



# **Diversity and Inclusion Plan**

Live! Casino and Hotel Philadelphia

April 2020

## TABLE OF CONTENTS

Diversity Vision and Mission .....	3
Statement of Goals .....	3
Leadership Roles and Responsibilities .....	3
Property Diversity Committee .....	4
<i>Committee Composition</i> .....	4
<i>Duties and Responsibilities</i> .....	4
Recruitment and Employment Programs .....	5
Diversity and Inclusion Employment Practices .....	6
<i>Equal Opportunity Policy</i> .....	6
<i>Non-Discrimination Commitment</i> .....	6
<i>Open Door Policy</i> .....	7
<i>Anti-Harassment Policy</i> .....	7
<i>Anti-Retaliation Policy</i> .....	8
<i>Complaint Resolution Policy</i> .....	8
Vendor and Supplier Diversity .....	9
<i>Key Vendor and Supplier Diversity Actions</i> .....	10
Internal Communication .....	10
Internal Auditing and Reporting .....	11

## DIVERSITY VISION AND MISSION

Live! Casino and Hotel Philadelphia (“Live!”) values its Team Members and business partners as integral keys to its success. Live! has established this Diversity and Inclusion Plan to assure that all its policies and practices support the central goal of equal opportunity in all aspects of employment, procurement, contracting and community involvement. Each component of this Diversity and Inclusion Plan is designed to enable Live! to reach its goal of being an employer of choice and the region’s premier choice for gaming and entertainment.

Live! Casino and Hotel’s vision for diversity and inclusion is to leverage the unique talents, strengths, and assets of our Team Members and business partner community in order to provide the region’s overwhelming first choice of gaming and entertainment. Live! will continuously strive to maintain an environment in which everyone feels valued, accepted, and rewarded as an integral part of the team. We encourage Team Members to understand and recognize difference and to appreciate the contributions that all diverse groups and individuals bring to the system. Our top management believes in the value of a diverse and inclusive work force.

## STATEMENT OF GOALS

- We are committed to establishing a diverse workforce by ensuring consistency, fairness and inclusion in the recruitment, selection and the career development process.
- We promote diversity by ensuring equal opportunity in the procurement of contractors, sub-contractors, assignees, lessees, agents and suppliers.
- We are focused on create an open and welcoming atmosphere at all our properties where team members, guests and vendors feel comfortable and welcome.
- We actively seek out minority and women and other historically underrepresented groups to provide opportunities for them to bid on providing services and/or supplies.
- We are committed to being a strong financial supporter of a diverse number of worthwhile community charities and non-profit organizations through our community reinvestment and giving programs.

## LEADERSHIP ROLES AND RESPONSIBILITIES

### General Manager Responsibilities

The property General Manager is ultimately accountable for ensuring that the appropriate Diversity and Inclusion activities are being executed and documented as outlined in this plan. The General Manager champions all Diversity and Inclusion related activities and regularly communicates the company’s plan and goals, while providing all the necessary tools and resources needed to successfully execute the plan.

### Vice President of Human Resources Responsibilities

The Vice President of Human Resources champions Diversity and Inclusion related efforts to ensure there is an inclusive approach and efforts are developed and implemented across all

departments. The Vice President of Human Resources monitors and regularly reports on the adherence, consistency and value of all diversity efforts and ensures that the property is providing the best and good faith effort to achieving its Team Member diversity employment goals. In addition, the Vice President of Human Resources ensures that committee obligations and objectives are being met.

#### Chief Financial Officer Responsibilities

The property Chief Financial Officer is responsible for ensuring all good faith efforts are made in the procurement of the property M/W/DSBE's goals. With the support of the property procurement department, the CFO ensures the property is seeking bids from professional services and suppliers of under-represented groups. The Chief Financial Officer is also a strong financial supporter of diverse community charities and non-profits through our community reinvestment and giving programs.

#### Senior Property Leader Responsibilities

Directors, Vice Presidents and Senior Vice Presidents are considered Senior Leaders on property. Senior Leaders are responsible for ensuring that Diversity and Inclusion efforts and activities are carried out in accordance to the plan in each of their departments. Senior leaders also ensure that Diversity and Inclusion is alive and celebrated in each of their departments.

