



ILLINOIS GAMING BOARD

JB Pritzker • *Governor* Charles Schmadeke • *Chairman* Marcus D. Fruchter • *Administrator*

801 South 7th Street ♠ Suite 400 South ♣ Springfield, Illinois 62703 ♥ tel 217/524-0226 ♦ fax 217/524-0228

January 7, 2021

To the Honorable Members of the Illinois General Assembly

Greetings,

The Illinois Gambling Act [230 ILCS 10/7.11] requires the Illinois Gaming Board (the "IGB") to forward a copy of each casino owner licensee's Annual Report on Diversity to the General Assembly no later than February 1 of each year. The Illinois Gambling Act further requires the IGB to file the Annual Report with the Clerk of the House of Representatives and the Secretary of the Senate in electronic form only and with the following information provided by each licensee:

- A good faith affirmative action plan to recruit, train, and upgrade minority persons, women, and persons with a disability in all employment classifications;
- The total dollar amount of contracts that were awarded to businesses owned by minority persons, women and persons with a disability;
- The total number of businesses owned by minority persons, women, and persons with a disability that were utilized by the licensee;
- The utilization of businesses owned by minority persons, women, and persons with disabilities during the preceding year; and
- The outreach efforts used by the licensee to attract investors and businesses consisting of minority persons, women, and persons with a disability.

The IGB remains committed to working with all gaming licensees to support their diversity, equity and inclusion efforts in the areas of employment, vendor contracting and ownership.

Please do not hesitate to contact me should you have any questions or wish to discuss the Report or any issue related to Illinois gaming.

Kind regards,

A handwritten signature in blue ink that reads "Marcus D. Fruchter".

Marcus D. Fruchter
Administrator



December 29, 2020

Mr. Marcus Fruchter
Administrator
Illinois Gaming Board
160 N. LaSalle, Suite 300
Chicago, IL 60601

Re: 2020 Annual Report on Diversity

Dear Administrator Fruchter:

Pursuant to 230 ILCS 10 Sec. 7.11(a), Argosy Casino Alton submits the following information for our annual report on diversity:

(i) a good faith affirmative action plan to recruit, train, and upgrade minority persons, women, and persons with a disability in all employment classifications;

Argosy Casino Alton, LLC is a committed Equal Opportunity Employer. It is the policy of Argosy Casino Alton to not discriminate based on race, sex, sexual orientation, color, creed, national origin, age, disability, or veteran status or any other prohibited basis. We take all necessary and appropriate steps to ensure participation of minorities, women, and all other legally protected groups including, but not limited to, ownership, contracting, recruiting, and hiring in all employment classifications.

The Company will continue to administer all other personnel matters (such as compensation, benefits, transfers, layoffs, company-sponsored training, education, and social and recreational programs) in accordance with Company policy. (IL Human Rights Act 775 ILCS 5 /1-101 et. seq.)

The General Manager has the overall responsibility to implement the Company's Equal Employment Opportunity Policy. The Company has assigned coordination of responsibilities to implement the policy to the Director of Human Resources who has the full support of executive management.

The Director of Human Resources will ensure that the selection process, transfer and promotion practices, Company facilities, Company-sponsored recreational programs, training programs, and attitude of the workforce, managers, and supervisors follow and advance the goals of the Company's Affirmative Action Plan. Argosy Casino is focused on maintaining and celebrating diversity in the workplace. Argosy Casino will continue to operate its business under its Affirmative Action Plan and in full compliance with all applicable federal and State of Illinois statutes and regulations.

Argosy Casino considers the labor force of Madison County its primary labor pool and strives to mirror the diverse population of Madison County. The following initiatives have been undertaken to meet this goal:

1. **Current Trends** – We believe that Argosy Casino’s ongoing efforts to hire, train and promote a diverse employee base are effective as illustrated below. Madison County statistics are derived from the US Census Bureau, 2018:

Madison County Minority Population: 12.3%

Argosy Casino Alton Minority Population: 14.7%

2. **Diversity Communication** – Argosy Casino believes in communicating effectively with all employees regardless of race, age, ethnicity or gender.
 - a. Argosy Casino highlights diversity events and celebrations on our social media sites, print advertisement, and through local workforce development business partners.
3. **Diversity Recruitment** – In addition to standard recruitment channels, Argosy Casino actively recruits employees in areas where there are greater chances for finding qualified minority applicants, such as Lewis & Clark Community College, job fairs, and Jobs Plus (Veterans Affairs).
4. **Tuition Reimbursement** – Argosy Casino’s tuition reimbursement program allows us to recruit candidates that are interested in furthering their education with financial help from Argosy Casino. Tuition reimbursement is an important component of Argosy Casino’s commitment to promote from within and provide advancement opportunities to qualified women, minority, and disabled candidates.

Purchasing

(ii) the total dollar amount of contracts that were awarded to businesses owned by minority persons, women, and persons with a disability;

(iii) the total number of businesses owned by minority persons, women, and persons with a disability that were utilized by the licensee;

(iv) the utilization of businesses owned by minority persons, women, and persons with disabilities during the preceding year.

	Total MWDBE Spend 2020	Total # of MWDBEs	2020 Utilization of Total Spend
MBE	\$67,279.16	10	2.8%
WBE	\$559,014.28	30	23.9%
DBE	\$30,900.50	2	1.3%

(Note: the casino was closed for all of Q22020 and from November 20 through December 31, 2020.)

(v) the outreach efforts used by the licensee to attract investors and businesses consisting of minority persons, women, and persons with a disability.

Argosy Casino Alton and Penn National Gaming continuously look for new ways and opportunities to identify and establish relationships with new diversity suppliers. Ongoing efforts include:

- Maintain a database of qualified diverse vendors that we purchase from regularly;
- Review Penn National Gaming Supplier portal for newly registered businesses and follow-up with them as well as work with businesses in the process of becoming registered;
- Communicate with other Illinois casinos and Penn National Gaming properties to network and share potential qualified DBE, MBE, WBE, and Veteran-owned businesses;
- Update the Vendor Opportunities section of Argosy Casino Alton's website quarterly for bid opportunities, bulk purchases, and services;
- Send an invitation semi-annually to members of the Illinois Department of Central Management Services Business Enterprise Program (BEP) and Veterans Business Program (VBP) to participate in the casino's supplier diversity program and provide a link to vendor page on the casino's website;
- Provide access to the Penn National Gaming Supplier portal with instructions on how to become a vendor and contact information for the procurement team at the casino;
- Place an ad semi-annually in the official State of Illinois newspaper informing potential bidders about the opportunities available for upcoming contracts, bulk purchases, and services;
- Attend and/or co-host supplier diversity events;
- To the extent possible, award spending contracts to diversity vendors even if they are not the lowest bidder;
- As current relationships with diversity vendors end, we make every attempt to replace that spend with another diversity vendor.

Diversity Supplier Resources

- Argosy Casino Alton's diversity vendor database;
- Penn National Gaming's diversity vendor database;
- Penn National Gaming's national corporate contracts with diversity vendors;
- Illinois Casino Gaming Association's diversity vendor database;
- Supplier diversity events;
- Diversity Supplier websites such as:
 - Illinois Department of Central Management Services website: Business Enterprise Program and Veterans Business Program (cms.diversitycompliance.com)
 - City of Chicago (chicago.mwdbe.com)
 - Bi-State Development Supplier Diversity Vendor Database (metroslouis.dbesystem.com)
 - Veteran Owned Business (veteranownedbusiness.com)

**CASINO QUEEN INC.
230 ILCS 10/7.11 NEW
SECTION 7.11 Annual Report on Diversity
FOR REPORTING PERIOD 1.1.2020 TO 12.31.2020**

This Annual Diversity Report contains the following information reflected on the respective tabs of this file for the above reporting period as follows:

- i. Casino Queen Inc.'s good faith Affirmative Action Plan to recruit, train and upgrade minority persons, women, and persons with disabilities.
- ii. Total dollar amount of contracts that were awarded to businesses owned by MBE, WBE, DBE.
- iii. Total number of businesses owned by MBE, WBE, and DBE's that were utilized by the Casino Queen.
- iv. The utilization of businesses owned by MBE, WBE and DBE.
- v. Outreach efforts used by the Casino Queen to attract investors and businesses consisting of MBE, WBE, and DBE's.

**CASINO QUEEN
AFFIRMATIVE ACTION PLAN**

I. STATEMENT OF PURPOSE

Casino Queen is committed to providing Equal Employment Opportunity and supportive environment with respect to hiring, compensation, training, promotions and other conditions of employment to qualified individuals, without regard to race, color, religion, disability, national origin, age, sex, or other protected class.

