



# Diversity & Inclusion Plan Valley Forge Casino Resort

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## **I. Diversity Vision & Mission**

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Valley Forge Casino Resort ("VFCR") values its team members and business partners as integral keys to its continuing success. To that end, VFCR has established this Diversity & Inclusion 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, contracting and community involvement.

VFCR is pleased to continue to build upon a robust diversity and inclusion initiative already begun by Boyd Gaming. This vision and mission is best described in our common Company mission and commitment to diversity and inclusion.

### Company Diversity & Inclusion Mission

Boyd Gaming is a leading diversified owner and operator of casino entertainment properties. We embrace diversity in every aspect of our business, from our team members, to our supply chain initiatives, to our philanthropic endeavors, and our customers. Our commitment to diversity strengthens our company, our communities, and our families.

### Commitment to Diversity & Inclusion

At Boyd Gaming Corporation, Diversity & Inclusion has been a core part of our identity and culture from the day we were founded.

As a Company, our goal is to attract and retain individuals that reflect the full diversity of the communities where we do business, to develop inclusive policies and practices that help our team members realize their potential, and to create goodwill with our team members, neighborhoods and customers.

While our commitment begins with our team members, it certainly does not end there. We seek to promote greater acceptance in our business and community relationships as well, broadening opportunities to reach persons of every background.



Diversity & Inclusion is an integral part of our business strategy. Boyd Gaming understand its importance and the key roles each of us must play in helping continue to create an environment in which customers of every race, ethnicity, creed, generation, gender and sexual identity feel welcome.

By promoting a diverse and inclusive workforce, we better understand each customer's unique wants and expectations – and become a much stronger Company.

#### Boyd Gaming Diversity Council Perspective

We are proud of our long-standing reputation as a champion of diversity & inclusion and it would not be possible without everyone's support. Together we have embraced diversity as a core concept of our Company's philosophy and as we grow our initiatives will continue to evolve.

We all come in different shapes, sizes, ages, races, genders, background, etc. Therefore, it is important for us to know how to work productively with others who are different. Our customers expect it, and our Company success depends on it.

We believe that when combined, our individual uniqueness strengthens us. We manage by inclusion by having team members closely tied to the way we conduct our business. We believe in and encourage input, views, and ideas of all team members. We do this by asking for participation in many areas such as: focus groups, roundtables with senior management, and yearly opinion surveys.

Our commitment to diversity & inclusion requires every team member's participation. Together, we'll build a stronger Company – and create a bright future for every Boyd Gaming team member. Our overarching diversity goals include:

- Hire and retain a diverse and inclusive workforce.
- Ensure team members are trained in diversity. Understand the importance of diversity through education and other initiatives.



- Provide minority-owned, women-owned and other disability-owned suppliers bidding opportunities where they can successfully meet the Company's requirements.

## **II. Leadership Responsibilities for Diversity & Inclusion**

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### General Manager Responsibilities

The General Manager is accountable for ensuring that the appropriate diversity & inclusion activities are being executed and documented. Through the property's Diversity Committee, the GM is responsible for the ratification of all diversity & inclusion action plans at their properties and for the work being done by their departments in support of their agreed upon diversity goals. The GM is responsible for understanding and for being champions on all diversity related activities and should include diversity commitments in their goals. In addition, they are also responsible for providing all resources necessary to execute the diversity and inclusion plan.

### VP of People & Culture Responsibilities

The VP of People & Culture acts as the Equal Opportunity Officer for the property and champions diversity & inclusion related efforts to ensure they are developed and leveraged across all Departments to achieve an inclusive approach to Diversity. In addition, the VP monitors adherence, consistency and value of all diversity efforts to ensure Company and property goals are being met. The VP of P&C is responsible for reporting property diversity statistics on a regular basis and ensuring committee obligations and objectives are obtained.

### Senior Property Leader Responsibilities

Directors and other Senior Leaders are responsible for ensuring appropriate diversity & inclusion activities are occurring and resources are provided as reasonably requested. They are required to ensure diversity related efforts are



transpiring within their departments consistent with Boyd Style and the Company's commitment to diversity & inclusion. All work performed by them should be in collaboration with the GM lead.

#### Procurement Responsibilities

The Company has committed to certain procurement goals for purchasing from certified minority-owned, women-owned and disabled-owned business enterprises. Property team members that engage in procurement activity will be knowledgeable of diversity requirements and support inclusion with identifying diverse vendors in the bid process.