## PROPERTY DIVERSITY COMMITTEE

At Live! Casino and Hotel Philadelphia, the General Manager will lead a Co-Chaired Diversity Committee established to monitor the best and good faith efforts in meeting the property's diversity mission and goals.

### *COMMITTEE COMPOSITION*

The Diversity Committee, will consist of the following individuals:

- EVP/Property General Manager
- Vice President of Human Resources (Co-Chair)
- Chief Financial Officer (Co-Chair)
- Purchasing Leader or assigned purchasing designee
- Compliance Leader or assigned compliance designee

### *DUTIES AND RESPONSIBILITIES*

The Diversity Co-Chairs, together with the Diversity Committee, shall meet quarterly to ensure that the following responsibilities and duties are fulfilled:

- Developing policy statements and diversity programs to support the Diversity and Inclusion Plan.

- Developing and executing internal and external communication including:
  - The dissemination of the Diversity and Inclusion Mission Statement throughout the company as well as to business partners, prospective Team Members, Team Members, contractors and vendors.
- Supporting and assisting all levels of leadership in the implementation of the Diversity and Inclusion Plan, in addition to arriving at solutions to perceived obstacles.
- Designing and reporting information that will:
  - Measure the effectiveness of the Diversity and Inclusion Plan;
  - Identify areas with opportunities for improvement;
  - Determine the degree to which objectives have been attained;
  - Provide all required statistical reports and documentation to the Pennsylvania Gaming Control Board (the “PGCB”) as required.
- Performing periodic reviews of hires, promotions, terminations, job classifications, management and supervisory practices, work assignments, training, upward mobility programs, and other terms and conditions of employment as necessary, to ensure adherence to the goals of the Diversity and Inclusion Plan.
- Serving as liaison between Live! Casino and Hotel and workforce agencies focused on developing employment opportunities for minorities and women, community-based civic organizations, and other non-profit community service agencies.
- Ensuring clear and regular communication of the plan including:
  - Making the plan available to team members electronically and/or Team Member common areas.
  - Keeping all levels of leadership informed of the latest developments pertaining to diversity and monitoring best practices in diversity among gaming companies.
- Assisting the purchasing department in fulfilling the goal of creating participation opportunities for diverse groups in the supply of goods and services to the facility.
- Assisting the purchasing department in the development of a diverse vendor and supplier data base in order to better ensure participation by minority, women, and disadvantaged business entities (“M/W/DBE’s”).

## RECRUITMENT AND EMPLOYMENT PROGRAMS

Live! Casino and Hotel has instituted initiatives to achieve specific diversity and inclusion action goals. These initiatives include:

- Diversity and Inclusion training programs to enhance the knowledge and understanding of the value of a diverse workforce and a company culture of equality;
- Evaluating the total selection process to ensure freedom from bias through:
  - Reviewing employment related documents to include job applications and pre-employment inquiries to ensure information request is job related.
  - Evaluating recruiting and selection methods to assure they target a broad range of prospective applicants; and
  - Training leadership team on proper interview technique.
  - Making job descriptions available to recruiting sources and all members of management involved in the recruiting, screening, selection and promotion processes

- Posting open jobs on the external careers and/or the internal careers section of the Live! Casino and Hotel Philadelphia website.
- Using the following techniques to improve recruitment and increase the flow of minority and female applicants:
  - Include the phrase “Equal Opportunity Employer” in digital and printed employment advertisements;
  - Disseminate job opportunity information to organizations representing minorities, women and employment development agencies;
  - Actively partner with and recruit at community organizations, educational institutes which attract minority and female individuals; and
  - Encourage all team members to refer qualified applicants and reward successful placements.
- Monitoring and evaluating diversity by department and organizational level to gauge progress toward goals.

## DIVERSITY AND INCLUSION EMPLOYMENT PRACTICES

### *EQUAL OPPORTUNITY POLICY*

Live! Casino & Hotel is an equal employment opportunity employer. Live! Casino & Hotel will recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, national origin or ancestry, sex, age, marital status, sexual orientation, gender identity, genetic information, disability, veteran status, or any other legally protected status under local, state, or federal law. The Company will make employment decisions that further the principle of equal employment opportunity. The Company will ensure that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid and nondiscriminatory requirements for promotional opportunities. The Company also will ensure that all personnel decisions and actions, including but not limited to, compensation, benefits, transfers, promotions, layoffs, returns from layoff, discipline, terminations, Company-sponsored training, education, and social and recreation programs will be administered without regard to race, color, religion, national origin or ancestry, sex, age, marital status, sexual orientation, genetic information, disability, veteran status, or any other legally protected status under local, state, or federal law.

