



WINNING THROUGH DIVERSITY

Holdings Acquisition Co, L.P.

Diversity Plan

Holdings Acquisition Co, L.P. d/b/a “Rivers Casino Pittsburgh” is committed to the principle of winning through diversity and inclusion at all levels – ownership, participation and operations and contracting.

Rivers Casino Pittsburgh recognizes that attracting a diverse pool of talented people and retaining them in positions at all levels of the company is essential to our success. In addition, Rivers Casino Pittsburgh believes that it must be able to contract for goods and services with diverse vendors and suppliers in order to be successful. Each component of this diversity plan (the “Diversity Plan” or “Plan”) is designed to enable Rivers Casino Pittsburgh to reach its goal of reaching the top of the gaming industry.

DIVERSITY AND INCLUSION MISSION STATEMENT

The following mission statement summarizes Rivers Casino Pittsburgh commitment to diversity. It will be posted in prominent places throughout the facility. It communicates the foundation of our diversity and inclusion mission to Team Members, business partners and our community:

Rivers Casino Pittsburgh is devoted to building and nurturing a diverse and inclusive environment, and is committed to equal opportunity employment and participation by all Team Members in all employment classifications throughout the organization. This commitment to equal opportunities and diversity also applies to our vendors, suppliers and independent contractors.

- *We are committed to recruiting, employing, training and advancing talented people of any race, ethnicity, gender, color, national origin, ancestry, sex, sexual orientation, sexual identity and expression, marital status, family status, lifestyle, age, culture, religion, military and veteran status, citizenship, or disability.*
- *We actively search for a diverse pool of candidates to provide us with a depth of talent, skills and potential to meet our goals in all employment levels of our operation.*
- *We celebrate our diversified employee base and appreciate its cooperative power as a means to meet our business goals.*
- *We are committed to offer opportunities to diverse vendors, suppliers, contractors and other service providers from throughout Allegheny County and surrounding counties to enhance the participation of such groups in the success of our facility.*
- *We require that our contractors and vendors practice equal opportunity policies when they deal with others who provide goods or services to us.*

Rivers Casino Pittsburgh believes that when we partner with diverse persons and businesses, there are limitless opportunities to share knowledge and expertise, and to ultimately assist each other to grow and succeed.

LEADING TO WIN

A strategic plan must be driven from the highest levels of a company if the plan is to succeed. At Rivers Casino Pittsburgh the ultimate responsibility for winning through diversity lies with the General Manager who will serve as the Chief Diversity Officer (the “Chief Diversity Officer”). The Chief Diversity Officer is responsible for strategic planning and evaluation of each department’s success in the implementation of the Diversity and Inclusion Plan. Rivers Casino Pittsburgh will also have a designated diversity director (“DD” or “Diversity Director”) who will provide reports to the General Manager and operate with the authority of the General Manager to monitor the Diversity and Inclusion Plan and other related initiatives. The DD will be appointed by the General Manager. The Diversity and Inclusion Task Force shall be comprised of Senior Team Members of the following departments: Procurement, Human Resources, Finance, Food and Beverage, Table Games, Marketing, Legal, Compliance and Community Relations. The Task Force will meet with the management team on a quarterly basis to ensure that Rivers Casino Pittsburgh meets the commitments of this Diversity and Inclusion plan.

ORGANIZED TO WIN

The Diversity Director, together with the Diversity and Inclusion Task Force, shall serve as the monitor for accountability for Team Member’s involvement in fulfilling the company’s Diversity and Inclusion Plan.

The Diversity and Inclusion Task Force

The Diversity Director and Task Force duties shall include:

- Developing policy statements and diversity programs to effectuate 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.
- Identifying opportunities for improvement.
- Assisting line management in implementation of Rivers Casino Pittsburgh Diversity and Inclusion Plan and in arriving at solutions to any perceived impediments.
- 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.
- Serving as liaison between Rivers Casino Pittsburgh and law enforcement agencies, local organizations concerned with employment opportunities for minorities and women, community action groups and community service programs.
- 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.

- Ensuring that the Diversity and Inclusion Plan's Mission Statement is identified and posted in Team Member areas.
- 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 database in order to better ensure participation by minority, women, and disadvantaged business entities ("M/W/DBE's").

