

DIVERSITY PLAN FOR VALLEY VIEW DOWNS, LP



Submitted by:

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Appendix

Equal Employment Opportunity Policy

I. Introduction

Valley View Downs, LP (“VVD”) is a proposed harness racing track and slots casino in Lawrence County, Pennsylvania. The \$428 million project is expected to generate 1,500 construction jobs and 1,000 full-time and part-time property jobs. As a new entity in Pennsylvania, VVD aspires to be a community-oriented, inclusive corporate entity. To that end, VVD has established this Diversity Plan (“Plan”) to assure that all of its business policies and practices support and actively promote the central goal of equal opportunity in all aspects of employment, procurement, and community involvement. VVD specifically seeks to achieve the following objectives:

- Diversity in VVD’s workforce and business partners that reflect the communities in which VVD operates;
- Implementation of policies, procedures and systems that support and encourage the principles of diversity in a diverse work environment;
- Creation of a work environment that respects different cultures, capabilities, genders and ages and embraces diversity as a strength; and
- Improved community relations as a result of a commitment to diversity.

VVD will maintain and refine this Plan as we establish a proven track record of equal opportunity in all aspects of our operations, focusing initially on construction and progressing to workforce development and procurement. This Plan sets forth the principles and guidelines by which VVD will promote diversity in all facets of its operations.

At this juncture, in light of the fact that the track is not yet operational, this Plan is largely prospective and based on current assumptions of the casino’s future business and workforce. While this Plan refers frequently to “MBE” and “WBE” companies, the inclusive diversity philosophy of VVD will be more far reaching than simply the inclusion of minorities and women. Significantly, our philosophy is to also encourage the broader, more inclusive concept of diversity (as defined below), in order to maximize the diversity of our employment base and our suppliers (for instance, inclusion in areas such as other groups within our definition of diversity). This Plan will refer to this broader concept of inclusion by the designation “other diverse groups”.

II. Executive Summary

Policy Statement:

VVD believes that each employee is an integral part of its success and is committed to the principles of diversity and equal opportunity. All employment related decisions will be made without regard to race, gender, age, marital status, sexual orientation, religion, national origin, citizenship status, disability or any other protected status. This applies to recruitment, hiring, training, promotion and all other actions/conditions of employment such as compensation, benefits, reduction-in-force layoffs, reinstatements, training and disciplinary actions. All employees are assured an equal opportunity to make the maximum contribution to VVD and also to further their own career goals.

Strategy:

Our overall strategy will enable VVD to develop and implement effective Plan management that will drive achievement of positive business results and meet our twin goals of ensuring equal opportunity and promoting diversity in a manner that reflects and includes the local community. The four focus areas of the Plan are:

- Construction
 - Build relationships within the community to raise awareness and identify qualified contractors and suppliers.
 - Include qualified minority and women business enterprises, as well as other diverse groups, in the initial and post opening construction projects.
- Vendor Purchasing
 - Build relationships within the community to raise awareness and identify qualified vendors.
 - Ensure that all qualified vendors are given equal access to bid on our business.
- Employment
 - Build relationships within the community to raise awareness and identify potential candidates for employment.
 - Foster an inclusive work environment that results in both personal and business success.
- Community Involvement
 - Support our community and be responsible corporate citizens.

Diversity Committee:

Overseeing the implementation of this Diversity Plan will be a Diversity Committee comprised of executives and human resource personnel. The Diversity Committee may invite additional participation from other management-level personnel or associates, including women, racial/ethnic minorities and/or disabled persons and outside counsel.

Responsibility:

While the ultimate responsibility for this Diversity Plan rests with the General Manager of Gaming of VVD, successful implementation requires the concerted efforts of all management and staff accepting the tenets of this plan's philosophy as an integral part of their daily work routine. Adherence to the Diversity Plan is part of each employee's job description and, in varying degrees based on position, will be incorporated into their performance evaluations.

III. Definitions

Definition of Diversity:

Diversity refers to the variety of backgrounds and characteristics found in society today; thus, it embraces all aspects of human similarities and differences. While we support diversity as an inclusive concept, reality compels us to focus considerable attention to addressing issues related to those individuals and groups that have historically been adversely affected. As such, diversity specifically refers to differences among people with respect to age, sex, culture, race, ethnicity, religion, color, disability, national origin, ancestry, sexual orientation and veteran status.

Definition of Minority:

For purposes of MBEs, a minority is an individual who is a member of the following ethnic racial groups: African American, Asian American, Hispanic American, Native American.

For purposes of WBEs, a minority is an individual who is a female, regardless of race or ethnicity.

Definition of Participation Plan:

An obligation imposed by a licensed entity or applicant as part of its contract with a contractor that requires the contractor to perform the contract through the utilization of minority or women owned business enterprises.