#### **Property Diversity Committee**

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A VFCR Property Diversity Committee will be established. The following considerations and criteria will be examined when developing the committee:

##### Composition of the Committee

- May include:
  - Property Leadership and representatives from all departments.
  - Representation of female, male, minority, salary and hourly committee members.
  - Committee Lead will evaluate the benefits of self-imposed term limits annually and consider what may be appropriate.
  - The Corporate Diversity Council will periodically review property committee composition and make recommendations around composition if any concerns arise.



### Creation of D&I Action Plans & Goals

The overall D&I Plan will contain tactical approaches to executing deliverables along with timelines. Each goal is to have its own set of actions.

- A hiring plan with an “as is” status and efforts for achieving results.
  - The plan may include the identification of diversity recruiting opportunities, track recruiting outcomes, track relevant diversity events including diversity job fairs, networking events, and supplier events and matchmakers.
  - The plan may also identify community organizations within the local community that can assist and support D&I employment initiatives.
- Corporate Procurement and Supply Chain Department may generate a list of current and future projects for bid opportunities.
- Participation in enterprise-wide D&I training initiatives.
- Available resources to include and not limited to: Director of Diversity, Corporate Diversity Council Property Liaison, local diversity certifying organizations and agencies, ethnic Chambers of Commerce, and professional organizations specializing in D&I concepts.



### III. Diversity and Inclusion Employment Practices

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#### Fair Treatment Policy

Establishes VFCR's procedures for providing team members with the opportunity to raise complaints, report problems and openly discuss matters relating to employment to management. Managers are expected to treat all team members in a respectful manner and provide an environment where growth and development is achievable for all team members.

#### Fair Treatment Commitment

VFCR is committed to providing the best possible climate for development and goal achievement for all team members. We seek to develop a spirit of teamwork; individuals working together to attain a common goal.

VFCR believes in the principles of respect and equal opportunity for our professional and individual growth and development. We seek to do everything we can to make certain that we are providing competitive pay and benefits, including health insurance, paid time off and training opportunities to match programs with people and skills similar to yours. We actively seek and respond to team member opinions on all aspects of their jobs. We value team members from various backgrounds and approach issues and problems from different perspectives.

In order to maintain a culture where these goals can be accomplished, the Company provides a comfortable and progressive workplace. Most importantly, our standard is to create and endorse a workplace where communication is open and problems can be discussed and resolved in a mutually respectful atmosphere.

- We believe we can solve issues together.
- We take pride in our problem solving process, we urge team members to use our open door policy if they feel there is a problem. All team members may bring any





concerns, issues or suggestions to their supervisor, the Office of People & Culture or any other member of management.

- We firmly believe that through direct communication, we can continue to resolve any difficulties that may arise and develop a mutually beneficial relationship.
- All managers have the responsibility to ensure that VFCD's policy of Fair Treatment and a culture of respect are implemented throughout the organization.

VFCD's policy is to treat each team member fairly and consistently. We practice a non-retaliation policy which protects team members from retribution for expressing a problem, concern, issue or suggestion.

#### Open Door Policy

Valley Forge Casino Resort practices an Open Door Policy which provides for the timely resolution of team member problems, misunderstandings, and complaints while allowing sufficient time for fact finding and clarification. No team member will be reprimanded, harassed, or retaliated against for utilizing the Company's Open Door Policy.

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

If a team member has employment-related concerns or questions, they are encouraged to discuss them with their supervisor. If the team member believes that such a conversation would not be productive, or if they have attempted to address the concern directly with their supervisor and the situation remains unresolved, the team member may contact their department manager, a member of People & Culture or another appropriate member of management.



The manager or People & Culture professional will assist the team member as reasonable and appropriate to seek resolution to their concern. In reviewing the matter, the team member may be asked to meet with their supervisor, department manager or other member of management, review and provide explanation to relevant facts and documents, or any other measures necessary for a full understanding of the situation.

Under no circumstances will a team member be penalized or retaliated against for presenting a good-faith complaint to their supervisor or to members of management.

#### Appeal Process

Should a team member feel that their issue was not resolved fairly or in accordance with our Open Door practices, they may appeal the decision? Such appeals are to be made in writing, within seven (7) business days.

Team members who have completed their introductory period in their current position (90 days) may request an Appeal of certain disciplinary actions if they feel job-related performance issues have not been resolved through the department supervisor, manager, director or People & Culture department. A team member may request an Appeal for several performance decisions, including:

- Written Warning
- Final Written Warning
- Separation

The Property handbook outlines specific circumstances when a request for an appeal may be denied including but not limited to arrests, indictment of crime or revocation of a required license.