Developing Winning Managers and Supervisors

Rivers Casino Pittsburgh managers and supervisors are responsible for implementation of the Diversity and Inclusion Plan and the goal of winning through diversity. The responsibilities of managers and supervisors include:

- Assisting in the identification of opportunities for improvement and the establishment of unit objectives, which will be developed and reviewed on an ongoing basis.
- Encourage fair treatment of all Team Members and discouraging the harassment, intimidation or coercion of any Team Member.
- Encouraging all Team Members, to participate in company-provided training programs that can assist in their advancement.
- Promoting and fostering a collaborative work environment that celebrates and respects diversity.

WINNING PROGRAMS: DIVERSE TEAM MEMBERS AT ALL LEVELS OF THE COMPANY

Recruiting Practices

Rivers Casino Pittsburgh has implemented a number of concrete steps to ensure that this Plan is followed in the recruitment of Team Members at the Rivers Casino Pittsburgh:

- The Human Resources Department in collaboration with the Diversity Director/Task Force will develop an Employment Diversity Council comprised of representatives from various functional areas who have decision-making authority. The EDC will meet quarterly to establish strategies, goals, and objectives to secure a diverse workforce.
- Human Resources will notify all Managers on a regular basis of all open positions. The Employment Center is in constant communication with Managers and above in regards to open positions and recruitment efforts.
- A list of job openings will be distributed on a regular basis to recruitment sources with the ability to reach disadvantaged persons, community action agencies and minority sources. An updated open position listing is sent out on a bi-monthly basis to all of our community outreach groups.
- A list of job openings will be distributed on a regular basis to local colleges, universities, community colleges, trade schools and other organizations that are involved in higher education. An updated open position listing is sent out on a bi-monthly basis to all of our local colleges and universities.
- Rivers Casino Pittsburgh will also have an informational employment section on its website explaining our Diversity Mission Statement and list available job openings, and when possible links to community action agencies with which Rivers Casino Pittsburgh have partnered.

- Available positions at Rivers Casino Pittsburgh will be posted on our Company web-site with a brief description and minimum requirements so that all qualified internal Team Members and qualified external applicants will have an opportunity to apply. All open positions are posted generally for three days on our internal website prior to being posted externally.
- When advertising for employment opportunities Rivers Casino Pittsburgh will advertise using typical advertising means and will include advertising in minority publications in Allegheny County and surrounding counties, and other publications designed to reach a diverse pool of applicants.
- Human Resources/the Diversity Director will take appropriate measures to identify and coordinate recruitment efforts with employment sources serving disadvantaged and minority persons. We have positive relationships with over 100 community organizations and visit them on a regular basis to include doing presentations on employment opportunities with Rivers Casino Pittsburgh, conducting pre-screen interviews on-site for their clients, participating in mock interview sessions with their clients as well as job fairs.
- The Human Resources Department in collaboration with the Diversity Director/ Task Force will review and implement on a regular basis additional ways to improve the pool of diverse candidates for all openings.

Job Postings

All positions will be posted for a minimum of three (3) days and maintained on the Employment section of the Rivers Casino Pittsburgh website and/or other areas of the casino. The positions are posted on the internal and external websites. We maintain an open positions listing on a bulletin board outside of the Human Resources office and we maintain current job postings on our company intranet.

Applicant Referral Process

- All applicants, internal and external, shall be referred to Human Resources.
- Human Resources will identify all qualified internal applicants for positions and refer them to Department Managers for consideration.
- Human Resources will identify all qualified external applicants for position openings, once the position has been posted on the company website www.riverscasino.com/pittsburgh for a minimum of three (3) days. All qualified applicants will be referred to Department Managers to be interviewed.

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' interest in interviewing students and graduates whose educational training and background have prepared them for opportunities within our industry. The A.C.E. (Achieving Career Excellence) Program was rolled out to local colleges and universities in February of 2012. Selected interns will complete a 12-week internship program that will supplement their classroom learning while providing them practical experience working at Rivers Casino Pittsburgh in their field of interest. Rivers Casino intends to continuously strengthen and expand the internship program.

