



RIVERS
CASINO
PHILADELPHIA

Rivers Casino Philadelphia
Diversity Plan

Updated July 2023

CULTURE COUNTS

Sugarhouse HSP Gaming, LP

Diversity Plan

Sugarhouse HSP Gaming, LP (d/b/a “Rivers Casino Philadelphia”) is committed to ensuring that culture counts in every aspect of our business – our Team Members, our property and our community.

Each component of Rivers Casino’s diversity plan (the “Diversity Plan” or “Plan”) prioritizes Diversity, Equity and Inclusion (DEI); taking a robust approach to capitalize on opportunities for organizational growth, business vitality and community impact.

Diversity, Equity and Inclusion Mission Statement

The following mission statement summarizes Rivers Casino Philadelphia’s commitment to DEI and communicates our foundational principles to Team Members, guests, vendors/suppliers, and our community:

Rivers Casino Philadelphia is committed to fostering a culture where our team members feel recognized and supported, our guests enjoy a welcoming and inclusive entertainment experience, and our partnerships and philanthropic efforts drive equitable impact throughout the Greater Philadelphia region.

- *Rivers strives to recruit and retain a dynamic workforce that reflects the diversity of our guests and surrounding communities. Through investments in workplace culture and team member experience, Rivers will establish itself as a preferred employer of choice.*
- *Guest satisfaction fuels economic vitality and sustains business growth. Leveraging data and customer/vendor feedback will identify opportunities to enhance connectivity with diverse suppliers and maximize the customer experience, solidifying Rivers as a premiere entertainment destination.*
- *Greater Philadelphia has a vibrant ecosystem full of rich history and distinct character. The City’s primary areas for growth (Poverty, public safety, education & workforce development, health & wellness, and arts & culture,) can serve as a guide for our support and resource allocation. A thoughtful approach to advocacy, engagement and impact can position Rivers as a business leader in the region.*

Culture Counts: Leadership

Rivers Casino Philadelphia’s Director of Diversity, Equity & Inclusion is spearheading DEI efforts, providing leadership, vision and counsel; strategic planning, research, training and professional development, communication and the implementation of a DEI Strategic plan.

The strategic plan will have support from leadership and buy-in from different departments to ensure holistic impact. The Director of DEI will serve as the lead for Rivers Casino Philadelphia’s Diversity Task Force, which is composed of Senior Team Members of the following departments: Human Resources, Finance, Compliance, Community Relations and Property Leadership. The Task Force will meet on a quarterly basis to ensure that Rivers Casino Philadelphia meets the commitments of its DEI plan.

Culture Counts: Diversity Task Force

The Director of DEI, in collaboration with the Diversity Task Force, shall serve as an accountability monitor for the company's DEI Strategic Plan.

Duties of the Diversity Task Force include but are not limited to:

- Review quarterly and annual reports and documentation for submission to the Pennsylvania Gaming Control Board (PGCB) as required.
- Analyze data to highlight areas of strength and identify opportunities for improvement.
- Collaborate with Human Resources to maximize connectivity with higher education institutions, post-secondary training programs, workforce development job sourcing entities and more.
- Develop Training & Development programs for Team Members.
- Work with the Finance and Procurement teams on the creation of a Diverse Vendor and Supplier database to increase Minority, Women, and Disadvantaged Business Enterprises (MWDBE).
- Drive impact in the communities Rivers Casino Philadelphia serves by identifying recipients of sponsorships, donations and other charitable offerings.
- Provide consistent updates to property leadership regarding DEI plan progress.

Culture Counts: Team Member Diversity

Rivers Casino Philadelphia will implement a number of steps to ensure that the DEI Plan is followed in the recruitment and retaining of team members:

- Open communication between Human Resources and Managers/Supervisors regarding vacant positions.
- Distribution of job listings to recruitment sources, including workforce development agencies and community-based organizations that are equipped to reach under-resourced populations.
- Distribution of job listings to local colleges, universities, community colleges, trade schools and other organizations that are involved in higher education.
- ESL Employment Literature
 - Work with Human Resources to identify primary English as a Second Language (ESL) prospective and current team members.
 - Create applications, recruiting collateral and other literature in those primary languages.
- Culture Counts Cards
 - Create digital and print cards that list our Mission and Team/Property/Community Values
 - Distribute to prospective team members at recruiting events, walk-in Wednesdays, etc.
- DEI @ New Hire Orientation
 - Director of DEI attends new hire orientation to give provide overview of why Culture Counts at Rivers.

