Latin American Citizens	202.833.6130
Women's Business Enterprise National Council	202.872.5515
National Association of Minority Contractors	713.524.6766
National Society of Minorities in Hospitality	703.549.9899
National Urban League	212.558.5300
Organization of Chinese Americans	202.223.5500
US Hispanic Chamber of Commerce	202.842.1212
Asian Chamber of Commerce	602.222.2009

**DIVERSITY PARTNERS**  
**Register of Contacts**

**LOCAL**

Pennsylvania Minority Business Development Center  
(Contact: Jacqueline Hill)

215.895.4032

## APPENDIX A

### Equal Employment Opportunity Policy

The Greenwood Gaming & Entertainment, Inc. is an equal employment opportunity employer and will comply with all federal, state and local EEO laws and with the American With Disabilities Act ("ADA"). It is the policy of Greenwood Gaming & Entertainment, Inc. to provide equal opportunity to all qualified persons without regard to race, color, religion, sex, national origin, age or disability. Greenwood Gaming & Entertainment, Inc. will not tolerate employment discrimination based upon these criteria by its Management or Supervisors and, where it is appropriate Greenwood Gaming & Entertainment, Inc. will take disciplinary action against any Managers who engage in such discrimination.

Our EEO policy shall apply to all personnel policies and employment related decisions, including, but not limited to, hiring, promotion, compensation, benefits, termination and job training. Additionally, this policy shall be applied to every phase of employee recruitment, including employment agencies, labor organizations and advertising.

We believe in the principles of equal opportunity and nondiscrimination in employment. The Company adheres to its EEO policy as a matter of sound business practice and civic responsibility.

While the Company has the primary responsibility for providing equal opportunities, all employees have responsibilities, too. Good working relationships depend on Employees as much as on Management and employee attitudes and activities are very important in ensuring that the policy's aims are achieved.

The following actions by individual employees or Managers will be regarded as gross misconduct, and will subject the individual concerned to disciplinary action, up to and including termination:

- i. Discrimination in the course of employment against fellow employees or job applicants on the basis of religion, race, color, national origin, sex, age, or the disability of an otherwise qualified individual.
- ii. Inducing or attempting to induce other employees or Management to practice unlawful discrimination.
- iii. Retaliating against individuals who have made allegations or complaints of discrimination on the basis of religion, race, color, national origin, sex, age or disability or against individuals who have provided information about such discrimination.

All instances of unlawful discrimination should be promptly reported to either the Diversity Director, the Corporate Vice President Human Resources or to General Counsel. All claims of discrimination will be promptly and thoroughly investigated. Of course, all actions taken to resolve complaints of discrimination will be conducted confidentially. Any individual can



raise concerns and make reports without fear of reprisal. The Company undertakes to investigate and resolve any complaint within fourteen days after it has been filed. Any communication from an applicant for employment, and employee, a government agency, or an attorney concerning any equal employment opportunity matter or an allegation of discrimination is to be referred to the Vice President Human Resources immediately.

## Appendix B

### Employment Law

Applicants for employment are protected by employment discrimination laws and any employee responsible for recruitment must be sensitive to legal restrictions at all stages of the hiring process.

Numerous federal, state and local laws and ordinances regulate the criteria an employer may use in making hiring decisions. All questions posed to job applicants during any pre-employment interviews must be directly related to specific job requirements or the applicant's competence. Inquiries that do not relate directly to these areas can be used by a rejected applicant to show that the employment decision was made for illegal, discriminatory reasons. Avoid the following areas of inquiry during the hiring process:

- Race, Color, Sex, Sexual Orientation, Religion, National Origin, Age, Ancestry and Handicap or Disability

An individual's race, color, sex, sexual orientation, religion, national origin, age, ancestry or handicap of an otherwise qualified person generally have no relevance to that person's ability to perform a job. Consequently, federal, state, and municipal laws prohibit reliance on any of these criteria for employment decisions. Direct questions in these areas, of course, can be illegal per se and can be used as supporting evidence that a company unlawfully discriminated in its hiring. In addition, a claim of discrimination can be supported where information about the person's age, race, etc., is elicited indirectly. For these reasons, Management personnel should never ask an applicant questions that will provide information regarding these areas, either directly or indirectly. For example, a Manager should not ask about an applicant's past national residence or citizenship, hair or eye color, place of birth, or names of relatives, as each of these may indirectly elicit prohibited information regarding the applicant. Only those questions that relate directly to the applicant's ability to perform the job are appropriate.