However, providing Equal Employment Opportunity alone may not be enough to break down long-standing stereotyping of occupations or to avoid an unreasonable adverse impact or disparate treatment. Casino Queen will monitor the balance between the number of women or minorities in Casino Queen's labor market and the number employed. In the event of a manifest imbalance or unreasonable disparity between Casino Queen women and minority employment and the Local Labor Market ("Significant Underutilization"), Casino Queen will implement the Methods described in this Affirmative Action Plan until a reasonable balance is restored.

II. INTERNAL MONITORING-UTILIZATION ANALYSIS

A: Data Collection: In order to ensure that women and minorities are not Significantly Underutilized in all employment classifications, Casino Queen will analyze data to determine if a Significant Underutilization exists. Casino Queen will annually:

1. Prepare and file with the U.S. Equal Employment Opportunity Commission the required EEO-1, component 1 data, report identifying Casino Queen women and minorities employed in each EEO-1 report job classification. (If Casino Queen no longer is required to file the EEO-1 report, it will prepare an equivalent report annually)
2. Within 3 months of filing the EEO-1 report, obtain the most recently available U.S. Census (or U.S. Census estimate) percentages of women and minorities reflected in the population of Madison and St. Clair counties (Casino Queen's Labor Market).

The above information will assist the Casino Queen in determining if women or minorities are Significantly Underutilized in any job classifications.

- B. Performance:** Human Resources will perform a utilization analysis comparing the

EEO-1 reported women and minority percentages in each employment classification to the women and minority percentages in Casino Queen's Labor Market and account for smaller statistical pools (under 100 persons) with a substitution factor. Human Resources may use objective factors to make adjustments to percentages in Casino Queen's Labor Market that affect the availability of in relevant job classification (for example accounting for the availability of qualified labor in a particular classification). Human Resources will determine that a Significant Underutilization exists if:

1. Casino Queen's employment percentages of women and minorities in any employment classification that contains at least 100 individuals fall more than 5 percent below Casino Queen's Labor Market percentages; or
2. Casino Queen's employment percentages of women and minorities in any employment classification that contains at least 50 individuals but not more than 99 individuals fall more than 5 percent below Casino Queen's Labor Market percentages, unless substituting 5 respective women or minorities would bring the difference within 5 percent; or
3. Casino Queen's employment percentages of women and minorities in any employment classification that contains at least 20 individuals but not more than 49 individuals fall more than 5 percent below Casino Queen's Labor Market percentages, unless substituting 4 respective women or minorities would bring the difference within 5 percent; or
4. Casino Queen's employment percentages of women and minorities in any employment classification that contains under 20 individuals fall more than 5 percent below Casino Queen's Labor Market percentages, unless the substituting of 3 respective women or minorities would bring the difference within 5 percent.

Upon completion of the analysis, Human Resources will report the percentages and whether a Significant Underutilization exists to the General Manager. If a particular job classification is identified as Significantly Underutilized, the General Manager and the Human Resources will implement the Methods of this Affirmative Action Plan to cure such underutilization within a reasonable time period based upon job availability in the identified job classification.

Human Resources will continue to monitor a job classification that is Significantly Underutilized for performance. Upon achieving reasonable balance within the specifications of this Affirmative Action Plan, Human Resources will inform the General Manager and Casino Queen will return to neutral Equal Employment Opportunity practices.

Human Resources will forward the utilization analysis to the compliance officer who will retain the records for 5 years minimum.

III. AFFIRMATIVE ACTION METHODS TO CURE SIGNIFICANT UNDERUTILIZATION

There are three primary methods the Casino Queen will use to achieve its goal of equal employment through Affirmative Action:

- **Recruitment Procedures** - Increase representation of members of protected classes through special recruitment efforts.
- **Increased Opportunities** - Provide opportunities for members of protected classes to move into higher job classifications.
- **Community Outreach** - Improve opportunities for members of protected classes to obtain educational and personal achievements necessary for higher level job classifications.

IV. IMPLEMENTATION OF METHODS

A. Recruitment Procedures

Goal: To increase recruitment efforts with respect to protected classes, with the goal of increasing the pool of qualified applicants from the protected classes.

Action to Be Taken: In addition to ordinary media used, job openings will be listed in media that are historically better utilized by the protected classes.

B. Increased Opportunities

Goal: Provide opportunities for more members of protected classes to move into higher level job classifications.

Action to Be Taken: Maintain accurate statistics on employment of members of protected classes. Use these statistics to identify job classifications for which particular in-house and at-large recruitment efforts should be aimed. Encourage members of protected classes to apply for promotions to higher job classifications. A thorough discussion of the Casino Queen's

Affirmative Action Plan will be included as part of the regular departmental staff meetings.

C. Community Outreach

Goal: Provide services to the community that will demonstrate the Casino Queen's commitment to equal opportunity employment, and help train members of protected classes, with the goal of increasing the applicant pool from the protected classes.

Action to Be Taken: Casino Queen will identify and participate in job fairs and other community events that are likely to attract members of protected classes.

Human Resources will forward a record of the Methods implemented to cure a Significant Underutilization to the compliance officer who will retain the records for a minimum of 5 years.

V. ASSIGNMENT OF RESPONSIBILITIES FOR EQUAL EMPLOYMENT AND AFFIRMATIVE ACTION

A. Duties of the General Manager

The General Manager with the assistance of Human Resources and all Department Managers of the Casino Queen will be responsible for the implementation and administration of the Affirmative Action Plan. The duties of the General Manager and Human Resources will include:

- Develop and recommend policies, programs and procedures to implement the Affirmative Action commitment and goals.
- Train and assist affected departmental managers in arriving at solutions to Affirmative Action problems.
- Disseminate the Affirmative Action Plan to affected departmental managers and maintain communications to assure that the policy is understood and implemented.
- Report regularly to the Casino Queen's board of directors regarding periods that Methods of the Affirmative Action Plan are implemented to cure a Significant Underutilization.
- Direct the Human Resource Department to implement reporting systems to measure the effectiveness of the Affirmative Action Plan. This will include reports of new hires, terminations, promotions, transfers, etc.
- Assure that a responsible recruitment effort is undertaken.
- In cases where managers and supervisory personnel fail to adhere to the provisions

of the Affirmative Action Plan, take corrective action.

- Direct internal special audits as needed to ensure compliance

B. Duties of Managers and Department Heads:

- Participate in regular discussions with supervisors and employees to assure that the Casino Queen's Affirmative Action Plan is being followed.

- Review the qualifications of all employees to assure that minorities, women and other members of protected classes are given full opportunities to advance through transfers and promotions.

- Career counseling for all employees as requested and required.
- Be alert to any discriminatory attitudes in subordinates.
- Be knowledgeable with the specifics of the Affirmative Action goals and objectives

and identify areas where they are not being met.

- Insure that pay rates, benefits, work assignments and disciplinary actions are administered on an equal basis.

- Consult with the General Manager and Human Resources on any special or unusual adjustment problems.

(ii). The total dollar amount of contracts that were AWARDED to businesses owned by minority persons (MBE), women (WBE), and persons with disabilities (DBE) are as follows from 1.1.20 TO 12.31.2020
Does not include contracts entered into in previous years for 2020.

Value of MBE Purchase Orders plus written contracts awarded - \$69,775

Value of WBE Purchase Orders plus written contracts awarded- \$229,075

Value of DBE Purchase Orders plus written contracts awarded- \$16,292

Value of vbe Purchase Orders plus written contracts awarded- \$10,420

TOTAL AWARDED IN 2020	\$325,562
------------------------------	------------------

(iii) The total number of business owned by minority person (MBE), women (WBE), and persons with disabilities (DBE) that were utilized by licensee from 1.1.20 to 12.31.2020

	<u># OF VENDORS</u>	<u>% OF TOTAL VENDORS USED</u>
WBE	28	7.78%
MBE	15	4.17%
DBE	3	0.83%
VBE	1	0.28%
TOTAL WBE, WBE, DBE, VBE	47	13.06%

OVERALL TOTAL VENDORS IN 2020 360

(iv.) The utilization of businesses owned by minority persons (MBE), women (WBE), and persons with disabilities (DBE) that were utilized during the preceding year 1.1.2020 to 12.31.2020

