

MOUNT AIRY  
CASINO  
RESORT 2023  
DIVERSITY  
PLAN



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## I. Diversity Policy Mission Statement

It is the policy of Mount Airy #1, L.L.C. d/b/a Mount Airy Casino Resort ("Mount Airy") to foster and promote an appreciation for the unique values of different individuals and to allow team members to realize, grow and develop their potential to reach their personal goals, while recognizing the goals of Mount Airy. Our goal is to apply these same ideals in our interactions with customers, guests, vendors, consultants, and the communities in which we work and live. In order to apply these ideals to others:

- Each team member shall treat others with respect and dignity;
- Safety and cleanliness are key elements in promoting a diverse and sustainable culture;
- All Mount Airy policies and procedures shall support and encourage diversity goals;
- Mount Airy shall create and support an environment in which each team member shall have the opportunity to maximize their abilities and level of expertise.

## II. Diversity Plan Overview

### A. Scope

Mount Airy is committed to a policy of operating its Casino Resort entertainment complex in a manner that achieves the following goals:

- A capable staff of team members that represents the diverse groups of the Commonwealth of Pennsylvania, particularly those within the Greater Northeastern Pennsylvania market;
- A group of contractors, subcontractors, vendors and suppliers that continues to achieve representation from the Commonwealth of Pennsylvania, particularly the Greater Northeastern Pennsylvania metropolitan market, so that we ensure a balanced representation of minority and women owned businesses;
- A marketing effort that targets prospective customers from all ethnicities in the Greater Northeastern Pennsylvania market.

Mount Airy promotes diversity and assures that all persons receive an equal opportunity in employment. The promotion of diversity extends to contractors, subcontractors, assignees, lessees, agents, vendors and suppliers. Mount Airy assures equal employment opportunity for all persons, regardless of race, color, religion, gender, age, national origin, sexual orientation, citizenship status, or disability and is committed to:

- Taking proactive steps in addressing the issue of diversity communicating with team members, patrons, and the community regarding diversity;
- Actively soliciting a diverse group of team members, contractors, subcontractors, assignees, lessees, agents, vendors, and suppliers;
- Developing and instituting practical strategies to ensure the diversity Mission Statement.

Mount Airy is dedicated to maintaining an organization that reflects a fundamental respect for different ways of working and living. We allow every individual the opportunity to reach their potential.

Mount Airy is committed to being proactive in promoting diversity throughout all aspects of its operations. We believe that all team members are responsible for contributing to a work environment free from discrimination and prejudice, regardless of position or title. Mount Airy disseminates its Mission Statement externally by:

- Distribution of the Mission Statement to all team members of Mount Airy via the *Employee Information Guide*;
- Making new team members aware of the existence of the Mission Statement through new hire orientation;
- Inclusion of diversity materials in Mount Airy's *Employee Information Guide*.
- Through the inclusion of provisions prohibiting discriminatory practices in all purchase agreements, leases and contracts;
- Through the posting of the Mission Statement on Mount Airy's website.

## B. Components of Mount Airy's Plan

Mount Airy's Diversity Plan is comprised of the following components:

- Diversity Committee
- Recruitment & Employment
- Diversity Awareness Training Program
- Vendors & Suppliers
- Procurement & Construction
- Marketing & Entertainment
- Community Involvement
- Continuous Improvement and Industry Best Practice

### 1. Diversity Committee

Mount Airy has established a Diversity Committee under the direction of the Vice President of Human Resources (Diversity Officer). The Diversity Committee is comprised of Mount Airy's Vice President of HR and various departmental leadership at the Vice President, Director, Manager/Shift Manager levels. Department leadership team members are subject to change.

