



WIND CREEK[®]
BETHLEHEM

2022 ANNUAL DIVERSITY PLAN

Table of Contents

| | |
|---|-------|
| INTRODUCTION | 3 |
| WIND CREEK BETHLEHEM | 3-4 |
| MISSION STATEMENT | 4-5 |
| GOALS..... | 5-6 |
| DIVERSITY IN EMPLOYMENT..... | 6-7 |
| RECRUITMENT..... | 7-9 |
| ADVERTISING..... | 7-8 |
| WEBSITE..... | 8 |
| SATELLITE RECRUITMENT CENTERS..... | 8 |
| JOB FAIRS..... | 8-9 |
| PARTNERSHIP WITH NON PROFIT ORGANIZATIONS FOR THE DISABLED..... | 9 |
| SOCIAL MEDIA AND OTHER SYSTEM DRIVEN METHODS..... | 9 |
| HIRING PROCESS..... | 9-10 |
| TRAINING..... | 10-12 |
| TEAM MEMBER RELATIONS..... | 12-13 |
| CONTRIBUTIONS TO THE LOCAL COMMUNITY..... | 13-14 |
| GENERAL PROCUREMENT | 14-16 |
| CONSTRUCTION PROCUREMENT | 16-17 |
| CONCLUSION | 17 |

CO

I. INTRODUCTION

The Wind Creek Bethlehem LLC (WCB) Diversity Plan has its genesis in the Diversity Plan of its parent corporation, the Poarch Band of Creek Indians (“PCI Gaming”) where there is a culture that embraces the diversity of all employees (Team Members). Wind Creek Bethlehem endeavors to create a culture of inclusion and commitment to equal opportunity for people of all races, color, religion, gender, age, sexual orientation, national origin, physical or mental handicap or disability and in which all aspects of diversity are acknowledged and respected.

II. WIND CREEK BETHLEHEM

Wind Creek Bethlehem is situated on the site of the historic Bethlehem Steel plant in Bethlehem, Pennsylvania, and located approximately 60 minutes from Philadelphia and the northern New Jersey suburbs, and 90 minutes from New York City.

The Sands Bethlehem opened in May 2009 with 3,000 state of the art slot machines as electronic table games. Two hundred and fifty slot machines and electronic table games were added in November 2009. The Electronic table games were eliminated in 2010 once Table Games were opened on the Casino floor. On December 31, 2016 there were 3,013 slot machines on the casino floor.

As a result of Table Games legislation approved in January 2010, the Sands opened its Table Games operation in July 2010 with 12 poker tables and 68 table games. In December 2010, Sands expanded its Poker Room with an additional 11 poker tables. In July 2011, Sands added the high-end gaming area, Paiza, and expanded table games to 129 games inclusive of poker. In August 2012, the Sands added 23 more table games for a total of 152 table games for 2012. In January 2013, 32 table games were added for a total of 184 and in the 2014 table games expansion, the total number of table games were increased to 207. This number remained the same in 2015 as well as 2016. In 2016, Sands added 30 Electronic Table Games with stadium seating.

Wind Creek Bethlehem offers a variety of entertainment and dining options including:

- Emeril’s Chop House (Emeril Lagasse steakhouse)
- Burgers and More by Emeril (gourmet burger restaurant by Emeril Lagasse)
- Coil (casino lounge with tabletop video poker)