% OF TOTAL SPEND - NO EXEMPTIONS

WBE	5.70%
MBE	1.40%
DBE	0.19%
VBE	0.07%

Total Spend 1.1.20 TO 12.31.2020

MBE	\$83,455.00
WBE	\$341,521.00
DBE	\$ 11,551.00
VBE	\$ 4,438.00

TOTAL SPEND FOR 2020 MBE, DBE, WBE, VBE	\$440,965.00
--	---------------------

OVERALL SPEND FOR 2020 - NO EXEMPTIONS	6,040,638
---	------------------

(v.) The outreach efforts used by the licensee to attract investors and business consisting of minority persons, women and persons with a disability are outlined below:

1. Casino Queen maintains Web site link with Casino Queen Diversity Statement. Vendors can see our products going out for bid throughout the year. This is updated every quarter.
2. Leveraging local **publications** such as:
 - A. The St. Louis American – started May 2017, an African American owned publication.
 - B. Diversity Plus magazine
3. CQ reviews and recruits from the following 2 web sites PLUS 3 excel databases each time the Company goes out to bid on a product / service . . . renewals, new product, etc.
 - a. State of IL <https://cms.diversitycompliance.com/> - which identifies diverse vendors
 - b. MO Gaming Commission - http://www.mgc.dps.mo.gov/MbeWbe/mw_main.html - which identifies diverse vendors
 - c. Federal (Native American) Diversity <https://govtribe.com/vendor>
4. List supplied by the ICGA – (Illinois Casino Gaming Association) – VENDOR PROJECT FOLDER – which identifies diverse vendors
5. St. Louis Airport Authority list - VENDOR PROJECT FOLDER – which identifies diverse vendors
6. Publish quarterly in the BREEZE COURIER, which is the State of Illinois newspaper, CQ's announcement regarding Diverse Business Suppliers Wanted:
7. Network with other companies, including local Casino's, in area who have diversity requirements.

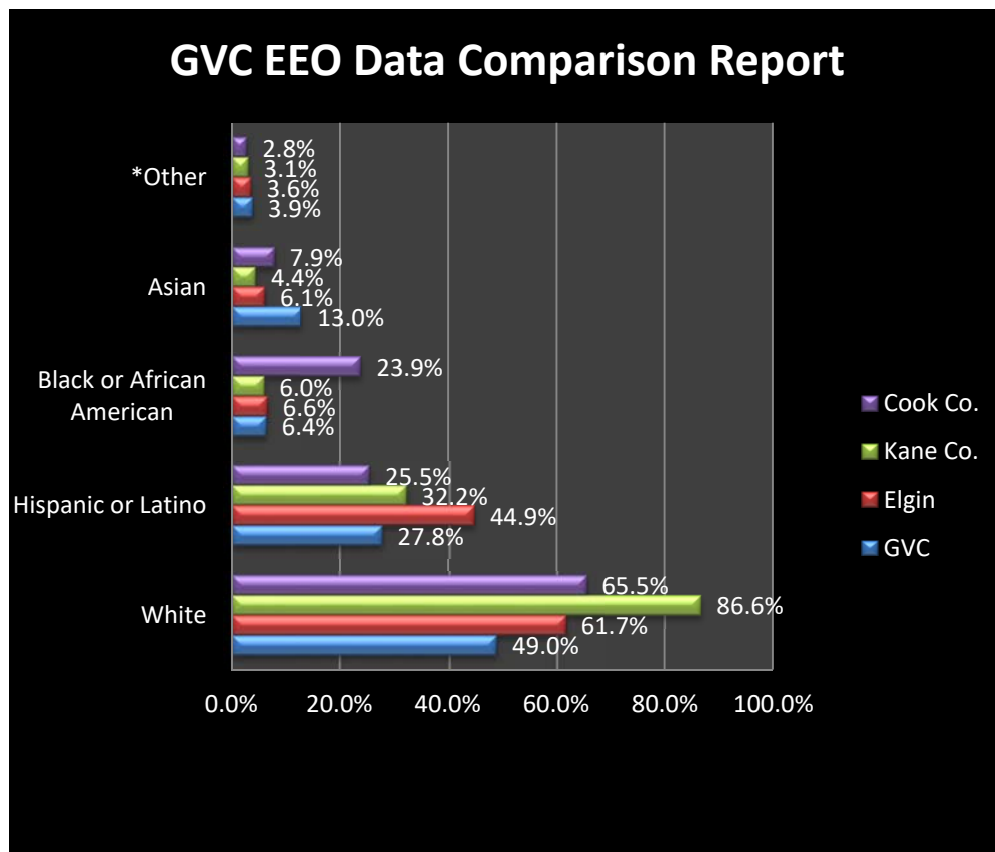
**Grand Victoria Casino
Annual Report on Diversity (230 ILCS 10/7.11)**

Grand Victoria Casino (GVC) is committed to serve its host community and the region in its capacity as a contributing corporate citizen and an equal opportunity employer. GVC is actively engaged in the following social investment areas:

Employee Based Diversity Plan

Staffing at all levels represents an excellent diversity mix that reflects the ratios of the local community. (See below for the Employee and Surrounding Community Demographics chart and 2018 Employer Information Report submitted for Equal Employment Opportunity). The total number of minority in management at GVC accounts for 35% of all employees. The total number of female & minority in management at GVC accounts for 54% of all employees (See below for the GVC Minority Summary 2018).

GVC has in place a group represented by women and minority employees from various levels that represent the property as the “Employee Diversity Committee”. The Employee Diversity Committee has promoted employee involvement in community volunteer programs.



Source: U.S. Census Bureau, Census 2010 and GVC EEO dated 08/16/2016.

Elgin Census data: Hispanics may be of any race, so also are included in applicable race categories per U.S. Census

*Other includes Native Hawaiian or Pacific Islander, American Indian or Alaskan Native and Two or more races. Source U.S. Census Bureau, 2010 Census figures

**Grand Victoria Casino
Annual Report on Diversity (230 ILCS 10/7.11)**

Due to COVID, it has not yet been required to file the 2019 EEO report. The 2018 EEO report is the latest version.

CO= HK65686 TE= T007920		EQUAL EMPLOYMENT OPPORTUNITY 2018 EMPLOYER INFORMATION REPORT INDIVIDUAL ESTABLISHMENT REPORT - TYPE 4											SECTION C - TEST FOR FILING REQUIREMENT		
SECTION B - COMPANY IDENTIFICATION		SECTION E - ESTABLISHMENT INFORMATION											NAICS: 713210 Casinos (except Casino Hotels)		
1. ELDORADO RESORTS INC 100 WEST LIBERTY STREET SUITE 1150 RENO, NV 89501		2. ELGIN RIVERBOAT RESORT-RIVERBOAT CA 250 S GROVE AVE ELGIN, IL 60120 KANE COUNTY											1-Y 2-N 3-N DUNS NO.: EIN :363918332		
SECTION D - EMPLOYMENT DATA		SECTION F - REMARKS													
JOB CATEGORIES	HISPANIC OR LATINO		NOT-HISPANIC OR LATINO											OVERALL TOTALS	
	MALE	FEMALE	*****MALE*****						*****FEMALE*****						
			WHITE	BLACK OR AFRICAN AMERICAN	NATIVE HAWAIIAN OR PACIFIC ISLANDER	ASIAN	AMERICAN INDIAN OR ALASKAN NATIVE	TWO OR MORE RACES	WHITE	BLACK OR AFRICAN AMERICAN	NATIVE HAWAIIAN OR PACIFIC ISLANDER	ASIAN	AMERICAN INDIAN OR ALASKAN NATIVE	TWO OR MORE RACES	
EXECUTIVE/SR OFFICIALS & MGRS	1	0	9	1	0	0	0	0	2	0	0	1	0	0	14
FIRST/MID OFFICIALS & MGRS	8	6	30	3	0	3	0	0	14	4	0	2	0	1	71
PROFESSIONALS	3	2	13	0	1	1	0	1	7	2	0	5	0	0	35
TECHNICIANS	4	0	12	1	0	3	0	0	1	0	0	2	0	0	23
SALES WORKERS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ADMINISTRATIVE SUPPORT	3	12	8	2	0	2	0	1	23	8	0	10	0	3	72
CRAFT WORKERS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
OPERATIVES	0	0	6	0	0	0	0	0	3	1	0	0	0	0	10
LABORERS & HELPERS	10	12	14	1	0	3	0	1	1	1	0	1	0	0	44
SERVICE WORKERS	55	79	106	11	2	33	1	9	95	10	1	25	1	5	433
TOTAL	84	111	198	19	3	45	1	12	146	26	1	46	1	9	702
PREVIOUS REPORT TOTAL															

Employee Education Plan

Grand Victoria Casino is committed to employment opportunities for qualified individuals, as well as career opportunities for those with a desire to succeed. We are committed to the personal growth and development of our staff, and we have a solid history of promoting from within. In our company, today's front line employees are tomorrow's managers and directors.