College Recruitment

The Human Resources Department will issue notices to career service departments of colleges and universities on a local, state and national level, informing them of our Diversity and Inclusion Mission Statement and initiatives to promote a diverse workforce and will inform them of Rivers Casino Philadelphia's interest in interviewing students and graduates whose educational training and background have prepared them for opportunities within our industry.

Leadership Development

Rivers Casino Philadelphia provides internal development opportunities for all team members. Each team member has the opportunity to continue to develop as part of their career path and succession planning for progressive responsibilities. Each Department Leader will have the responsibility to develop Team Members for advancement within the company and encourage each team member to take advantage of the necessary training that will enable them the opportunity to qualify for a current or future open position. The Vice President of Human Resources/Task Force/Director of Diversity, Equity & Inclusion will monitor each department to ensure that all Team Members are given the opportunity to participate in all programs for advancement.

Diversity Awareness Training for Team Members

As part of Rivers Casino Philadelphia's core courses, all team members will be required to complete the Diversity Awareness Training Program during employee orientation. This Diversity training will focus on building an awareness of the valued differences of fellow team members and guests. Our diversity training efforts will be designed to ensure that all team members are aware of the company's diversity philosophy, and incorporate this philosophy in their day to day practices within the workplace. In order to provide the very best guest service, it is necessary for our team members to understand the importance and have an appreciation of people's differences.

Complaint Resolution Process

Rivers Casino is committed to maintaining a productive work environment, free of any conduct in violation of the Anti-Harassment and Anti-Discrimination policy. Rivers Casino Philadelphia will encourage fair treatment of all Team Members and discourages the harassment, intimidation or coercion of any Team Member. The following process to resolve discrimination and harassment complaints will be as follows:

- In the event that any conduct perceived to be in violation of the Anti-Harassment and Anti-Discrimination policy occurs, Team Members are encouraged to immediately report the matter to their department supervisor/manager or any other supervisor/manager with whom the Team Member feels comfortable. If a Team Member is unsure of with whom to raise a concern, or if a

If a Team Member has not received a satisfactory response within five business days after reporting any incident of what the Team Member perceives to be a violation of the Anti-Harassment and Anti-Discrimination policy, they should immediately contact the Vice President of Human

Resources or a management level HR Team Member. Team Members also have the option of contacting River's Casino's Ethics Hotline at (866) 934-2417 to report any such concerns.

- Human Resources will see that an investigation is timely conducted. Every report of perceived harassment will be appropriately investigated, and corrective action will be taken where appropriate. Rivers Casino will attempt to protect the confidentiality of harassment complaints to the extent consistent with an appropriate investigation and within the constraints of applicable law.
- Violation of this policy will result in disciplinary action, up to and including discharge for any Team Member who violates this policy. In addition, Rivers Casino prohibits any form of retaliation by any individual against individuals who in good faith report a perceived violation of this policy or who cooperate in the investigation of such reports in accordance with this policy and Rivers Casino will take appropriate disciplinary action for any such retaliation.
- Any supervisor or manager who becomes aware of conduct in violation of the Anti-Harassment and Anti-Discrimination policy must immediately advise the Human Resources Department so it can be investigated in a timely manner. If requested, all Team Members are required to provide assistance in any investigation. Failure to participate may be grounds for disciplinary action, up to and including termination, unless the refusal to participate is legally protected.

Culture Counts: Diverse Suppliers and Vendors

The Vice President of Finance and the Director of Diversity, Equity & Inclusion will share the responsibility for identifying and encouraging the participation of minority, disadvantaged, and women-owned businesses.

The Director of Diversity, Equity & Inclusion and Vice President of Finance will encourage representation and participation of diverse groups in the ownership and operation of businesses that will serve the facility and provide goods and services to the facility. We are committed to procuring goods, products, and services from a diversified pool of vendors and professional service providers. Our strategy is to work with a broad range of suppliers that are competitive in quality, service, and price. All suppliers are encouraged to support diversity efforts through the use of second-tier supplier programs.

Rivers Casino Philadelphia will take the following actions:

- Rivers Casino Philadelphia will utilize the list of the minority and women's business enterprises that are pre-qualified by the Bureau of Minority and Women's Business Enterprises of the Pennsylvania Department of General Services to seek goods and services from diverse vendors.