Definition of Minority Business Enterprise (“MBE”) and Woman Business Enterprise (“WBE”):

Minority and female business enterprises that meet the guidelines set by the Pennsylvania Department of General Service Bureau of Minority and Women Business Opportunity, a list of which can be found at:

http://www.dgsweb.state.pa.us/imaginepa/bcabd/vendor_search.asp?bcabdRNavrad9F121=

IV. Construction

Construction Mission:

Inclusion of minority businesses and other diverse groups on major construction projects in western Pennsylvania is an important issue for the local minority community and for VVD. We believe that a proactive approach to addressing minority participation during the planning stages of the initial build out (as well as subsequent construction) will result in both successful inclusion of minority businesses and successful completion of the project.

Good Faith Plan For Minority Construction Participation:

VVD plans to contract with a construction manager who has experience with the local community and relationships with the minority and other diverse contractors and organizations and specialized staff to address the diversity issues. Our construction manager will also reach out to those minority organizations that we identify as leaders in western Pennsylvania and involve them in the planning stages of the minority participation program. This will ensure their participation and cooperation for the duration of the project.

These organizations can assist us in areas including:

- Development of a minority and diversity Participation Plan
- Development of workforce utilization program
- Solicitation of minority and other diverse contractors and vendors
- Monitoring and reporting of workforce utilization
- Solicitation of minority and other diverse contractors and vendors
- Compliance Reporting

The construction manager will work closely with VVD on all Participation Plan issues, as careful planning and management will be necessary to build strong business partnerships with the various organizations. For example, the bid packages will be developed with an eye towards creating viable opportunities for minority and other diverse contractors and suppliers.

The first step to building and continuing a positive relationship with the minority community will be to comprehensively identify qualified minority and other diverse contractors and suppliers. Following the identification phase, the bid packages will be developed and distributed in a manner that will maximize inclusion. Finally, the reporting process will be structured to ensure, to the extent possible, that our goals are being met and that the appropriate parties are accountable for those results. Through the Participation Plan and the involvement of the above-contemplated organizations, as well as cooperation from local trade organizations, our construction manager will maximize the diversity participation in the project.

Construction Goal:

Our primary objective is to select contractors and suppliers who have the experience and ability to complete the highest quality work within scheduled timeframe and pricing parameters. VVD and our construction manager will identify a number of minority and diverse contractors who can

provide quality services. Additionally, our construction manager will utilize the list of minority and woman business enterprises compiled by the Pennsylvania Gaming Control Board to identify additional certified MBEs and WBEs. Our goal is for our extensive efforts in identifying MBE, WBE and other diverse candidates to result in a construction projects that is staffed in a manner which: (a) maximizes MBE/WBE and other diverse participation, and (b) is reasonably reflective of and inclusive of the local community.

V. Vendor Purchasing

Purchasing Mission

VVD considers quality, service, reliability and price as the main components of any vendor relationship. Further, as a socially responsible organization, we pledge to partner wherever possible with certified Pennsylvania minority and woman vendors, as well as other diverse groups, to create a mutually beneficial business climate. Our goal is to ensure that all qualified vendors are given equal access to bid on our business.

Good Faith Plan For Minority Vendor Participation:

In support of our diverse vendor purchasing mission, we plan to:

- Utilize the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity business directory and database to locate minority and diverse vendors that offer relevant products and services.
- Link our website to the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity to facilitate awareness and to simplify the application process.
- Create a brief “How To Do Business With Valley View Downs” point of sale brochure to summarize our diverse vendor purchasing program.
- Participate in Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity development events such as seminars, trade shows and training sessions and reverse trade shows to expand awareness of our minority vendor purchasing program.
- Attend and support Pennsylvania regional minority business fairs organized by the Pennsylvania Gaming Association and the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity.
- Periodically review the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity list of approved vendors and meet to assure that new vendors will have sufficient access to the Purchasing Manager and the user departments.
- Provide access to the applications and contact information of the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity to uncertified potential vendors interested in becoming a certified supplier.
- Require user departments to work with the minority vendor database and reach out to those minority suppliers.

Purchasing Goal:

At this early stage, we have not yet identified our purchasing needs. However, our extensive efforts to identify and assist MBE/WBE vendors, as well as other diverse groups of potential vendors, should result in a roster of vendors that maximizes diversity and is reasonably reflective of and inclusive of the local community.

VI. Employment

Employment Mission:

VVD is committed to recruiting, developing and retaining the best employees regardless of race, color, religion, sex, age, disability, sexual orientation or national origin. Moreover, we strive to create a diverse work environment that fully capitalizes on the abilities, skills and potential of our employees.

Our company's goal is to create a workplace where diverse viewpoints among team members are integrated into every part of our work life. We will foster a cooperative work environment in which all associates are treated with respect and dignity and are encouraged to reach their full potential.

Affirmation of Equal Employment Opportunity Policy:

VVD affirms its commitment to and pledges its full support of equal employment opportunity for all persons, regardless of race, color, religion, sex, disability, national origin or any other protected group status as required by law. Our equal employment opportunity policy is attached as Appendix A.