Because we believe that employees are our greatest asset, we're prepared to invest all that we can towards an employee's personal and professional development. Our training programs help develop skills in such highly specialized areas as cage cashiers, food and beverage, security, surveillance, casino games dealers and much more.

In addition to our own specialized programs, Grand Victoria Casino strives to develop a better educated and more highly skilled work force by providing up to \$2,000.00 per year in educational assistance. We also offer *English as a Second Language* courses on-site as well as advance payment for *English as a Second Language* courses offered at off-site locations.

In the past year, an average of 25 employees have utilized our Tuition Reimbursement Program. Of those individuals, on average, 17 were of a minority status. This included Females, Hispanics, Blacks/African Americans, Asian and Two or More Races.

Grand Victoria Casino's plan for employment is to maintain the same or similar staffing and training levels for our current positions. The majority (99%) of our employees have residence

**Grand Victoria Casino
Annual Report on Diversity (230 ILCS 10/7.11)**

within the state of Illinois. Grand Victoria Casino provides the following training for our current 650 (approximate) employees:

Training Course Descriptions - All Employees

Orientation

This is a 5-hour program to welcome new employees and introduce them to the Company's history, philosophies, policies and procedures, and to educate employees about the regulatory nature of the industry and their compliance obligations. This program is mandatory for all employees, and is attended on the employee's first day of employment. Topics include:

- History of the property/ Introduction of the parent companies
- Property role within the community/employee's community service discussion
- Riverboat Gambling Act
- Illinois Gaming Board
- Licensing process, requirements, and obligations
- Conduct and ethics
- Title 31 (CTR and SAR)
- Players Club and marketing programs
- Guest service philosophy/Company cultural initiatives
- OSHA regulations and safety practices (Bloodborne Pathogens, Right-to-Know/MSDS, Back Safety, Lock-out/Tag-out, Eye Wash Stations, Fire Safety, Emergency evacuation procedures)
- Security contact-4357 (HELP)
- Security awareness
- Responsible and underage gaming
- IGB statewide voluntary self-exclusion program
- Property Policies and Procedures
- Alcoholic Beverage Control Policy
- Diversity and Harassment
- Employee Programs
- Property Tour

Benefits Enrollment

This is a 1.5 hour program to introduce employees to the employee benefit programs and allow interested employees an opportunity to enroll in health, dental, life and vision insurance. This program is mandatory for all full-time employees and is attended within the first full month of employment. Topics include:

- Military Leave of Absence
- Victims' Economic Security and Safety Act (VESSA)
- Tuition Reimbursement Program
- English as a Second Language Educational Assistance Program (ESL)
- Family and Medical Leave Act (FMLA)

**Grand Victoria Casino
Annual Report on Diversity (230 ILCS 10/7.11)**

Military Family Leave/Exigency
Military Caregiver Leave
VESSA Leave
Military Family Leave Act
Employee Profit Sharing and Investment Plan
Employee Benefits and Enrollment (Discussed are Highlights of the Medical, Dental, Vision, and Life Insurance package)

Re-Orientation

This is a 1 hour program to remind current employees about Company policies and procedures, regulatory obligations, and safety practices and procedures. This program is mandatory for all employees and is required annually. Topics include:

OSHA regulations and safety Practices (Bloodborne Pathogens, Right-to-Know/MSDS, Back Safety, Lock-out/Tag-out, Eye Wash Stations, Fire Safety, Emergency Evacuation Procedures)
Compulsive and underage Gaming
IGB Statewide Voluntary Self - Exclusion Program
Alcoholic Beverage Control Policy
Harassment and Diversity
Regulations and Reporting Obligations
Security Contact - 4357 (HELP)
Security Awareness

PCI Compliance Training

This is training for Payment Card Industry (PCI) - Data Security Standards (DSS) This program is mandatory for employees who are responsible for protecting credit card data. For employees with a company email account complete online Cybersecurity Training. This program is mandatory for new hires and annually to employees who handle credit cards during their normal work duties. Topics include:

How to handle a suspected loss or theft of ANY materials containing cardholder data
How to inspect point of sale devices for tampering
Credit Card handling procedures (Picture ID, provide receipt, call manager if suspicious)

AML Training Program

Grand Victoria Casino is committed to maintaining an effective anti-money laundering ("AML") training program that fosters an understanding of AML responsibilities across all levels of the organization. AML training and testing content is created and updated at the corporate level, and provided to all subsidiary properties for dissemination to employees. All new hire and transfer training with AML training requirements must be completed during the

**Grand Victoria Casino
Annual Report on Diversity (230 ILCS 10/7.11)**

HR Orientation process and all employees with AML training requirements must complete an annual AML refresher training once per calendar year.

Supplier Diversity Strategy Plan

GVC strives to increase business participation with disadvantage, minority and female owned businesses, as well as locally owned businesses. GVC's success is due to its commitment to develop a strong working relationship with many local vendors. GVC has been very active in promoting and pursuing diversity vendors.

2021 Goals and Plans for Achievement

CASINO 2021 GOALS					2021 IGB GOALS				
DBE	MBE	WBE	VBE	TOTAL	DBE	MBE	WBE	VBE	TOTAL
2%	11%	7%	3%	23%	2%	11%	7%	3%	23%

2020 (through 11/30/2020)

- \$1,751,515 Total dollar amount of contracts that were awarded to businesses owned by minority persons, women and persons with a disability.
- 32 The total number of businesses owned by minority persons, women, and persons with a disability that were utilized by Grand Victoria Casino.
- 22% (of total spend) The utilization of businesses owned by minority persons, women, and persons with disabilities during the preceding year.

Outreach Efforts Businesses

- Provide access to potential suppliers on the GVC website in the gaming supplier portal with instructions on how to become a vendor. In this portal there is also a list of upcoming opportunities and contact information for the Procurement team.
- Place an ad in the official State of Illinois Newspaper informing potential bidders about the opportunities available for upcoming contracts.
- Communicate with other IL casinos to network and share potential qualified DBE, MBE & WBE vendors.
- The Purchasing Director is on the Board of Directors for the Chicago Minority Supplier Development Council. As a board member the Purchasing Director is able to assist potential suppliers with certification. In addition, the Purchasing Director is able to network with other business leaders that specialize in supplier diversity.
- Dorothea Jones, a Buyer for GVC is on the Board of Directors for the Quad County African American Chamber of Commerce. In this capacity she is able to utilize her

**Grand Victoria Casino
Annual Report on Diversity (230 ILCS 10/7.11)**

position to network with additional resources to help identify potential new diverse suppliers.

SPECIFIC VENDOR OPPORTUNITIES

- GVC is part of Caesars Entertainment. Vendor information will be shared across all Caesars properties allowing for more opportunity for Illinois based suppliers.
- GVC will contact Chicago and surrounding Veteran Affairs groups to invite their members and encourage business owners to attend our vendor fair. We will also be providing assistance to these groups to get them certified at the fair.

SPECIFIC OUTREACH EVENTS

- GVC is a member of, and will continue to support and attend events hosted by, the Chicago Minority Business Development Council, Illinois Hispanic Chamber of Commerce, Illinois State Black Chamber of Commerce, Quad County African American Chamber of Commerce and the Elgin Area Chamber of Commerce.
- GVC will sponsor and host a booth at the Chicago Business Opportunity Fair in April 2021.

CORPORATE PROCUREMENT

- Caesars has instituted an internal National Committee on Supplier Diversity. The purpose of this committee is to cross-pollenate diversity supplier ideas, processes and vendors.
- Suppliers will now be given opportunities with Caesars Properties across the country.

INTERNAL PROCUREMENT PROCESS/IDENTIFYING DIVERSE VENDORS

- GVC aggressively targets MWDBE in our bid process.
- GVC utilizes state and private organization websites to search for diverse suppliers. (i.e., CMSDC vendor database, BEP Certification portal).

OTHER

- GVC is requiring its major suppliers to share their diversity initiatives with us and align their goals with ours.
- Major suppliers are being asked to report diversity spend with business related to the GVC so that we can better identify tier 2 spend.
- GVC will reach out to Kane County to see if they have programs or measures that will assist us.