- Rivers Casino Philadelphia will “partner” with local organizations within the Greater Philadelphia Metropolitan area, including but not limited to, the City of Philadelphia Office of Economic Opportunity, the African-American Chamber of Commerce of PA, NJ and DE, the Asian-American Chamber of Commerce of Greater Philadelphia, the Greater Philadelphia Hispanic Chamber of Commerce, the Minority Supplier Development Council of PA, NJ and DE, the Women’s Business Enterprise Council of PA, DE, and NJ, and the Pennsylvania Minority Business Enterprise Council.
- Rivers Casino Philadelphia will have a submission form on its website www.riverscasino.com/philadelphia/vendors so that vendors can communicate directly with the Procurement Team. Additionally, the company’s website provides informational assistance, such as vendor licensing requirements and vendor Terms & Conditions.
- Rivers Casino Philadelphia purchasing personnel will help qualified vendors and suppliers (as defined by the Pennsylvania Department of General Services), where necessary, by providing pertinent information and feedback so that they can compete effectively on price, service and product quality.
- Rivers Casino Philadelphia personnel will track dollar volume and performance of suppliers and vendors and provide reports/data to the Director of Diversity, Equity & Inclusion to monitor compliance with the Diversity Plan.
- Rivers Casino Philadelphia through the Director of Diversity, Equity & Inclusion collects data and issues reports needed for periodic diversity reporting, including quarterly participation reports as defined and required by PGCB.
- The Vice President of Finance and Director of Diversity, Equity & Inclusion continuously work on developing a MWDBE network and the implementation of the Diversity Plan.
- Rivers Casino Philadelphia purchasing personnel and internal end-users are trained on supplier diversity policies and procedures and compliance requirements.

Culture Counts: Our Community

- Philadelphia First
 - Major investments in 1-2 large-scale events.
 - Prioritize partnerships with organizations founded and/or headquartered within Philadelphia County, ensuring identifiable impact of allocated resources.
- Rivers Gives
 - Identify under-resourced populations and groups as recipients of partnerships, sponsorships, volunteerism and general support.
 - Branding our efforts (clothing, signage, etc.) for internal alignment and external recognition
 - Galvanize team members to volunteer and/or support charitable causes.
 - Create annual content wrap-ups that highlight Rivers Gives efforts for internal and external visibility.
 - Track volunteer hours and dollars allocated.

- Change Makes a Difference Program
 - Identify local organizations as monthly and quarterly recipients.
 - Create a multiyear recipient calendar that incorporates new organizations annually.
 - Celebrate partnerships with visits to the recipients' sites and/or invitations to our property.
 - Use the program as a stepping stone for more impactful partnerships with respective recipients.
- River Wards Orgs/Registered Community Organizations (RCO)
 - Cultivate a collaborative relationship with the Penn Treaty Special Services District, in accordance with the Community Benefits Agreement.
 - Partner with local organizations (Fishtown Neighbors Association, Northern Liberties Neighbors Association, Olde Richmond Civic Association, South Kensington Community Partners) to align community goals for collective benefit.
 - Align with Philadelphia RCO's that take a grassroots approach towards advocacy, engagement and impact.

Culture Counts: Audit and Reporting System

Internal Progress Reports

The Director of Diversity, Equity & Inclusion and Task Force shall monitor company progress to carry out the Diversity and Inclusion Plan. The Director of Diversity, Equity & Inclusion/Task Force shall receive employment and procurement activity reports for each department and M/W/DBE participation reports, at a minimum on a quarterly basis. These reports shall be used to compile a periodic progress report to be submitted to the Diversity Plan Task Force for review and comments. The Task Force shall assist department managers and supervisors and project site managers by recommending specific actions.

Report of Participation

Rivers Casino Philadelphia shall file a quarterly report with the PGCB which sets forth the Company's performance in fulfilling the goals of this Diversity and Inclusion Plan. The report shall contain all of the following:

- Employment data, including information on minority and women representation in the workforce in all job classifications; average salary ranges; 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 and/or subcontractors awarded for goods and services.
- An identification of each subcontract actually awarded to a minority or women-owned business enterprise under contracts containing a participation plan during each calendar quarter and the actual value of each such subcontract.
- A comprehensive description of all efforts made by the licensed entity or applicant to monitor and enforce the participation plan.

- Information on minority and women investment, equity ownership, and other ownership or employment opportunities initiated or promoted by the licensed entity.
- Other information deemed necessary or desirable by the PGCB to ensure compliance with the rules and regulations governing gaming in Pennsylvania.