### *NON-DISCRIMINATION COMMITMENT*

Live! Casino & Hotel, consistent with its philosophy of equal employment opportunity, reaffirms its policy of non-discrimination against qualified individuals in its employment practices, including job application procedures, recruiting, advertising, hiring, termination, advancement, compensation, training and other terms, conditions and privileges of employment, in accordance with federal, state and local laws.

Live! Casino & Hotel also reaffirms its policy of non-discrimination against qualified individuals with disabilities in all its employment practices, including job application procedures, recruiting, advertising, hiring, termination, advancement, compensation, training and other terms, conditions and privileges of employment. It is the Company's policy to evaluate all applicants on the basis of their qualifications without regard to any disability to the extent required by law. Likewise, all Team Members can expect to be treated equally in all employment decisions without regard to disability to the extent required by law.

### *OPEN DOOR POLICY*

We strongly encourage team members to share concerns, seek information, provide input, and resolve problems/issues with their supervisor. Management is expected to listen to team member concerns, to encourage their input and to seek resolution to problems/issues.

Live! Casino & Hotel is committed to an Open-Door Policy with regards to work related questions, or problems that may concern a Team Member. Team Members who have issues pertaining harassment, discrimination or retaliation should follow the specific procedures set forth in the Discrimination, Harassment and Retaliation Policy, located in the Team Member Handbook. This policy encourages team members to have a discussion with their supervisor first. If the team member believes that that would be unproductive or they have attempted to address the concern with their supervisor and the situation remains unresolved, the team member may then contact their department manager or a member of the human resources team.

Additionally, Live! Casino & Hotel will provide an electronic forum, located in the Team Member Dining Room (TDR), that allows every Team Member to communicate directly to management with suggestions or concerns, or to supply information that may be relevant to business operations.

### *ANTI-HARASSMENT POLICY*

Live! Casino & Hotel is committed to providing a work environment that is free from all forms of unlawful harassment, intimidation or retaliation for opposing such conduct. Live! Casino and Hotel will comply with all applicable federal/state and local laws relating to harassment in the workplace. Live! Casino and Hotel does not tolerate any form of harassment, joking remarks or other conduct (including verbal, non-verbal, or physical conduct) that demeans or shows hostility toward an individual based on these prohibited reasons and that creates an intimidating, environment, unreasonably interferes with an individual's work performance or otherwise adversely affects an individual's employment opportunities. Discrimination or harassment of a Live! Casino & Hotel Team Member, whether by another Team Member, customer, supplier, vendor, or other individuals present in the work environment, will not be tolerated.

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

All Team Members have a right to work in an environment free of discrimination, which includes freedom from harassment. Live! Casino & Hotel prohibits unlawful harassment of its Team Members in any form. Such conduct may result in disciplinary action up to and including dismissal.

### *ANTI-RETALIATION POLICY*

Live! Casino & Hotel strictly prohibits any form of retaliation against any Team Member or applicant who has:

- Made a good faith complaint as to an incident of harassment, discrimination or retaliation in violation under this policy.
- Any other Team Member who cooperates in any manner in a good faith investigation of a complaint.

Prohibited retaliation includes, but is not limited to: termination, demotion, suspension, and failure to hire or consider hiring, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit. Any person who engages in retaliatory conduct of any type may be subject to disciplinary action, up to and including termination.

### *COMPLAINT RESOLUTION POLICY*

All Team Members are required to ensure that Live! Casino & Hotel maintains a workplace that is free of harassment, discrimination, and retaliation. These Policies place an obligation on all Team Members on duty to promptly report any harassment or discrimination that they have been subjected to, witnessed, or of which they become aware. If any Team Member is subjected to, has witnessed or has become aware of any harassment in violation of any of these Policies, that Team Member must notify his or her direct Supervisor immediately. All Supervisors and Managers are required to immediately report all complaints that come to their attention under



this policy to the Human Resources Department. All internal investigations are to be administered by either the Human Resources or Surveillance Department. If a Team Member is unable or uncomfortable about discussing this issue with his or her department head, then the issue must be reported immediately to the Human Resources Department.