Career Fairs

Human Resources and/or the Diversity Director and Task Force members or their representatives shall attend career fairs in which minorities and females traditionally participate and distribute information which describes the job opportunities available and company sponsored training programs. We attend between 8-16 career fairs annually, as business needs permit, and always have information on hand describing career opportunities at Rivers Casino Pittsburgh.

Leadership Development

Rivers Casino Pittsburgh 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/ Diversity Director will monitor each department to ensure that all Team Members are given the opportunity to participate in all programs for advancement.

Diversity and Inclusion Training for Team Members

All Team Members will be required to complete a Diversity and Inclusion training during employee orientation. This training will focus on developing the knowledge, awareness, and skills to build and sustain an inclusive environment. 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.

All managers and supervisors will be required to complete a Diversity and Inclusion training program. In addition to the management Development core courses all management will be required to undergo training that is focused on recognizing and appreciating individual differences of all Team Members and guests. Rivers Casino Pittsburgh will not tolerate unlawful harassment or discrimination and is committed to a workplace free of any such harassment or discrimination.

Reporting Perceived Harassment or Discrimination

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 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, you should immediately contact the Vice President of Human Resources or a management level HR Team Member. Team Members also have the option of contacting Rivers Casino Pittsburgh's Ethics Hotline at (877) 566-8455 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 Pittsburgh 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 Pittsburgh 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 Pittsburgh 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.

Rivers Casino Pittsburgh is committed to maintaining a productive work environment, free of any conduct in violation of the Anti-Harassment and Anti-Discrimination policy. Team Members with questions or concerns will be provided with appropriate timely responses. A Team Member with questions about this policy is encouraged to contact a management level HR Team Member or any other supervisor/manager with whom the Team Member feels comfortable. Team Members also have the option of contacting Rivers Casino Pittsburgh's Ethics Hotline at (877) 566-8455 to report concerns.

WINNING PROGRAMS: DIVERSE SUPPLIERS AND VENDORS

The Purchasing Manager and the Director of Community Relations will share the responsibility for identifying and encouraging the participation of minority, disadvantaged, and women-owned business.

The Director of Community Relations/Procurement Manager 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 Pittsburgh will take the following actions:

- The Purchasing Department in collaboration with the Diversity Director/Task Force will develop a Supplier Diversity Council comprised of representatives from various functional areas who have decision-making authority. The SDC will meet quarterly to establish strategies, goals, and objectives to increase the percentage of supplier diversity spend in their respective areas.
- Rivers Casino Pittsburgh 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 Pittsburgh will "partner" with local organizations within the Greater Pittsburgh Metropolitan area.
- Rivers Casino Pittsburgh will provide a link on the company's website to assist local organizations within the Greater Pittsburgh Metropolitan, and will include itemized procurement needs and provide informational assistance, such as certification requirements and certification bodies, for all vendors.
- Rivers Casino Pittsburgh will make available on its website www.riverscasino.com/pittsburgh information describing procurement needs, processes and general contract information.

- Rivers Casino Pittsburgh 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 Pittsburgh purchasing personnel will track dollar volume and performance of suppliers and vendors and provide reports/data to the Diversity Director to monitor compliance with the Diversity and Inclusion Plan.
- Rivers Casino Pittsburgh through the Diversity Director will be collecting data and issuing reports needed for periodic diversity reporting, including quarterly participation reports as defined and required by PGCB.
- Rivers Casino Pittsburgh will be working with the Purchasing Manager/Diversity Director on the development of an MWBE network and the implementation of the Diversity and Inclusion Plan.
- Rivers Casino Pittsburgh purchasing personnel and internal end-users will be trained on supplier diversity policies and procedures and compliance requirements.

WINNERS NEVER QUIT: AUDIT AND REPORTING SYSTEM

At Rivers Casino Pittsburgh we knew that we were aiming high when we set Winning through Diversity as our goal. And we know that winners cannot sit back and hope to achieve their goals. Consequently, our plan for winning includes self-scrutiny because winning means always setting the bar higher.

Internal Progress Reports

The Director of Diversity and Task Force shall monitor company progress to carry out the Diversity and Inclusion Plan. The Director of Diversity/Task Force shall receive employment and procurement activity reports for each department and MWBE 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 and Inclusion 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 Pittsburgh shall file an annual 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; averages 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's 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.