- Molten Lounge (live entertainment lounge)
- Buddy V Italian Restaurant
- Emeril's Fish House
- The Market – Gourmet Express (food court)
- Steelworks (24-hour casino café with buffet)
- Wind Creek Event Center
- Wind Creek Outlet Retail Mall
- In May 2011, the Sands opened its 302 room Hotel including two (2) meeting rooms.
- In May 2012, the Sands added 3 more meeting rooms.
- In November 2011, the Shoppes at Sands Premium Outlet Retail Mall opened with six (6) out of a total of thirty-one (31) stores. Additional stores were leased in 2012 and 2013. By year end 2014, 28 of the available 29 spaces were leased. In 2015 there was movement in the rental of the units and currently 27 of the available 29 spaces are leased.
- In May 2012, Sands opened the Sands Event Center.
- In 2013, there were 2 Table Games expansions taking the total Table Games to 184.
- In 2014, there was an additional Table Games expansion increasing the total number of Table Games to 207.
- In 2015, the Sands closed the Saint James Gate restaurant in preparation for the opening of Buddy V Ristorante in spring 2016. Buddy V is an Italian Restaurant concept with Buddy Valestro, "The Cake Boss".
- In 2016, Sands opened Buddy V Italian Ristorante and changed the concept for the Emeril's Italian Restaurant to Emeril's Fish House. Infusion Lounge was closed to make room for stadium seating electronic table games. Additionally, in 2016 the entire hotel was refurbished including adding a Concierge floor on the 15th floor with butler service and 6 high end suites.
- In 2017, Sands Bethlehem introduced additional stadium seating electronic table games. Also, in 2017, Sands closed both Fish House and Chop House restaurants for renovations. Sands HR successfully placed all Team Members into temporary positions until the renovations were completed, avoiding any layoffs.
- In 2018, Sands Bethlehem closed Carnegie Deli. In its place, a brand-new Poker Room was constructed.
- In 2019, the change of control joint petition was approved by the Pennsylvania Gaming Control Board and Sands Bethworks Gaming LLC was sold to Wind Creek Hospitality (PCI Gaming) effective May 31, 2019.
- In 2020, the property was forced to close for a period of time between March and June as a result of the COVID-19 pandemic. Buddy V Ristorante was closed in preparation for the opening of a Sportsbook operation in late 2020.
- In 2021, the property successfully rebranded two (2) restaurants to enhance the guest dining experience.

The property also includes:

- 3,400 parking garage spaces
- Surface parking for 1,300 cars
- Valet parking
- Upscale Retail Store

III. MISSION STATEMENT

Human caring and individuality are central to Wind Creek Hospitality's approach to the guest experience. Attentiveness and positive energy, the cornerstones of the Wind Creek Hospitality brand of personalized service. Our genuine engagement and positive energy provide guests an escape from their ordinary world into our exciting fantasy world of play, chance, and possibility. With this contribution, we give them a feeling of belonging and importance.

IV. GOALS

To achieve the ultimate goal of a diverse workplace, the Wind Creek Bethlehem's Diversity Plan sets forth five (5) overall goals. These goals also set forth action steps taken by Wind Creek Bethlehem to achieve those goals. The overriding goals are as follows:

1. Diversity Education Demonstrate its commitment to a diverse and inclusive business culture.
 - All Team Members, including all management, participate in diversity awareness training.
 - Marketing materials show visible support of the Wind Creek Bethlehem's commitment to a culture of diversity.
 - Actively seek MBE/WBE vendors to provide goods and services.
2. Good faith plan to recruit, train, and upgrade diversity. Show evidence of establishing initiatives for recruiting, hiring, training, and promoting (upgrading), minority applicants/Team Members to achieve diversity at all job levels within Wind Creek Bethlehem.
 - Commitment to recruiting for and re-training a workforce which represents the entire spectrum of race, color, religion, gender, sexual orientation, age, national origin and physical or mental handicap or disability.
 - Advertise for recruitment to diverse communities through media that reaches women and minorities.
 - Recruit in local and regional print media and radio. These advertisements reflect diverse faces and voices.