- Height and Weight

Reliance upon height and weight requirements adversely affects a disproportionate number of women and certain minority groups and has been found to be illegal job discrimination. There must be a direct connection between height and weight requirements and job duties to permit these factors to influence an employment decision. Management personnel should not inquire about an applicant's height and weight without reviewing the job requirements with the Vice President of Human Resources.

- Marital Status, Number of Children and Provisions for Child Care

The United States Equal Employment Opportunity Commission (EEOC) has determined that questions regarding the marital status, number of children and provisions for childcare are often used to discriminate against women. Therefore, even if this information is not intended to discriminate purposely against women, an inference of discrimination may be drawn from such questions. If information of this nature is required for other purposes, it can be obtained after an employment decision has been made.

- Age

The Age Discrimination in Employment Act (ADEA) prohibits discrimination against a job applicant because he/she is over the age of 40. Management personnel should avoid any questions that create an inference that any applicant over the age of 40 was refused employment because of his/her age.

Avoid any questions that elicit an applicant's age. This includes questions that ask the dates on which the applicant graduated from high school or college.

It is permissible to make general inquiries about an applicant's work history and past work relationships. Since such questions could tend to elicit an employee's age, refrain from such inquiries unless there is a direct relationship to job requirements. It is permissible to ask the applicant why he is leaving his present job. It is also permissible to ask the applicant to describe his or her professional relationship with past employers or supervisors. Questions or inquiries regarding past or present union affiliation are prohibited.

- Educational Requirements

The U.S. Supreme Court has found an employers requirement of a high school education discriminatory where statistics showed such a requirement operated to disqualify black applicants at a substantially higher rate than whites and there was no evidence that the requirement was significantly related to successful job performance.

This standard applies to all groups protected under Title VII and is relevant to all questions relating to educational attainment, where no direct job related requirement or business necessity could be proven.

- English Language Skill

Testing or scoring an individual in English language proficiency when the English language skill is not a requirement of the work to be performed obviously has a disparate effect upon certain minority groups and is a violation of Title VII.

- Friends or Relatives Working for the Employer

Information about friends or relatives working for an employer is not relevant to an applicant's competence. Requesting such information may be unlawful if it indicates a preference for friends or relatives of present employees and the composition of the present work force is such that this preference would reduce or eliminate opportunities for women or minority group members.

- Arrest Records

Because members of some minority groups are arrested substantially more often than whites in proportion to their numbers in the populations, making personnel decisions on the basis of arrest records involving no subsequent convictions has a disproportionate effect on the

employment opportunities of members of these groups. The Courts and the Commission, accordingly, have held that – without proof of business necessity – an employer’s use of arrest records to disqualify job applicants is unlawful discrimination. The EOC has ruled that, even if an employer does not consider arrest information, the mere request for such information tends to discourage minority applicants and is therefore illegal.

- Conviction Records

Federal Courts have held that a conviction for a felony or misdemeanor may not by itself lawfully constitute an absolute bar to employment, but that an employer may give fair consideration to the relationship between a conviction and the applicant’s fitness for a particular job. These decisions indicate that conviction records should be cause for rejection only if their number, nature and recentness would cause the applicant to be unsuitable for the position. If such inquiries are made, they should be accompanied by a statement that a conviction record will not necessarily be a bar to employment, and those factors such as age and time of the offense, seriousness and nature of the violation, and rehabilitation will be taken into account.

- Discharge from Military Service

Employers should not, as a matter of policy, reject applicants with less than honorable discharges from the military service. According to a Department of Defense study, minority service members receive a higher proportion of general and undesirable discharges than non-minority members of similar aptitude and education.