The Appeal Panel is made up of three impartial members as follows:

1. A team member participant from the team member's department.
2. A management level participant having no supervisory authority over the team member's department.
3. A People & Culture professional who has not been involved in the team member's issue.

The decision is made on the basis of facts and evidence presented to the Appeal Panel.

The Appeal Panel can make one of the following decisions:

- Uphold the discipline
- Modify the discipline
- Overturn the discipline

Under no circumstances will a team member be penalized or retaliated against for presenting a good-faith complaint to the supervisor or to members of management.

#### Anti-Harassment Policy

Establishes VFCR's policy and commitment to provide a work environment that is free from all forms of harassment, intimidation or retaliation for opposing such conduct. VFCR will comply with all applicable federal/state and local laws relating to harassment in the workplace.

As part of its policy to comply with all applicable EEO laws, VFCR prohibits harassment on the basis of sex (with or without sexual conduct), race, color, religious creed, national origin, age, citizenship, pregnancy, childbirth or related medical condition, physical or mental disability, sexual orientation, service in the uniformed armed forces, genetic information, or other characteristic covered by applicable state or local EEO law.



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

Verbal, physical or sexual harassment can occur between men and women, members of the same sex, team members, and or vendors of VFCR. Sexual harassment is unacceptable in the workplace itself and at other work-related settings such as business trips and business-related social events on and off property.

Complaint Procedure:

Discrimination or harassment will not be tolerated by team members, supervisors, managers, or non-team members who conduct business with the Company. It is the responsibility of every team member and person providing services to the Company



under contract, to ensure that harassment of any of these unpermitted bases does not occur.

The Company supports and encourages reporting of all incidents of harassment, regardless of whom the offender may be, and will promptly investigate all reported incidents. To the fullest extent practicable, the Company will keep complaints and the terms of the resolution confidential. To this end, parties involved in an allegation of harassment may be asked to sign a confidentiality agreement during the course of the investigation. Where the alleged offender is not an employee, the Company's management, in consultation with the complainant, will review the complaint and make every effort to identify a reasonable remedy with the parties involved.

All Company team members are responsible to help ensure that we avoid all types of harassment. Any team member who believes they are the subject of harassment or discrimination on the bases enumerated above or has observed harassment or discrimination or believes they observed should immediately contact, verbally or in writing, in confidence their supervisor/manager or People & Culture professional. If the incident happens to involve the team member's supervisor/manager, or the team member would prefer not to report the incident to his or her supervisor/manager, the incident should be reported to the Director of Culture & Engagement. Every effort will be taken to promptly and thoroughly investigate any allegation of harassment or discrimination in as confidential a manner as possible. Team members who learn of a complaint or investigation, or who are interviewed as part of an investigation are to refrain from casual discussions with others, who have no business to know the facts or circumstances of a complaint or investigation. Team members should take care not to participate in the spread of gossip or rumors, which is never constructive, and merely distract and disrupt team members from work. Any team member who knowingly communicates false or misleading information, whether in the course of an investigation or otherwise, or who interferes with or undermines an investigation, will be subject to discipline. In all cases, the team member who registered the complaint



will be apprised of relevant findings and conclusions. The Company will promptly take any applicable corrective action.

If a team member is not satisfied with the handling of a complaint or action taken by the investigator, the team member should bring complaint to the attention of the President/CEO.

No manager is authorized to agree to “do nothing” or to keep confidential any complaint, report or concern regarding possible discrimination or harassment. Any manager, who learns of such conduct, whether or not such employee is under his or her supervision, must promptly contact the People & Culture department.

Where a hostile work environment has been found to exist, VFCR will take all reasonable steps to eliminate the conduct creating such an environment.

If an investigation results in a finding that the complainant falsely accused another of harassment knowingly or in a malicious manner, the complainant will be subject to appropriate disciplinary action up to and including termination of the employment relationship.

If you should have any questions about this policy, or the procedure for filing complaints, please contact any member of management or the People & Culture Office.

#### Retaliation is Prohibited

The Company will not tolerate retaliation against any team member for raising, in good faith, a complaint or concern about discrimination or harassment; for opposing conduct or practice such employee believes is good faith to be harassment or discrimination; for assisting another team member report harassment or discrimination; or filing a good faith complaint of discrimination or harassment with a government agency or contact.



Any team member who believes they have been subjected to retaliation or observes conduct, they in good faith, believes to be retaliatory should report the situation to the VP of People & Culture or relevant People & Culture Representative. Retaliation will result in discipline, up to and including termination.