- Recruit to a wide applicant pool including minority outreach by utilizing community career centers, local libraries and other minority concentric organizations as satellite recruitment centers.
 - Diversity concepts are integrated into hiring practices, orientation and training programs.
 - Provide Team Member's friendly development programs and skills training to promote career growth opportunities designed to retain talent.
 - Partner with organizations that represent minorities and the disabled to provide employment opportunities.
 - Partner with educational institutions to provide additional resources to existing and potential Team Members.
 - Partner with ESL and GED organizations throughout the Lehigh Valley.
3. Good faith plan for enhancing representation of diverse groups and equality of opportunity in employment: Wind Creek Bethlehem will enhance the representation and employment opportunities of diverse groups in the operation of its facility.
- Diligence in seeking contracts with MBE's/WBE's.
 - Partnerships with the Community Action Committee of the Lehigh Valley and the Community Action Development Corporation of Bethlehem to assist in identifying MBE and WBE businesses.
 - Designate a position in procurement to encourage and facilitate the use of MBE/WBE vendors and to track successes.
 - Offering several community seminars to educate MBE and WBE businesses and to what the needs of the casino are as it related to goods and services.
 - Giving "priority" consideration to MBE/WBE businesses when bidding for goods and services to the extent the law permits.
4. Establish accountability and monitoring systems to measure and report on the progress of Wind Creek Bethlehem's diversity activities and make the results of its actions available to the PGCB and the public.
- Track diversity in recruitment and hiring as well as minority and women vendor contracts.
 - Report on a quarterly basis to the Pennsylvania Gaming Control Board our diversity efforts.
5. Be active participants in the community – through volunteerism, charitable giving, and other community outreach efforts.
- Dedication to assisting the community in which our Team Members live, and we proactively reach out to those in need on order to encourage improved quality of life for everyone.
 - Support causes that empower the minority community, educate and motivate youth as well as other charitable and educational causes.

- Partner with civic and nonprofit organizations that affect our community.
- Donate to local organizations at appropriate levels.
- Participate in community and cultural events.
- Regular communication with community leaders and City officials about issues of importance including achieving the goals of diversity.

V. DIVERSITY IN EMPLOYMENT EFFORTS

Wind Creek Bethlehem is an Equal Opportunity Employer. It is the policy and practice of Wind Creek Bethlehem that all Team Members be treated equally without regard to race, color, religion, sex, age, sexual orientation, national origin, physical or mental handicap or disability where they can perform all of the essential job functions with or without reasonable accommodation. This policy applies to all privileges including recruitment, hiring, promotion, transfer, and renewal of employment, selection for training or apprenticeship, termination, discipline, length of service and/or terms and conditions of employment.

In addition to providing equal opportunities for all Team Members, it is the Wind Creek Bethlehem's policy to provide a positive and inclusive work environment which values individual differences and enables every team member to contribute and develop to the level of his or her potential.

To that end, it is the goal of Wind Creek Bethlehem that:

- Team Members are respectful in work and actions toward other Team Members;
- Company policies, procedures and systems will support and encourage diversity;
- An environment is created in which each Team Member can enhance his or her individual skills, abilities and levels of expertise;
- Each Team Member will recognize, respect and positively respond to the diversity of guests and suppliers of Wind Creek Bethlehem as well as that of their fellow Team Members.

It is the belief of Wind Creek Bethlehem that valuing and celebrating diversity will result in respected and creative Team Members and a high level of guest and Team Member satisfaction.

Recruitment

1. Advertising

In an effort to attract the most qualified applicants to fill the positions available, Wind Creek Bethlehem, utilizes an established "Recruitment Media Plan". This includes the use of billboards, newspapers, radio, internet advertising and social

media. All print media and radio include diverse persons and voices. Consideration is given to media that would attract ethnically diverse applicants. Below are examples of advertisement placement:

- Radio Advertising in both English, Spanish and Mandarin to reach out to ethnic communities
- Advertisement for employment in specific print media to reach out to different ethnic communities
- Use of 31x30 poster sheets advertising our employment website. The posters are in both English and Spanish.
- Billboard advertising is utilized specifically for culinary and Table Games positions
- Email blasts to anyone in the Applicant Tracking System “Talent Community”
- Postcard mailing to Southside Bethlehem residents.
- Bus Shelter advertisements
- Social media for recruitment purposes, specifically, LinkedIn and Facebook.
- Text Message communication to applicants, using the Applicant Tracking System platform.

