



RIVERS CASINO PHILADELPHIA

Rivers Casino Philadelphia

Diversity Plan

Updated July 2026

Sugarhouse HSP

Gaming, L.P.

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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 “Inclusive Practices” 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 inclusive practices 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 are supported and celebrated, 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. By prioritizing workplace culture and team member experience, Rivers has established itself as a preferred employer of choice.*
- *Rivers recognizes the success of Minority, Women-Owned Businesses is essential to economic growth and vitality throughout the Greater Philadelphia region. Connecting with small and diverse businesses, collaborating with advocacy organizations and aligning with like-minded peer businesses adds tremendous value to our property and empowers those businesses to thrive.*
- *Philadelphia has a vibrant ecosystem full of rich history and distinct character and we pour back into communities throughout the city in a thoughtful manner. Aligning our efforts with the City’s primary areas for growth (Public safety, economic & workforce development and health & wellness,) serve as a guide for our support and resource allocation.*

Leadership

Rivers Casino Philadelphia is spearheading “Inclusive Practice” efforts, providing leadership, vision and counsel; strategic planning, research, training and professional development, communication and the implementation of a Diversity and Inclusion Strategic plan.

The strategic plan will have support from leadership and buy-in from different departments to ensure a holistic impact. Various Leadership teams will serve on the Rivers Casino Philadelphia’s Diversity Task Force and provide feedback to enhance our operations, communication, and engagement with our workforce.

Diversity Task Force

The Diversity Task Force ensures the company fulfills its workplace diversity and community support promises. The Director of Community and Business Development will serve as the Chief Diversity Officer.

Participants will include the Chief Diversity Officer, members of executive leadership, Finance, Human Resources, Compliance and Marketing.

Areas of focus will be as follow:

- Review quarterly and annual reports and document 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 (MWDDBE).
 - 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.

Team Member Diversity

To ensure the **Strategic Diversity and Inclusion Plan** is effectively integrated into workforce recruitment and retention, Rivers Casino Philadelphia will implement the following structured initiatives:

● **Recruitment & Outreach Strategies**

- Internal Alignment: Maintain transparent, continuous communication between Human Resources and management regarding open positions.
- Community-Based Sourcing: Distribute job openings to workforce development agencies and local organizations that serve under-resourced populations.
- Academic Partnerships: Share vacancy announcements across regional educational networks, including trade schools, community colleges, and universities.

● **Workplace Inclusion & Support Programs**

- ESL Integration: Partner with HR to identify English as a Second Language (ESL) candidates and employees while providing focused communication tools and resources.
- Equity Onboarding: Require new hires to attend orientation sessions hosted by

- HR or Senior Executives, highlighting why "Culture Counts at Rivers".
- Cultural Recognition: Host events, educational initiatives, and activities that celebrate recognized holidays and diverse heritage months.

● **Employee Retention & Advancement Incentives**

- Educational Scholarships: Offer financial assistance programs for team members, their children, and grandchildren to pursue higher education or trade programs.
- Performance Recognition: Implement dedicated programs to reward employees for excellent attendance, job performance, company loyalty, and overall enthusiasm.

Job Postings

All employment opportunities shall be publicized for a duration of no less than three (3) days via the Rivers Casino Philadelphia career portal and/or physical on-site locations. We post all job openings on both our internal employee portal and our external careers website.

Applicant Referral Process

- All applicants, internal and external, shall be referred to Human Resources.
- The Human Resources department shall evaluate and identify eligible internal candidates, subsequently routing them to the appropriate Department Managers for consideration.
- After a job is posted on the company website for at least three days, HR will find qualified external candidates and send them to Department Managers for interviews, while also coordinating college recruitment efforts

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 his or her 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 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:

Team Members are encouraged to immediately report any perceived violations of the Anti-Harassment and Anti-Discrimination policy to their department supervisor, manager, or any alternate member of management. In the event that a Team Member is uncertain where to direct their concern, or if a reported incident does not receive a satisfactory resolution within five (5) business days, the employee should promptly notify the Vice President of Human Resources or an HR Management representative. Alternatively, concerns may be reported via the Rivers Casino Ethics Hotline at (866) 934-2417.

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.

Diverse Suppliers and Vendors

The Vice President of Finance and the Director of Community and Business Development will jointly lead efforts to recruit and support minority- and women-owned business enterprises (MWBs). Together, they will promote diverse ownership and operation of businesses serving

and supplying our facility. We are committed to sourcing goods, products, and services from a diverse pool of competitive vendors who meet our high standards for quality, service, and price. Additionally, we encourage all primary suppliers to support these initiatives by utilizing second-tier diversity 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 and monitor compliance with the Diversity Plan.
- Rivers Casino Philadelphia will collect data and issue reports needed for periodic diversity reporting, including quarterly participation reports as defined and required by PGCB.
- The Vice President of Finance and Human Resources will continuously work on developing a MWDBE network and the implementation of the Diversity Plan along with the Director of Community and Business Development.
- Rivers Casino Philadelphia purchasing personnel and internal end-users are trained on supplier diversity policies and procedures and compliance requirements.

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.

Audit and Reporting System

Internal Progress Reports

The Director Community and Business Development along with the Task Force shall monitor company progress to carry out the Diversity and Inclusion Plan. The Director of Community and Business Development/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 Task Force for review and comments, which will assist department managers and supervisors and

project site managers in 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.
- 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.