#### **IV. Recruitment & Employment Programs**

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VFCR has instituted initiatives to achieve specific diversity action goals. These initiatives include:

- Training programs to enhance the knowledge and understanding of the value of a diverse workforce and a company culture of equality;
- Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
- Making job descriptions available to recruiting sources and all members of management involved in the recruiting, screening, selection and promotion processes;
- Evaluating the total selection process to ensure freedom of bias through:
  - Reviewing employment-related documents to include job applications, pre-employment inquiries to ensure information requested is job related;
  - Evaluating recruiting and selection methods to assure they target minority broad range of prospective applicants; and
  - Training management staff on proper interview techniques.
- Using techniques to improve recruitment and increase the flow of minority and female applicants, VFCR presently undertakes the following actions:



- Include the phrase "Equal Opportunity Employer" in printed employment advertisements;
  - Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
  - Encourage all team members to refer qualified applicants and reward successful placements;
  - Actively recruit at community organizations, educational institutes which attract minority or female individuals; and
  - Request community employment agencies to refer qualified minorities and women.
- Ensure that all team members are given equal opportunity for promotion. This is achieved by:
    - Posting promotion and employment opportunities internally; and
    - Offering counseling to assist team members in identifying promotional opportunities, training and educational programs to enhance opportunities for career growth.
  - Monitor and evaluate diversity by department to gauge progress toward goals.

## **V. Business Opportunities & Supplier Diversity**

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Participation in the numerous business opportunities arising from VF CR operations should be available to a broad spectrum of potential business partners, to include minority, women, a disabled-owned business (MBE/WBE/DBE) and most particularly, those certified as such by the Commonwealth of Pennsylvania. Efforts to achieve and maintain such procurement and contracting participation shall include the following:





### Governance

The Vice President of Finance with support from the Manager of Purchasing is responsible for the development and implementation of the Diversity in Contracting Program including:

- Awareness
  - Ensuring awareness of the Diversity Plan goals through internal and external advertising and notices, as detailed below; and
  - Advertising in media targeted towards MBE/WBE/DBE.
  
- Solicitation
  - Including notice of the Diversity Plan objectives in all contracts and request for proposals;
  - Coordinating solicitation efforts with appropriate governmental agencies assisting MBE/WBE/DBE;
  - Promote nondiscriminatory practices relating to vendor/contractor selection and promotions; and
  - Monitor and evaluate diversity by business partnership to gauge progress toward goals.
  
- Outreach
  - Attending/hosting vendor fairs to meet potential vendors and contractors and educate them on business needs and processes;
  - Promote awareness of business opportunities to various businesses and community groups, including minority MBE/WBE/DBE-oriented business organizations; and
  - Promoting and assessing contractors' diversity efforts.



## **VI. Communication**

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Awareness of the Diversity & Inclusion Plan and the Company's efforts related thereto is a crucial component to the effectiveness of such efforts. Management, staff, associates, vendors, contractors and the general public all benefit from being informed of the D&I Plan objectives and procedures. Dissemination of information regarding the Plan shall include the following:

- Internal Communications
  - Inclusion of our Equal Employment Opportunity and Reasonable Accommodation statement in the Employee Handbook;
  - Inclusion of our zero-tolerance policies for harassment, discrimination, bullying and other actions which oppose our goal for a diverse workforce;
  - Postings in suitable areas for employee communication;
  - Diversity training programs for all team members
- External Communications
  - Advertising in employment and business sections of appropriate types of media;
  - Participating in employment and business notification programs of the PA Gaming Control Board; and
  - Distribution of literature to organizations actively supportive of minorities, women and disabled persons and MBE/WBE/DBE.

## **VII. Internal Audit and Reporting System**

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The Vice President of People & Culture in partnership with the Vice President of Finance (contracting and procurement) 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 VFCR's internal audit process:

- An applicant information report showing relative information for qualified candidates;
- Summary data of external job offers, hires, promotions, resignations, termination and layoffs/reductions;
- Completion of EEO-1 reporting;
- Utilization and recording of Voluntary Self-Identification Forms;
- Evaluation of employee relations incidents to include terminations and grievances;
- Maintain statistics on vendor/contractor business volumes with MBE/WBE/DBE and changes over time;
- Maintain statistics on contacts with outside organization in furtherance of diversity outreach efforts;
- File quarterly and annual reports on Diversity Plan compliance with the PA Gaming Control Board and other appropriate regulatory agencies.