2. Website

The Wind Creek Bethlehem website provides applicants with access to the online application process. This website provides information as to the types of jobs to be filled, along with directions to and hours of operation for the Employment Center. On this website are specific landing pages for all positions with information related to individual departments.

3. Satellite Recruitment Centers

Wind Creek Bethlehem has partnered with several diverse organizations in Bethlehem, Allentown and Easton to serve as satellite recruitment centers. Wind Creek Bethlehem will provide training at the centers related to the online application process to these organizations. These organizations assist their clients with the online application process and serve as an intermediary with questions or concerns regarding the application process. Organizations used in this manner are:

- Southside Branch of Bethlehem Public Library
- Hispanic American Organization
- St. Luke’s Neighborhood Center
- ProJeCT of Easton
- Hispanic Center- Bethlehem

4. Job Fairs

Wind Creek Bethlehem participates in several job fairs throughout the year. These job fairs include:

- Lehigh Valley Mall
- Kutztown University- sponsored by Congressman Dent
- Northampton Community College
- Liberty High School
- Freedom High School
- William Allen High School
- Bethlehem Area Vo-Tech School
- McCann School of Business
- Cumulus CAT 104
- Donegan Elementary School – for parents of students
- PA Career Link
- The Morning Call
- Lehigh Valley Phantoms
- Culinary Focused Job Fairs on local and national level (CIA, Northampton Community College, Johnson and Wales) to provide internships and full-time employment.
- Monthly “Career Tuesday” Job Fair at our Employment Center
- Weekly Friday Job Fairs at our Employment Center
- Several job fairs at organizations that have GED or ESL classes, such as the Allentown Literacy Center, the Southside Bethlehem Hispanic Center, and Project Easton.
- Wind Creek Bethlehem Dealer School Information Sessions (see Section VI “Table Games” for more information on the Wind Creek Bethlehem Dealer School).

5. Partnerships with Non-Profits for the Disabled

Wind Creek Bethlehem has partnered with both Good Shepard Hospital and VIA of Lehigh Valley to create opportunities for their clients who are physically or mentally challenged to work at Wind Creek Bethlehem. Wind Creek Bethlehem currently employs 3 team members with physical or mental challenges through these organizations.

6. Social Media and other System Driven Methods

Wind Creek Bethlehem is focused on the use of social media and technology to communicate job openings to potential job seekers including the use of:

- Symphony Talent candidate database to match skills and work history with current openings
- Email blasts from Symphony Talent Recruiting Marketing to communicate job fairs, openings, and other employment-related opportunities to 13,000+ local job seekers.

- Weekly social media posts on LinkedIn and Facebook to highlight weekly “spotlighted” jobs.
- Employee testimonial video on our Career Website.
- Text Message Recruitment utilizing the “ATS” platform.

The Hiring Process

1. Employment Center

The Wind Creek Bethlehem Employment Center is currently located on the street level of the Retail Outlet mall. There are computers available for applicants to complete the online employment application and persons available to assist with this process.

In addition to the computers available at the Wind Creek Bethlehem Employment Center, the following locations also act as satellite locations for applicants to complete an online application:

- Southside Branch of Bethlehem Public Library: 400 Webster Street, Bethlehem
- Hispanic American Organization: 462 Walnut Street, Allentown
- St. Luke’s Neighborhood Center: 435 N. 7th Street Allentown
- ProJeCT of Easton: 200 Ferry Street, Easton

2. Application Process

The application process is completely automated for applicants using an applicant tracking software called Symphony Talent. Applicants are directed to the application via the website at windcreekhospitality.com/careers.

3. The interview process

All applicants are required to schedule a pre-screening interview. During this interview, Recruitment Specialists evaluate applicants with regards to relevant experience in relation to the position for which they are applying, as well as friendliness and understanding of customer service.