Good Faith Plan For Equal Employment Opportunity:

VVD is developing a comprehensive plan covering the recruitment, development and retention of the work force. The Plan will be reflected in our internal policies, our training and development efforts as well as community partnerships.

- Recruitment

VVD will identify various community groups and organizations in Lawrence, Allegheny, Beaver, Butler, and Mercer Counties with which we can partner. Identifying unskilled workers and training partners will be a major focus of our recruitment efforts.

Recruiting efforts will involve job fairs, various community partnerships, which will include higher education, Chambers of Commerce, government agencies and targeted recruiting of minorities and other diverse groups in both new and existing gaming markets.

Our advertising for open positions will include a broad range of diverse media sources in the area around VVD that may include print, radio, television and internet.

- Training, Development and Retention Efforts

Our education and training efforts will have several areas of focus. VVD will open with specific pre-opening training for all employees, consisting of our EEO/recruiting practices, customer service standards, anti-harassment as well as diversity training designed to foster a welcoming environment for all diverse groups. In addition to this broad, property-wide training, we will provide departmental skill-related training for our new associates. This will allow employees to successfully integrate themselves into their new departments. Building

confidence in the ability to competently handle job duties and establishing an internal departmental support system will increase the chances of retaining new employees.

Recruiting and hiring our workforce is only one aspect of our training and development focus. We also plan on providing various mobility programs allowing our employees to grow and advance within the company. A program will be available for line level employees who aspire to management positions. Advanced management skill-related courses will be available for our supervisors and managers who aspire to advance and become more proficient in their current positions. VVD is committed to the development of all employees and programs are currently being developed through the succession planning process to ensure that our management teams are focused on development at all levels of the organization.

Employees want to stay with companies that provide development and mobility options. They are loyal to organizations that invest in their careers. We are committed to being that kind of company. We will publish and post all available positions to give employees the opportunity to apply for advancement opportunities or equal-level positions in other areas, thereby allowing them to broaden their skills. We are committed to making the promotion of our employees a first option for upward mobility.

Employment Goals:

While our employment plans are not yet finalized, VVD expects to hire 1000 full and part-time employees. VVD will strive to maintain a workforce that reasonably reflects the diverse elements of its community and surrounding areas. Despite the scarcity of managers with industry experience in the geographic area, VVD intends to seek the best possible diversity within our management ranks as well.

VII. Our Commitment

Reporting:

VVD will maintain a comprehensive report of the total number and value of all contracts that contain a Participation Plan and all subcontracts awarded to MBE/WBE under a Participation Plan. The report will also include a description of our efforts to monitor and enforce our Participation Plans.

The report will also detail the total number and value of all contracts issued, directly or indirectly, and provide a detailed report of all efforts made to do business with diverse vendors (successful and unsuccessful).

Additionally, the report will include employment data including the minority and women representation in the workforce in all job classifications, salary information, recruitment and training information, and retention and outreach efforts.

Contact Information:

For information relating to this Plan please contact:

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Appendix A

Equal Employment Opportunity

CENTAUR, INC. Equal Employment Opportunity Policy

It is the policy of CENTAUR, INC. to be an equal opportunity employer. CENTAUR, INC. is committed to the full participation of members of protected groups, creating a diverse workforce representative of the labor markets consistent with the provisions of Title VII of the Civil Rights Act of 1964, the Uniformed Services Employment and Reemployment Rights Act of 1994, the Vocational Rehabilitation Act of 1974, the Americans with Disabilities Act of 1990 and any other applicable federal, state or local laws.

This policy covers all aspects of the employment relationship, including but not limited to recruitment, hiring, assignment and duties, promotion, tenure, compensation, selection for training, and termination. In regard to education and training, it is CENTAUR, INC.'s policy that no person will be excluded from participation in, denied the benefits of, or subjected to discrimination in any educational or training program or activity on the basis of any protected classification. The policy applies to all units and governs employment of all employees of CENTAUR, INC.

All policy-making activities of CENTAUR, INC., including those associated with planning, policy, or advisory groups, shall be models of equal opportunity. Company programs and activities shall be conducted in a manner free of discrimination. The use of any company resources shall be undertaken in a nondiscriminatory manner. CENTAUR, INC. will include in all of its contracts provisions that the contractor/subcontractor will comply with the nondiscrimination provisions of federal and state civil rights laws as a condition of doing business with CENTAUR, INC.

CENTAUR, INC. recognizes that disparate impact on the basis of race, color, sex/gender, religion, age, national origin, sexual orientation and disability are inherently suspect and that disparate treatment on any such basis is intolerable discrimination. It is the policy of CENTAUR, INC. to identify employment practices or activities which, though neutral in form, have adverse effects on members of protected groups. Such practices that cannot be justified on the basis of business necessity (not merely business convenience) will be eliminated.