HARRAH'S JOLIET CASINO & HOTEL

AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY PLAN

I. INTRODUCTION

This affirmative action/equal employment opportunity plan document has been promulgated and adopted by Des Plaines Development Limited Partnership, d/b/a Harrah's Joliet Casino & Hotel (hereafter referred to as "the Company") for the purpose of compliance with the requirements of the Riverboat Gambling Act of the State of Illinois and the corporate policy of Caesars Entertainment, Inc., both of which require the company to recruit, train and upgrade minorities and persons in other protected classifications in all employment classifications.¹ This plan is subject to all applicable state and federal laws including but not limited to Title VII of the Civil Rights Act of 1964. The purpose of this plan document is to formalize the Company's efforts to promote and maintain a diverse work environment, one free from discrimination or harassment of any kind. This formalization includes but not limited to:

1. Assignment of specific responsibilities for Plan compliance;
2. Adoption of procedures for receiving, investigating and responding to employee complaints of discrimination or harassment;
3. Adoption of specific tactics to meet affirmative action/equal employment opportunity obligations including outreach and recruitment;
4. Periodic review of the Company's Plan compliance by the Affirmative Action/Equal Employment Opportunity Committee;
5. Communication of affirmative action/equal employment opportunity efforts to employees.

The provisions of this Plan are subject at all times to the governing principle that in all employment decisions, the Company shall make all selections in a non-discriminatory manner. The Plan is not intended, nor should it be used as a justification to extend a preference to any individual, or to select an individual or adversely affect an individual's employment status on the basis of that person's race, creed, color, national origin, ancestry, affectational or sexual orientation, gender, age, marital status, nationality, liability for service in the armed forces or disability (where reasonable accommodation may be allowed for such disability without causing an undue hardship). Furthermore, this plan is not intended to require, cause or influence any supervisor or manager to consider any factor other than the individual

¹ Neither the term "minorities" nor "employment classification" is defined in the statute or in the regulations of the IGB. Therefore, the Company understands and will utilize these terms in accordance with the definitions of these respective terms set forth in the rules and guidelines of the United States Equal Employment Opportunity Commission.

qualifications of the person under consideration for hiring or promotion when making any personnel decision.

I. POLICY STATEMENT AND DISSEMINATION TO EMPLOYEES

The company's policy statement with regard to affirmative action/equal employment opportunity is to be signed by the senior executive of the Company being the Senior Vice President & General Manager and is attached hereto as Appendix A. This policy will be disseminated to employees by way of the following mechanisms: periodic publication in employee newsletters and bulletins; posting in employee common areas; distribution in new hire orientation; distribution and discussion in periodic employee training.

II. DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION

The overall responsibility for implementation, monitoring and amendment (if necessary) of this Plan shall reside with the Affirmative Action/Equal Employment Opportunity Committee. The Committee shall be composed of the Senior Vice President & General Manager, Director of Human Resources and Equal Employment Officer, Vice President of Operations and Vice President of Finance & Administration. The EEO Officer shall be primarily responsible for the day-to-day implementation of the Plan and will have the following responsibilities and authority:

Will have direct access to Senior Vice President & General Manager on affirmative action / EEO related matters.

Monitors and reviews all aspects of the personnel procedures and decisions of the Company.

Oversees employment practices designed to promote the Company's compliance with the Social Investment Plan submitted by the Company to the Illinois Gaming Board.

Recommends in writing to the Senior Vice President & General Manager, the suspension of any personnel procedure, decision or transaction which is not consistent with this Plan or with any federal or state law regarding equal employment opportunity or affirmative action.

Identifies issues pertaining to the implementation and monitoring of compliance with this Plan and if necessary, brings those issues to the attention of Senior Vice President & General Manager and/or responsible executives.

Serves as liaison between Company and Illinois and federal regulatory agencies with respect to affirmative action/equal employment opportunity.

Serves as a liaison between the company and community organizations concerned with employment opportunities for minorities, women and persons with disabilities, community action groups and community service programs.

Establishes ongoing relationships with recruiting sources.

Establishes relationships with minorities and women's organizations, organizations for persons with disabilities, community groups and leaders, secondary schools and colleges, and builds relationships with their administration especially at minority dominated schools, and Illinois employment agencies.

Keeps the company's management informed of the latest AA/EEO developments.

Receives complaints from employees regarding discrimination and harassment and is also responsible for investigation and action on the complaint if warranted.

III. WORK FORCE COMPOSITION

The present work force composition of the company is categorized in accordance with the job classification established by the U.S. Equal Employment Opportunity Commission. The Company will cooperate with the IGB and any other governmental agency having jurisdiction as requested from time to time to the extent of furnishing such information as is available regarding the operations workforce in order for those agencies to perform such statistical studies of the composition of the workforce that those agencies deem appropriate.

IV. DESCRIPTION OF SPECIFIC ACTION STEPS

In order to recruit, train and upgrade minorities in all employment classifications, the company shall take the following steps:

1. Utilize objective selection tools that evaluate a candidate's potential for success in a position.
2. Utilize a job posting system which communicates growth opportunities to all employees.
3. Advertising employment opportunities with diverse readership as well as minority specific readership.
4. Require on-site recruiters to provide a diversified job slate when providing candidates to a hiring manager.
5. On-site job fairs that are open to the public focusing on assisting candidates in understanding the roles of different positions available.
6. Attendance at external job fairs which are advertised to all groups.

7. Network with key minority leaders to obtain referrals of qualified candidates.
8. Utilize an employee referral program that rewards all employees who refer candidates that are hired.
9. Total compensation program that is designed to pay for performance.
10. Applicant/employee awareness letter of EEO. Appendix A.
11. Employees are required to attend New Hire Orientation to receive an overview of culture diversity, customer service initiatives and employee benefits. Course curriculum is attached hereto as Appendix B.
12. Employees are required to attend Safety/Security Orientation to receive an overview of the safety & security policies and procedures. Course curriculum is attached hereto as Appendix B.
13. Employees are required to attend Responsible Gaming to receive information on how to identify a customer with a gambling problem. Course curriculum is attached hereto as Appendix B.
14. Employees are required to attend Controlling Alcohol Risks Effectively. Course curriculum is attached hereto as Appendix B.
15. Employees are required to attend the Preventing Workplace Harassment course, course curriculum is attached hereto as Appendix B.
16. Employees are required to complete annual Online Regulatory & Compliance Training Programs on Responsible Gaming and Information Security. Course curriculum is attached hereto as Appendix B.
17. All Supervisors and above titled employees are required to complete Online Regulatory & Compliance Training Programs on Preventing Workplace Harassment and Compliance & Ethics.
18. All newly promoted or hired Supervisors and above titled employees are required to complete New Leader Onboarding. Course curriculum is attached hereto as Appendix B.
19. All Supervisors and above titled employees are required to complete Legendary Leadership Essentials training on all levels of the coaching principles applied at Caesars Entertainment. Course curriculum is attached hereto as Appendix B.
20. Skillsoft is an online educational platform available for all employees. They are able to work at their own pace. Course curriculum is attached hereto as Appendix B.
21. Departmental Specific Training and Future Training Opportunities are available for all employees to develop in their job responsibilities. Course curriculum is attached hereto as Appendix B.
22. Employee Exploring Supervisor Opportunities (ESO) is a training course for employees who are interested in becoming a supervisor. Course curriculum is attached hereto as Appendix B.
23. Tuition Reimbursement Program is available to employees who wish to continue their college education. Course curriculum is attached hereto as Appendix B.

24. Provide female friendly work environment through encouraging and accepting flexible work hours.

V. AFFIRMATIVE ACTION FOR PERSONS WITH DISABILITIES

The Company complies with the Americans with Disabilities Act and provides equal opportunity to all qualified applicants and employees. If an applicant meets the qualifications established for a position with the company and can perform the essential functions of the job with or without a reasonable accommodation, the applicant will be considered for employment. If an applicant with a disability informs the Human Resources Department that he/she would need an accommodation to participate in the application process or to perform initial functions of the job, or to otherwise receive equal benefits, privileges of an employment, the Human Resources Department will document the requested accommodation on the interview evaluation. If a qualified individual with a disability discusses the need for an accommodation with a manager/supervisor (but not with HR) the manager/supervisor must notify Human Resources of the information. Human Resources will review and determine if a reasonable accommodation can be made, propose accommodation, or make the determination that a reasonable accommodation does not exist. Throughout the process, which will be an interactive one with the employee, the Company will use a problem-solving approach in order to identify and implement an accommodation that is most appropriate for the employer and the prospective employee.

Whenever an applicant with a known disability has been interviewed, the hiring manager/supervisor should contact the Human Resources Department prior to extending an employment offer to ensure a fair decision and so that proper documentation may be completed (that is, documentation as to why the candidate was selected over another, for example previous related experience, skill level or education). If any information regarding an applicant's medical condition or history is acquired as a result of the accommodation process, such information shall be maintained in a separate medical file and treated as confidential medical records, except that supervisors and managers may be informed regarding necessary restrictions and first aid and safety personnel may be informed, when appropriate.