Once an applicant is sent to a hiring manager for a second interview, their status is changed to a candidate to indicate that they have passed the initial pre-screening interview with the Recruiter. The hiring managers select the candidates to whom they will make an offer of employment.

4. Notifications to applicants not selected

Any applicant who does not make it through the pre-screening process and those who are interviewed by a hiring manager but are not selected, are notified via e-mail that another applicant has been selected for the position.

5. Background/Drug Test

Wind Creek Bethlehem requires that each candidate successfully complete a background check and a pre-employment drug test. All offers of employment are contingent on the successful completion of both.

6. Licensing

Wind Creek Bethlehem works very closely with the Pennsylvania Gaming Control Board division of Licensing to identify which positions require a license, and the level of license required. Once determined, Wind Creek Bethlehem works with all candidates to complete applications for said licenses. Slots Link, Pennsylvania's licensing application website, is accessible on all the computers in the Employment Center and via home computers. The candidate completes the Slots Link application during the onboarding process.

Training

Wind Creek Bethlehem is committed to training programs that promote career growth opportunities designed to retain talent. Our training efforts include Team Member orientation programs that familiarize the new Team Members with the facility, policies and procedures, benefits program, and the Team Member handbook. Disciplinary procedures and absenteeism policies are also reviewed with an emphasis on fairness and equality. Upgrading, or promotion from within the ranks of our Team Members, is another goal of Wind Creek Bethlehem. We believe that our strongest asset is a Team Member who is enthusiastic about his or her work and who is willing to pursue and is excited about promotional opportunities. We are in compliance with Federal and Pennsylvania State laws requiring the posting of Labor law posters in our facility, including, but not limited to the issues of Minimum Wage, OSHA, EEOC, Anti-Discrimination and Workers Compensation laws.

Examples of the training initiatives offered to Team Members include:

- New Hire Orientation
- Supervisory Training
- Transition from Line Level to Supervisor
- How to administer the Corrective Counseling Process
- Hazardous Material Training
- OSHA required courses
- Annual Internal Control training
- Title 31, OFAC and FRCPA Training
- Annual Compliance Training including Ethics policies

- Educational Assistance
- Management Training
- Experienced Dealer Training
- COVID-19 Training

In addition to the excellent courses offered to our Team Members onsite, Wind Creek Bethlehem works with Northampton Community College and the following Pennsylvania and Lehigh Valley community organizations to provide educational and/or training programs:

- Council on Compulsive and Problem Gambling of Pennsylvania
 - Compulsive and Problem Gambling Training
- Northampton Community College
 - Customer Service Training
 - New Supervisor Training
 - Workplace Safety Training
 - English as a Second Language
- Pennsylvania Liquor Control Board
 - RAMP/TIPS Certification

Additionally, Wind Creek Bethlehem has partnered with Northampton Community College to enhance its Hospitality program and to include courses such as Casino management, Surveillance and Hotel Operations.

In 2015, Sands added a Training Manager position to assist in identifying company training needs and to facilitate new training programs. The emphasis for training in 2016 was Compliance Training and improved Customer Service.

New in 2016 was the implementation of a hotel, casino and culinary internship program in partnership with Northampton Community College, Penn State University and Drexel University. Additionally, Sands started the process of developing an industry specific English as a Second Language program in partnership with professors from Alvernia University in Reading PA. Both the internship program and the English as a Second Language program were implemented in 2016.

In 2017, new training material was rolled out for our Team Members:

- Added “Nuts and Bolts” supervisory training for all supervisors and above.
- Replaced harassment training video in New Hire Orientation with an updated version
- Revised and updated New Supervisory Training material
- Continued ESL training through partnership with Northampton Community College

In 2019, Wind Creek Bethlehem hired a Training Supervisor to implement internal training initiatives such as Expectation Guide Training, COVID-19 Training, and Supervisor Essentials.