- The Diversity Committee was formed to join like-minded group of leaders of Mount Airy to work together on promoting a diverse, inclusive and equitable work environment represented within our team member demographics.
- The committee monitors and reviews the progress and results of Mount Airy's diversity program. All segments of the program, including recruiting and training of team members are reviewed, along with the evaluation of the contractor, supplier and vendor initiatives. The committee meets on a regular, quarterly basis, and makes recommendations to upper-level management.
  - The Diversity Committee conducts quarterly reviews to ensure compliance with all aspects of Mount Airy's diversity program. The review will assess the overall effectiveness of the program, centered on the diversity of team members, contractors, vendors, and suppliers.

- Mount Airy's Diversity Officer provides counseling to team members regarding appeal rights and options, problems, complaints, and discrimination issues. Mount Airy's Diversity Officer investigates complaints that involve allegations of discrimination based on race, color, religious creed, age, sex, ancestry, union membership, sexual orientation, national origin, AIDS or HIV status, general identity or expression, or non-job-related disability.

## 2. Recruitment & Employment

Mount Airy is committed to recruiting, retaining, and developing the best talent regardless of race, color, religion, sex, age, disability or national origin. Mount Airy complies with the Equal Employment Opportunity Act and will adopt policies consistent with the Act that apply to all employment practices including recruitment, hiring, evaluation, promotion, transfer, discipline, and termination, as well as forms of employee compensation.

Recruiting tools that are utilized to help ensure a diverse workforce include classified advertising in targeted newspapers, attending off-site and hosting on-site job fairs, posting job listings on the internet/social media/job boards, working with local organizations and chambers of commerce, and listing job openings with local and state agencies. Mount Airy also utilizes niche publications that reach out to a broad spectrum of cultures to advertise our job opportunities. Mount Airy has also implemented online networking to its fullest extent in order to attract the highest level of candidates. Mount Airy has identified civic groups and community organizations that represent diverse constituencies to help promote the message of our employment opportunities. In order to maximize diverse recruitment, Mount Airy also does the following:

- Recruit in different languages so that we do a responsible job of promoting our employment opportunities to those persons who speak English as a second language;
- We will identify those local organizations that train and help secure employment for persons with disabilities;
- Job descriptions are carefully written to not include restrictive and unnecessary minimum requirements that might restrict our ability to employ minorities and the disabled;
- Provide training and development to our premier performers so that excellent team members who are either women or minorities can be qualified to assume positions of management responsibility.

## 3. Diversity Awareness Training Program

The objective of Mount Airy's diversity awareness training program is to employ a staff that is cognizant of the needs of its fellow team members and also the diverse customer base that patronizes Mount Airy; Mount Airy's training efforts are designed to ensure that all team members are aware of diversity issues and have an understanding of changes in the workplace. In order to provide the very best customer service, it is necessary for Mount Airy's employees to understand the importance and appreciation of individual differences, so that stereotypes and prejudices may be overcome. Mount Airy has a zero-tolerance policy towards discrimination of women, minorities and persons with disabilities. All Mount

Airy team members are required to complete the diversity awareness training program during employee onboarding and/or new hire orientation.

#### 4. Vendors & Suppliers

The Director of Purchasing, in conjunction with the Diversity Officer make every effort to reach out to qualified minority and women owned vendors who are able to provide the products and services necessary to meet the operational needs of Mount Airy.

Mount Airy's procurement department continues to pursue WMBE opportunities whenever possible. The department attempts to reach out to such MWBE vendors and/or community organizations that support such vendors like the Monroe County Chambers of Commerce and other various community organizations.

Mount Airy also uses the Commonwealth's list of certified minority and women owned vendors as a resource to finding and contracting with such vendors. Further, Mount Airy endeavors to hire vendors and suppliers, etc. that maintain a diverse workforce and implement a diversity plan.

Additionally, its efforts include:

- Active measures on the part of Mount Airy's Director of Purchasing to solicit and secure services with qualified minority and woman owned vendors;
- Networking with chambers of commerce and civic organizations to help recruit qualified vendors;
- Utilizing niche media to help attract qualified vendors;
- Utilizing public information that lists businesses owned by women and minorities.