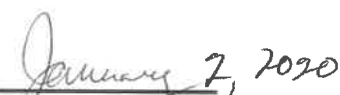
VI. AA/EEO GRIEVANCE RESOLUTION PROCESS

The Company is committed to a workplace free of discrimination and harassment and consequently is committed to receive, investigate and respond appropriately to all employee complaints of such. It will be the responsibility of the EEO officer to ensure that all employee complaints of discrimination, sexual or other improper harassment, or other hostile work environment issues are investigated thoroughly and completely, and are responded to in a timely manner, and appropriate corrective action taken decisively and quickly. The Company being an affiliate of Caesars Entertainment Corporation, formerly Harrah's

Entertainment, Inc., the Harrah's corporate guidelines for investigation of harassment complaints will be followed. The Harrah's corporate policy is attached hereto as Appendix E.

VII. SELF-MONITORING PROCESS

The AA/EEO Committee will meet quarterly to review implementation and effectiveness of the Plan and to amend the plan should the need for such amendment in the Committee's judgment arise. The Director of Human Resources and EEO Officer will act as Secretary of the Committee and will keep documented progress of minority and female hiring statistics.

 158561 

Norris Hamilton Date
Senior Vice President & General Manager

 01/02/2020

Christina Krakowsky Date
Director of Human Resources

APPENDIX LISTING

<u>APPENDIX</u>	<u>ITEM DESCRIPTION</u>
A	Applicant/Employee Awareness Letter
B	Training Programs Available to all Harrah's Employees.
C	Harrah's Anti-Harassment Policy



MEMORANDUM

TO: All Harrah's Joliet Casino & Hotel Employees

FROM: Norris Hamilton, SVP & General Manager

DATE: January 1, 2020

RE: Affirmative Action Plan

At Harrah's we are committed to certain principles in support of our Social Investment Plan, as well as, our corporate policy. To strengthen our commitment, these same objectives have been submitted to the Illinois Gaming Board.

In an effort to make these ideals a reality, we have formulated an Affirmative Action/Equal Employment Opportunity Plan. The plan will be implemented by an Equal Employment Opportunity Committee, including myself, Christina Krakowsky (Director of Human Resources/EEO Officer), Rachael Bartolini (Vice President of Finance and Administration) and Greg Sitar (Director of Casino Operations).

The Plan will allow us to formalize our efforts in ensuring equal employment opportunities for all present and prospective team members at every level of the organization. Additionally, the plan will allow us to ensure employee complaints of discrimination and harassment are promptly investigated and addressed, while also furthering our efforts of ensuring a diverse and harmonious work place.

Pursuant to the Plan, we will ensure that women, minorities and persons with disabilities are recruited and employed at all levels of our operational work force. We will also work to ensure all employees are treated equally during their employment without regard to their gender, race, ethnic group, disability or sexual orientation. Should you have a complaint, I assure you that your concern will be promptly, thoroughly and professionally investigated. At which time, appropriate action will be taken to address your complaint, should it be warranted.

I anticipate everyone's complete support and cooperation in the implementation of the Plan and invite you to direct any questions about the Plan to the Director of Human Resources, or any Human Resources representative.

Best Regards,

A handwritten signature in black ink, appearing to read "Norris Hamilton", written over a light blue horizontal line.

Norris Hamilton
Senior Vice President & General Manager

Appendix A

APPENDIX B

Training and Development

New Hire Orientation

- Employees receive training on the reasons for, and the results of, superior customer service behaviors and actions. Employees receive an overview during new hire week which includes:
 - *What is our mission, vision and values*
 - *Why we are committed to our customer, communities and employees*
 - *What is the service culture and why is it important*
 - *What are the expected behaviors, their importance, and how to exhibit the behaviors:*
 - *Cultural Diversity*
 - *Customer Service/Satisfaction initiatives*
 - *Benefits*

Safety/Security Orientation

- Employees receive an overview of the following information:
 - *Risk control policy and procedure*
 - *Location of emergency treatment and first aid*
 - *Proper Lifting*
 - *General Security Procedures*
 - *Reporting unsafe conditions*
 - *Hazard communication program explained*
 - *Lock-out / tag-out*
 - *Blood borne pathogens*
 - *Seasonal, Avian, Pandemic, and Influenza overview*

Responsible Gaming

- Employees receive information on the following topic areas which include:
 - *Why responsible gaming is important to our industry*
 - *How to identify a person that is not gambling responsibly*
 - *What to do when you have identified a person that may not gamble responsibly*
 - *How should you report the information when you suspect someone has a gambling problem*
 - *The roles of the employee, the supervisor, manager, and responsible gaming ambassador*

Controlling Alcohol Risks Effectively

- Employees hired into certain positions are required to successfully complete the course. The course illustrates the following:
 - *The laws governing the service of alcohol*

APPENDIX B

Controlling Alcohol Risks Effectively (cont'd)

- *The establishments policies and procedures*
- *How to spot false identification*
- *How alcohol works in and affects the body*
- *How to use the traffic light system to monitor and control consumption by our guests*
- *How to intervene tactfully with guests to prevent possible problems*

Preventing Workplace Harassment

- Required for all supervisors and above within six months of hire, and must recertify annually.
 - *Online course that includes numerous exercises to help supervisors and managers explore the nuances of what harassment is - and is not.*
 - *Each section of the course is structured around scenarios that depict common and complicated work situations that require the manager or supervisor to react.*
 - *Key issues raised by the scenarios are discussed, providing guidance on the factors that contribute to harassment and the types of behavior that are potentially problematic*
- Hourly employees receive course summary during new hire week which contains the following topics:
 - *What is Sexual Harassment?*
 - *What do you do if you feel you are a victim of Sexual Harassment*
 - *Examples of Sexual Harassment*
 - *Potential Damages*
 - *Video and Discussion of examples*
 - *Components of Effective Workplace Policy*
 - *Read and sign Harrah's Anti Harassment Policy*

Online Regulatory & Compliance Trainings

- Required for all Supervisors and above annually.
- Comprehensive on-line courses that assist leaders in learning how to apply fair, legal, and ethical practices to situations they face.
- Emphasis is placed on:
 - *Preventing Workplace Harassment*
 - *Responsible Gaming*
 - *Compliance & Ethics*
 - *Information Security*

APPENDIX B

New Leader Onboarding

- Required for all newly promoted or hired Supervisors and above.
- Combination of comprehensive on-line courses (Diversity & Inclusion, Compliance & Ethics, Preventing Workplace Harassment, Performance Documentation) and 1-on-1 meetings that assist new leaders in successfully onboarding into their roles.

Legendary Leadership Essentials

- Required for all Supervisors and above.
- Comprehensive classroom training facilitated by a corporate certified trainer that teaches leaders of all levels the coaching principles applied at Caesar's Entertainment.
- Emphasis is placed on:
 - *Get Me*
 - *Guide Me*
 - *Root For Me*

Skillsoft

- All employees are able to subscribe to online educational classes that are all self paced and range from Management skills to computer usage. Course groups include:
 - *Business Skills*
 - *Desktop*
 - *Safety*

Departmental Specific Training

- Each department has specific training education that is specific to their areas such as:
 - Sanitation training
 - Anti-Money Laundering
 - Fire egress training
 - Safety training
 - Equipment Safety training
 - PSTN 6 hour Security Training Series

Exploring Supervisory Opportunities (ESO)

- Program designed for employees who are interested in becoming Supervisors.
- Program modules include:
 - Readiness Profile
 - Job Shadowing
 - Online Supervisor behavioral assessment

APPENDIX B

Future Training

- The following education and training will either be formulated or enhanced for the future;
 - Mentoring
 - Coaching
 - Public speaking & presentation skills

Tuition Reimbursement Program

- Employees are able to apply for our educational assistance program which will reimburse up to 90% of tuition costs with a maximum of \$3,000 for undergraduate studies, and \$4,000 for graduate studies per year.

APPENDIX C: ANTI-HARASSMENT POLICY

POLICY AGAINST DISCRIMINATION, HARASSMENT AND RETALIATION

The Company is committed to providing a work environment that is free from all forms of discrimination, harassment, or retaliation for opposing such conduct. Discrimination or harassment based upon the following Company or legally protected characteristics (“Protected Characteristics”) will not be tolerated: race, color, national origin, ancestry, citizenship status, religion, creed, sex, gender (including gender identity and gender expression), pregnancy (including childbirth and related medical conditions), age (as defined under applicable law), physical or mental disability, sexual orientation, genetic information, veteran or military status (including unfavorable discharge from military), marital status, order of protection status, or on the basis of any other characteristic protected by applicable federal, state or local laws.