Team Member Relations

1. Policies and Procedures

Team Members are issued a Team Member handbook which includes key personnel policies, procedures, practices and expectations. Wind Creek Bethlehem's policies conform to all State and Federal regulations including but not limited to EEO, Harassment and Diversity. The policies were written to be fair, consistent and uniformly applied. The handbook is reviewed in detail during the new hire orientation and is periodically updated to provide new or amended policies. Additionally, all of the Wind Creek Bethlehem Property wide policies and procedures are available to every Team Member on the Team Member Self Service Center website.

2. Team Member Issues or Concerns

Our mission at Wind Creek Bethlehem is to make every customer interaction a personal invitation to return by providing unmatched customer service. To do this, we recognize that it is essential that we create a work environment that fosters excellence. One of the essential parts of this kind of environment is always treating Team Members with integrity and respect . This involves:

- Maintaining a work environment free of discrimination and harassment.
- Clearly communicating expectations, performance standards, policies and rules.
- Respecting our Team Members enough to care and truly listen to their complaints, concerns and suggestions.
- Responding to Team Members' complaints, concerns, and suggestions in a timely and honest way.
- Establishing systems that encourage open communication and that insure Team Members are treated fairly.

The Company has established the following programs with these goals in mind:

- Open Communication Policy- This program encourages excellent two- way communication between Team Members and Management with the goal of resolving issues quickly and fairly.
- Employee Assistance Program (EAP) – designed to provide every Team Member access to free support for the following: Life & Work stress, Financial & Legal advice, Mental & Physical health, Crisis Support, and more.

- Ethics Hotline – designed to enable Team member to report any issues including behavior or actions the Team Member believes are unethical. This is facilitated by a third party and all communications are anonymous.
- Team Member Surveys – The Company conducts Team Member surveys periodically in order to identify Team Members’ concerns and address them.
- Quarterly meetings with the General Manager/Exec VP whereby line level Team Members can voice concerns directly to the General Manager/Exec VP.

In addition, Wind Creek Bethlehem employs a team of three (3) Team Member Relations Supervisors to specifically work with departments on Team Member issues and concerns.

In late 2015, Sands Human Resources was permitted to add the position of Team Member Engagement Manager to direct efforts to Team Member engagement and retention. This position was hugely impactful in 2017, updating and standardizing our Team Member reward and recognition program and upgrading our Team Member events.

VI. CONTRIBUTION TO THE LOCAL COMMUNITY

Wind Creek Bethlehem continues to have regular communication with community leaders and City officials about issues of importance including achieving our goals for diversity. Wind Creek Bethlehem continues to be an active participant in the local community. Wind Creek Bethlehem has reached out to numerous cultural organizations, has participated in many charitable events, and has become a sponsor of several local community groups. Some of the organizations that we have partnered with or have made donations to are:

- St. Luke’s Trauma Center
- Council on Compulsive Gambling
- March of Dimes – East Central Pennsylvania
- Historic Bethlehem Partnership
- DeSales University
- Minsi Trail Council Boy Scouts
- National Museum of Industrial History
- Lehigh Valley Economic Development
- Center for Humanistic Change
- Southside Film Festival
- Office of MBE/WBE Businesses (a division of the Lehigh Valley Economic Development Corp.)
- Bethlehem Public Library
- Allentown Art Museum
- LV Chamber of Commerce
- Southside Neighborhood Center
- Trinity Soup Kitchen

- VIA Lehigh Valley
- Community Action Committee of Lehigh Valley
- Lehigh Valley Military Affairs Council
- Project of Easton
- Donegan Elementary School
- Victory House of Bethlehem

Specifically, Wind Creek Bethlehem has “adopted” Donegan Elementary School and funds, supports and participates in numerous programs with the students and faculty throughout the year.

VII. GENERAL PROCUREMENT VENDOR CONTRACTS

Wind Creek Bethlehem has made a real commitment and effort to use local businesses as vendors and suppliers. We have reached out to the larger community by establishing and growing business relationships with vendors who classify as MBE's or WBE's. We have made an effort to empower local MBE's and WBE's through outreach initiatives that help start, develop and expand businesses so that they can successfully bid on the goods and services for Wind Creek Bethlehem. MBE/WBE businesses receive “priority” consideration when bidding on goods and services to the extent permitted by law.