No Team Member will be retaliated against for making a complaint or for cooperating in the investigation of complaints. The Company considers retaliation to be a serious violation of this Policy and requests Team Members to report any incidents of retaliation immediately to the Human Resources Department or to the General Manager. The Company will investigate and resolve reports of retaliation or false allegations and Team Members may be subject to disciplinary action up to and including termination of employment.

## VENDOR AND SUPPLIER DIVERSITY

Live! Casino and Hotel Philadelphia strives to ensure all best and good faith efforts are made toward the property's vendor and supplier diversity and inclusion goals.

### *DEFINITIONS*

**DIS Disabled Business Enterprise**

DIS are businesses that are at least 51% owned and controlled by a disabled individual.

**DVET Disabled Veterans Business Enterprise**

DVET are businesses that are at least 51% owned and controlled by one or more disabled veterans.

**LBE Local Business Enterprises**

Business located in the state of Pennsylvania

**MBE Minority Owned Business Enterprise**

MBE businesses are at least 51% owned and controlled by individuals belonging to certain ethnic minority groups. Ethnic minorities are United States citizens who are Asian, African American, Hispanic or Native American.

**M/WBEMinority Women Owned Business Enterprise**

M/WBE businesses are at least 51% owned and controlled by citizens belonging to certain minority groups and/or a person of female gender.

**VET Veteran Owned Business Enterprise**

VET businesses are at least 51% owned by individuals who are veterans of the U.S. Armed Forces.

**WBE Women Owned Business Enterprise**

WBE businesses are at least 51% owned and controlled by a person who is female in gender.

Goals on the above vendor and supplier diversity areas were communicated and agreed to under the Economic Opportunity Plan (EOP) and the City of Philadelphia. Live! Casino and Hotel Philadelphia will strive to meet and/or exceed these goals by engaging in critical vendor and supplier diversity actions.

### *KEY VENDOR AND SUPPLIER DIVERSITY ACTIONS*

- Review and improve our supplier diversity website for MBE, WBE and DBE online registration.
- Build internal processes and tracking mechanisms that drive vendor and supplier diversity actions.
- Be an active participant in diversity focused trade shows, conferences and conventions such as the Minority Supplier Development Council, NAACP, Hispanic Chamber of Commerce, African American Chamber of Commerce, and Asian American Chamber of Commerce.
- Host regular vendor meetings with our buyers to discuss enriching business partnerships through diversity and inclusion.
- Identify opportunities to mentor MBE, WBE businesses to include them in our supplier pipeline.

## COMMUNICATION AND DISSEMINATION OF PLAN CONTENTS

Live! Casino and Hotel Philadelphia understands that communication and understanding of this plan at all levels is vital to our success. Dissemination of information shall include the following:

### *INTERNAL COMMUNICATION*

- Diversity and Inclusion company policies will be available to all team members in the Live! Handbook, assessible in electronic form on a team site.
- Live! will train all team members at all levels on the Diversity and Inclusion goals and best practices.
- Live! will post all relevant Diversity and Inclusion information in team member communication areas back of house.

## INTERNAL AUDITING AND REPORTING

The Diversity Committee Co- Leaders, in coordination with the entire Diversity Committee, are responsible for the effective implementation of the Diversity Plan; however, responsibility is likewise vested with each member of management. The following documents are maintained as a component of the Live! Casino and Hotel's internal audit process:

- Completion of EEO-1 Reporting;
- Summary data of external job offers, hires, promotions, resignations, terminations, and layoffs/reductions;
- Utilization and recording of self-identification forms;
- Applicant information report showing relative information for qualified candidates;
- Evaluation of employee relations incidents to include terminations and grievances;
- Reporting on vendor/contractor business volumes with MBE/WBE/DBE
- Statistics on contacts and partnerships with outside organizations in furtherance of diversity outreach efforts;
- Filing quarterly and annual reports on Diversity Plan compliance with the PA Gaming Control Board and other appropriate regulatory agencies.
- All other information deemed necessary or desirable by the PGCB to ensure compliance with the rules and regulations governing gaming in Pennsylvania.