This policy applies to everyone in the workplace, including officers, managers, supervisors, co-workers and third parties not employed by the Company, such as non-Team Member visitors, vendors, consultants and guests/customers. For example, this policy applies to non-employees in the workplace who are directly performing services for the Company, including contractors and consultants. This policy also applies to conduct by customers or guests that is directed at employees.

This policy applies to any discriminatory or harassing conduct in the working environment, whether occurring in the workplace or while engaging with coworkers outside the workplace, including, but not limited to, Company-related activities such as during business trips, offsite meetings or Company-sponsored social events.

Discrimination or harassment of employees or applicants because they are members of, affiliated with or perceived to be members of any of the Protected Classifications is prohibited.

The Company believes that every employee has the right to work in an environment free of discrimination, harassment and retaliation. Therefore, the Company sets a standard of conduct that is higher than what federal, state, or local laws may require, because it prohibits conduct of the kind described in this policy even if the conduct does not violate a federal, state, or local law.

Discrimination generally means treating differently or denying or granting a benefit to an individual because of the individual’s protected characteristic.

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of a Protected Characteristic or that creates an intimidating, hostile or offensive working environment that interferes with work performance.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, objects, cartoons, drawings, graffiti, computer displays, text messages, social media posts or e-mails) or physical (including physically threatening another, blocking someone’s way, etc.).

Sexual Harassment Defined

Sexual harassment is a special form of sex-based harassment that includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual; or,
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

An employee's "working environment" is not limited to the physical location an employee is assigned to perform his or her duties.

The following are examples of sexual harassment:

- Unwanted sexual advances/propositions in any form, including verbal, written and electronic;
- Unwanted and persistent romantic advances/propositions;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons, posters or graffiti;
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about a co-worker's body or dress;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes or invitations;
- Physical conduct: touching, assault, impeding or blocking movements.

Both victim and harasser can be either a woman or a man, and the victim and harasser can be the same sex. The harasser can be the victim's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer, such as a client or customer.

Other Types of Harassment

As stated above, discrimination or harassment based on *any* Protected Characteristics is also prohibited. Examples of prohibited discrimination or harassment when aimed at or based on a Protected Characteristic include, but are not limited to, the following:

- Verbal conduct including threats, jokes, epithets, derogatory comments or slurs;
- Visual conduct including derogatory posters, photography, cartoons, drawings, emails, websites, gestures or graffiti;
- Physical conduct including assault, unwanted touching or blocking normal movements.

Internal Complaint Procedure

If you believe that you, one of your co-workers or another other individual in the working environment has been the victim of prohibited discrimination or harassment, you should promptly notify, either verbally or in writing, any of the following: (1) your department supervisor or manager; (2) Human Resources for your property; (3) on-site security; (4) corporate Human Resources; or (5) the Ethics and Compliance Hotline. Employees who witness or experience any discriminatory or harassing behavior are expected to report such behavior immediately. Any supervisors or managers who receive any complaints of discriminatory or harassing conduct, or otherwise witness or become aware of conduct that appears to violate this policy, must report the conduct, either verbally or in writing, to corporate Human Resources immediately.

The Company will investigate all complaints thoroughly, promptly and fairly. Upon conclusion of the investigation, the Company will take appropriate action against those found to have violated Company policies, up to and including the termination of employment. The Company will keep complaints and the resolution of such complaints confidential to the extent practicable, subject to its practice of conducting an appropriate investigation and taking appropriate action. Supervisors or managers who are aware of conduct in violation of this policy and fail to report it will be subject to disciplinary action, up to and including the termination of employment.

External Complaint Procedures

Aside from the internal complaint process at the Company, employees are advised that the Illinois Human Rights Act and Title VII of the Civil Rights Act of 1964 provide additional protections against sexual harassment in the workplace. Employees may choose to file a charge of discrimination or harassment, including sexual harassment, with the Illinois Department of Human Rights (“IDHR”) or the U.S. Equal Employment Opportunity Commission (“EEOC”). Employees may contact and file charges with those agencies using the following information.

For the IDHR, IDHR.Intake@illinois.gov or either of these offices:

Chicago Office 100 W. Randolph St., 10th Floor Chicago, IL 60601 (312) 814-6200 (866) 740-3953 (TTY) (312) 814-6251 (Fax)	Springfield Office 535 W. Jefferson Street, 1 st Floor Springfield, IL 62702 (217) 785-5100 (866) 740-3953 (TTY) (217) 785-5106 (Fax)
--	---

For the EEOC:

Chicago District Office
JCK Federal Building
230 S Dearborn Street, Suite 1866
Chicago, IL 60604
Phone: 1-800-669-4000
Fax: 312-588-1260
ASL Video Phone: 844-234-5122
<https://publicportal.eeoc.gov/portal/>

Retaliation is Prohibited

It is a violation of Company policies to retaliate against anyone for making a complaint of discrimination or harassment, including sexual harassment. Similarly, retaliation against anyone participating in the Company’s investigation of a complaint is strictly prohibited. If you feel that you have been retaliated against for making or assisting in the investigation of a complaint or otherwise, you should promptly notify any of the following:

- (1) your department supervisor or manager;
- (2) Human Resources for your property;
- (3) corporate Human Resources; or,
- (4) the Ethics and Compliance Hotline.

Any complaint of retaliation will be investigated, and appropriate corrective action will be taken where it is warranted, up to and including the termination of employment.

Mandatory Sexual Harassment Prevention Training

The Company requires that all employees participate in sexual harassment prevention training at least once per year. This policy is available in English and Spanish, and may be available in other languages.

Employees at Hotels and Casinos

The Illinois Hotel and Casino Employee Safety Act (the "Safety Act") provides additional protections for the Company's hotel and casino employees.

Employees of the Company who are assigned to work in a guest room, restroom, or casino floor under circumstances where no other employee is present in that room or area will be provided with a safety device or notification device that can be used to summon help if the employee reasonably believes that an ongoing crime, sexual harassment, sexual assault, or other emergency is occurring in the employee's presence.

All such employees are encouraged to immediately report to the Company any instance of alleged sexual assault or sexual harassment by a guest. Such reports should be submitted pursuant to the Company's internal complaint procedures as set forth above. In cases of emergency, employees should utilize their safety/notification device, and/or call on-site security or police, as the situation warrants.

Employees who have experienced instances of sexual assault or sexual harassment by a guest should cease work and leave the immediate area where danger is perceived until Company security personnel or police arrive to provide assistance. The Company will provide temporary work assignments to the complaining employee during the duration of the offending guest's stay at the property, which may include assigning the complaining employee to work on a different floor or at a different station or work area away from the offending guest.

The Company will provide the complaining employee with necessary paid time off to: (1) file a police report or criminal complaint with the appropriate local authorities against the offending guest and (2) testify as a witness at any legal proceeding that may ensue as a result of the criminal complaint filed against the offending guest, if the complaining employee is an employee of the Company at the time the legal proceeding occurs.

The Company supports your right to report sexual harassment without fear of retaliation. The Safety Act makes it illegal for an employer to retaliate against any employee who: (1) reasonably uses a safety device or notification device; (2) in good faith avails himself or herself of the opportunity to cease work and leave the immediate area where danger is perceived, accepts a temporary work assignment during the duration of the offending guest's stay or accepts paid time off to file a police report or testify in a related proceeding; or (3) discloses, reports, or testifies about any violation of the Safety Act or rules adopted by the State of Illinois related to the Safety Act.

This policy is not intended to restrict conduct related to terms and conditions of employment or related to concerted mutual aid and protection. The Company will not construe or apply this policy in a manner that improperly interferes with or limits its employees' rights under the National Labor Relations Act.