Wind Creek Bethlehem has partnered with the Community Action Committee of Lehigh Valley to assist in identifying MBE/WBE business and helping them through the certification process. Additionally, this organization encourages MBE/WBE to participate in the Wind Creek Bethlehem-sponsored mentor program.

As a socially responsible organization, Wind Creek Bethlehem partners wherever possible with 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 opportunity to bid on goods and services.

The following initiatives are in support of our diverse vendor procurement mission:

- Continue 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.
- Solicit the direct help of the Director of the PA Department of General Services and his staff to locate minority and women owned businesses that are capable of handling a project of this scope and size as well as assisting with the registering and certifying of minority and women owned businesses within the Commonwealth.

- Investigate the possibility of linking the Wind Creek Bethlehem website to the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity to facilitate awareness and to simplify the application process for potential vendors.
- Continue to host information seminars for local Minority and Women Owned Businesses.
- Continue to attend and support Pennsylvania regional minority business fairs.
- Periodically review the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity list of approved vendors for any changes.
- Create a mentoring environment for new and potential minority and women owned vendors so that they can better understand the needs of a casino facility and to possibly expand the line of products and services that they provide.
- Have user departments review annual budgets for purchasing opportunities and work with the minority database and reach out to those minority suppliers provided by the purchasing staff.
- Consider minority and women-owned business enterprises when reviewing Capital Expenditure projects.

Wind Creek Bethlehem will continue to follow these initiatives and to develop others as it continues to foster an inclusive business environment. Additionally, ensure that all vendors complete a vendor registration or certification packet before any contract or purchase order is issued.

These extensive efforts to identify, train and assist MBE/WBE, 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.

VIII. CONSTRUCTION PROCUREMENT

Wind Creek Bethlehem is committed to securing bids for construction projects from local minority businesses. Our efforts in seeking out and including minority

contractor and subcontractor participation during the initial casino build-out resulted in the successful completion of the project.

The plan for minority inclusion in any future construction projects will be to utilize the successful techniques and practices employed during the initial casino build-out and capitalize on the contractor, subcontractor and supplier relationships developed during this project. The following steps are critical as we attempt to carry this success forward to any future construction projects:

- Collaboration with construction managers who share our commitment to minority participation.
- Coordination with property-level and corporate purchasing departments as well as the Government Affairs Department in order to capitalize on their continuous search for qualified minority enterprises.
- Use of State of Pennsylvania, PA Gaming Control Board and other resources and databases to identify capable minority contractors and suppliers.
- Reaching out to the Pennsylvania Department of General Services to solicit assistance in locating minority owned construction companies and suppliers who were and are capable of handling projects of our size and scope.
- Continuation of specific procedures and processes that require construction managers to demonstrate efforts to identify minority contractors and suppliers before work is awarded.
- Requirements on the part of construction managers to track commitments to and dollars expended for minority contractors and suppliers.
- Coordination with construction managers to identify 2nd and 3rd tier subcontractor and supplier opportunities.
- Close coordination with construction managers to improve the onsite labor component of commitments made to minority contractors and suppliers.
- Periodic reporting of our minority commitment and fulfillment results to the Wind Creek Bethlehem Diversity Officer, the Pennsylvania Gaming Control Board and other involved parties.

CONCLUSION

Wind Creek Bethlehem is committed to achieving diversity in the workplace, to creating a strong community presence, and to being one of the best places to work in the Lehigh Valley. The systems, policies, training efforts, and commitment to the community that Wind Creek Bethlehem has put into motion will all work together in helping us achieve our diversity goals. Additionally, Wind Creek Bethlehem is committed to seeking and engaging minority and female businesses to provide goods and services.