Thus, an employer’s requirement – that to be eligible for employment ex-members of the armed service must have been honorably discharged – has a disparate effect upon minorities and may be a violation of Title VII.

Appendix C

**Lawful and Unlawful Pre-Employment Inquiries**

<b>Subject</b>	<b>Lawful Pre-Employment Inquiries</b>	<b>Unlawful Pre-Employment Inquiries</b>
Notice in case of emergency	Name and address of person to be notified in case of emergency	Name and address of relative to be notified in case of emergency
Organizations	Professional societies of which the applicant is a member, excluding any of the names or character or which indicates the race, color, religion, sex, national origin or ancestry of its members.	List all organizations, club, societies and lodges to which you belong.
References	Who referred you for a position here? Names of persons willing to provide professional and/or character references for applicant.	Requirement of the submission of a religious reference.
Miscellaneous	Notice to applicant that any misstatements or omissions of material facts on the application may be cause for dismissal	
Experience	Applicant's work experience Applicant's military experience in the armed forces of the U. S., a state militia (U.S.) or in a particular branch of the U. S. armed forces.	Inquiry into general military service
Character	Have you ever been convicted of any crime? If so, when, where, and what was the disposition of the case?	
Relatives	Name of applicant's minor dependent children Do you live with your parents? Names and addresses of parents (within U.S.) or guardians of minor applicants	Name of any relative of applicant other than applicant's spouse or minor dependent children
National Origin or Ancestry	Language applicant reads, speaks or writes fluently	Applicant's nationality, lineage, ancestry, national

		<p>origin, descent or parentage.</p> <p>Date of arrival in U. S., port of entry, or how long a resident of U. S.</p> <p>Nationality of applicant's parents or spouse</p> <p>Maiden name of applicants wife or mother</p> <p>Language commonly used by applicant</p> <p>What is your Mother tongue?</p> <p>How applicant acquired ability to read, write or speak a foreign language</p>
Education	Inquiry into the academic, vocational or professional education of an applicant and the schools attended	Any inquiry asking specifically the nationality, racial or religious affiliation of a school
Photographs	Statement that photograph may be required after employment	<p>Requirement that applicant affix a photograph to the application form</p> <p>Request applicant, at applicant's option, submit a photograph</p> <p>Requirement of photograph after interview but before hiring</p>
Race or Color	Color of applicant's eyes or hair	Complexion, color of skin or other questions directly or indirectly indicating race or color
Citizenship	<p>Are you a citizen of the U. S.?</p> <p>If not, have you the legal right to remain permanently in the U.S.?</p> <p>Statement by employer that, if hired, applicant may be required to submit proof of citizenship</p> <p>Have you ever worked for this company under a different name?</p> <p>Maiden name of married female applicant, if necessary to check educational or employment records</p> <p>Have you ever been convicted of a crime under another</p>	<p>Of what country are you a citizen?</p> <p>Inquiry whether an applicant or his parents or spouse are naturalized or native-born U. S. citizens</p> <p>The date the applicant or his parents or spouse acquired citizenship</p> <p>Requirement that applicant produce his naturalization papers or first papers</p> <p>Former name of applicant whose name has been changed by court order or otherwise</p>

	name?	
Address or duration of residence	Applicant's place or residence How long applicant has been a resident of this state or city	Specific inquiry into foreign addresses which would indicate national origin
Sex	Only if nature of work or working conditions provide valid reasons	If not based on bona fide occupational qualifications
Birthplace	Can you after employment submit a birth certificate or other proof of U. S. citizenship?	Birthplace of applicant Birthplace of applicant's parents, spouse or other relatives Requirement that applicant submit birth certificate, naturalization or baptismal record
Age	Requirement that applicant submit a birth certificate or other document, after employment, as proof of age	Requirement that applicant produce proof of age in the form of birth certificate, baptismal record or certificate or age issued by school authorities
Religion		Applicant may not be told that this is a Protestant, Jewish, Atheist, etc. organization Inquiry into applicant's religious denomination, affiliation, church, parish, pastor or religious holiday observed
Work days and shifts	Statement by employer of regular days, hours or shift to be worked.	