Mount Airy attended the Supplier Diversity Fair to build relationships with new suppliers in the NEPA region.

#### 5. Procurement & Construction

Mount Airy requests proposals in order to receive and select from a wide range of bidders for each of its major contracts, Mount Airy seeks to identify a diverse group of potential vendors and suppliers. Certified minority-owned, women-owned, disabled and small business enterprises will be encouraged to support diversity efforts through both first and second-tier supplier programs.

#### 6. Marketing & Entertainment

Mount Airy markets to attract minorities and niche groups. Such efforts will include:

- Advertising in targeted publications;
- A diverse program of onsite performers to appeal to a variety of groups;
- Targeted Special Events.

## 7. Community Involvement

Mount Airy ensures that diversity is respected, encouraged, and embraced throughout its organization, and strives to promote the same throughout its community. Mount Airy has developed relationships with local community organizations such as the United Way, various chambers of commerce, and other organizations representing minority constituents, and uses the internet and advertising opportunities to promote diversity efforts.

## 8. Continuous Improvement & Industry Best Practices

Mount Airy continuously looks for ways to improve existing operations and to ensure that industry best practices are employed whenever possible.

# III. Implementation of Diversity Plan

## A. Corporate Level Responsibility

The Pennsylvania Gaming Act requires that a corporate manager be appointed for diversity activities. Mount Airy's corporate manager for diversity activities will be Mount Airy's Vice President of Human Resources. In this capacity, the Vice President of Human Resources is responsible for supervising the staff within the Human Resources Department and the staff who work with departmental management to coordinate diversity activities.

The appointed corporate manager for diversity activities responsibilities include but are not limited to:

- Coordination of the Diversity Plan and creation of standard goals and criteria to meet the requirements of the Pennsylvania Gaming Act and its regulations;
- Advising and directing management employees on all requirements of the Diversity Plan;
- Serving as the primary contact with the Pennsylvania Gaming Control Board and any other governmental officers, as well as other organizations which benefit minorities;
- Reviewing the various diversity activities and functions to assure conformity with corporate policy as to diversity;
- Review and recommend improved practices which advance the objectives of the Diversity Plan on an as-needed basis.

## B. Management Level Responsibility

The Chief Operating Officer and General Manager of Mount Airy has the ultimate responsibility for compliance with the Gaming Act and Gaming Control Board regulations. However, to fully realize diversity, management employees must also implement equal employment and diversity policies at the departmental levels and their duties include the following:

- Compliance with both the letter and the spirit of the diversity policy;
- Educating all management team members of the diversity policy and how to implement the policy in employee relations;

- Ensuring that all team members comply with the diversity policy;
- Promptly and effectively addressing any efforts to avoid or impede compliance with the diversity policy;
- Maintaining any necessary documents, data and/or information related to implementation, compliance and enforcement of the diversity policy;
- Establishing, maintaining and auditing systems that will measure effectiveness, achieving objectives and compliance with state and federal requirements;
- Keeping abreast of all federal, state and local laws and regulations affecting the diversity policy;
- Keeping Mount Airy management informed of any issues and/or problems related to the implementation and execution of the diversity policy;
- Developing and implementing training programs on an as-needed basis.

### C. Employee Level Responsibility

Recognizing that achievement of diversity involves every level of employment; all team members' duties include the following:

- Compliance with both the letter and the spirit of Mount Airy's diversity policy;
- Keeping the corporate manager informed of any issues and/or problems related to the implementation and execution of the diversity policy, and
- Participating in training programs.

### D. Conclusion

Mount Airy takes the issue of diversity in its workforce, hiring and business practices very seriously and works every day to run the type of facility which embraces the principles and practices set forth in this plan. To do so is integral to a successful operation. The foregoing plan serves as our template to meet our diversity goal. We are dedicated to continued success in this regard.