**Actual Expenditures
Jan 1 2020 - Nov 30 2020**

	TOTAL		GOAL	Total Number of Businesses
Total Expenditures	9,971,063			
DBE of Total Expenditures	45,954	0.5%	0.5%	4
MBE of Total Expenditures	441,349	4.4%	25%	25
WBE of Total Expenditures	259,563	2.6%	5%	19
VBE of Total Expenditures	85,894	0.9%	1%	2
Total Diverse Expenditures	832,760	8.4%		50

UTILIZATION

	Jan 1 2020 - Nov 30 2020			
	MBE Vendor	WBE Vendor	DBE Vendor	VBE Vendor
Equipment - Gaming				
Supplies - Gaming		16,433		
Total Gaming Related Supplies & Equipment	0	16,433	0	0
Equipment - Non Gaming	3,296	3,964		
Supplies - Non Gaming	60,170	71,042		
Total Non-Gaming Related Supplies & Equipment	63,466	75,006	0	0
Entertainment		12,250		
Professional Services	109,975			
Transportation				
Marketing	223,151	126,371	1,000	85,894
Other Services	19,446	15,174	8,447	
Total Services & Contractual	352,572	153,795	9,447	85,894
Food & Beverage	19,375	4,687		
Other		1,362		
Property Improvements & Capital Maintenance	5,935	8,280	36,507	
Total	441,348	259,563	45,954	85,894

**Including December Forecasts
(Additional Invoices that should be paid by end of year)**

	TOTAL	Grand Total	
Total Expenditures	10,271,063		
	Dec Forecast	Jan - Dec	
DBE of Total Expenditures	-	45,954	0.4%
MBE of Total Expenditures	1,813	443,162	4.3%
WBE of Total Expenditures	265	259,828	2.5%
VBE of Total Expenditures	-	85,894	0.8%
Total Diverse Expenditures	2,078	834,838	8.1%

Forecast Dec 1 2020 - Dec 31 2020

	MBE Vendor	WBE Vendor	DBE Vendor	VBE Vendor
	0	0	0	0
		115		
	0	115	0	0
		150		
	0	150	0	0
	1,813			
	1,813	265	0	0

2020 FORECASTED ANNUAL REPORT – HARRAH’S JOLIET VENDOR DIVERSITY

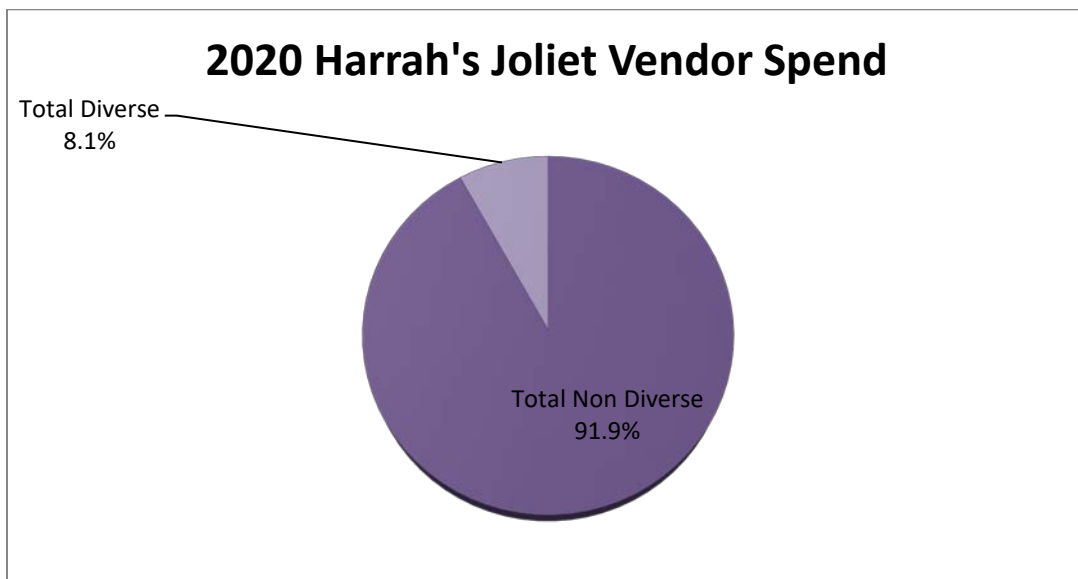
Overview

The aggregate percentages of diversity vendor spend compared to total expenditures in 2020 was 8.1% based on actual expenditures through November 30th 2020 and the remainder of the year forecasted. Diverse vendor inclusion is a high priority for Harrah’s Joliet, and to its parent company, Caesars Entertainment. Harrah’s Joliet continues to diversify our supplier base and procurement spend with minority owned, women-owned, disabled-owned and veteran-owned business enterprises.

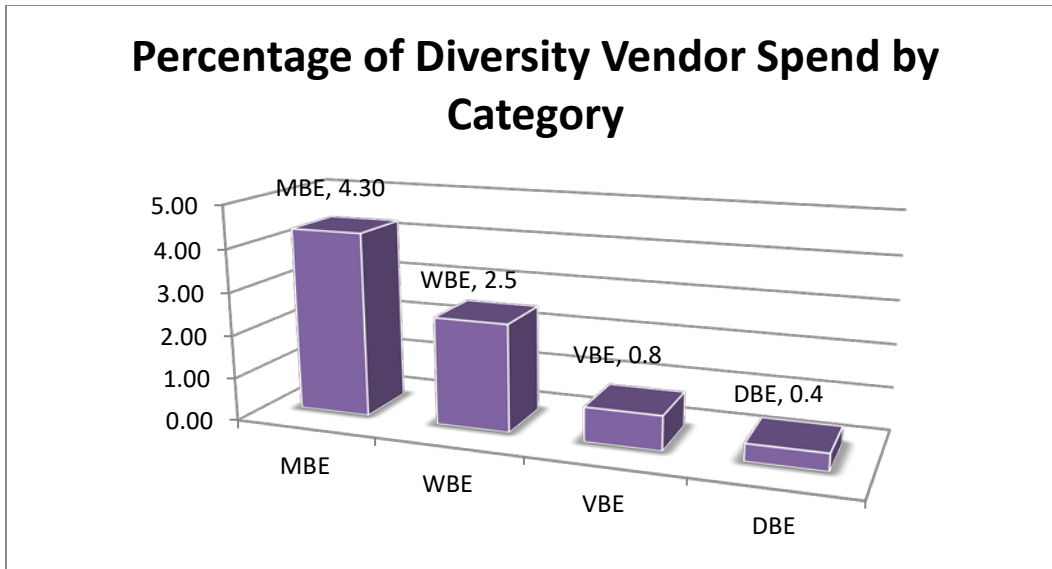
Diversity Statement

Caesars Entertainment and its properties work to achieve diversity and inclusion by striving to attain both equity and equality within our corporation and with all the suppliers with whom we work. We are committed to procuring our products and services from a diversified pool of vendors, contractors and professional services providers. We are also committed in working with developing businesses to help them build capacity.

2020 Vendor Diversity Results



Spend with diversity vendors at Harrah’s Joliet were 8.1% of total spend in 2020.



Our percentages of diversity spend by category is as follows: Minority-owned businesses (MBE) spend represents 4.3%, Woman-owned businesses (WBE) spend represents 2.5%, Disabled-owned businesses (DBE) spend represents 0.4%, and Veteran-owned businesses (VBE) represents 0.8% of the total 2020 spend. Due to the current pandemic, Harrah's Joliet was closed from March 16th, 2020 through June 30th, 2020 which significantly impacted our total spend. Once we were able to reopen our operations in July with the new restrictions in place, our total spend continued to be less than previous years. When business resumed, we made every effort to continue to use diverse vendors including using them for some PPE products. The property had to close again beginning November 20th through the remainder of the year, which further reduced our total spend.

Outreach

Through outreach efforts in 2020 and partnering with certifying organizations Harrah's Joliet is committed to working with more diverse vendors to assist in increasing our diverse spend. Below is a listing of the 2020 events for which Caesars and its properties attended or hosted on a local, regional and national level:

<u>Dates</u>	<u>Event Title</u>	<u>Location</u>
March 2-5	National Reservation Economic Summit	Las Vegas
July 13-17	Disability: IN	Virtual

August 5-6	Chicago MSDC	Virtual
September 27-29	USHCC: United States Hispanic Chamber of Commerce	Virtual
October 13	WBENC (Women's Business Enterprise National Council) and Target	Virtual
October 14-16	United States Black Chamber of Commerce	Virtual
October 25-28	NMSDC (National Minority Supplier Development Council)Conference	Virtual
November 5-6	NMSDC (National Minority Supplier Development Council)Matchmaker	Virtual
November 18	Hollywood Casino Vendor Fair/Webinar	Virtual

Looking Forward

We are excited to work on increasing diversity spend percentages in 2021 and beyond. We will continue to attend outreach events virtually, and partnering with organizations like CMSDC, WBENC, Disability: IN, and NaVOBA. With these partnerships we can identify more suppliers who can provide products or services for Harrah's Joliet.

Conclusion

Harrah's Joliet, and its parent, Caesars Entertainment, are firmly committed to making continuous improvement finding and utilizing diverse vendors. Both our property-specific internal procurement processes and our corporate diverse vendor strategic initiatives allow diverse vendors a great opportunity to grow their businesses and prosper. 2020 has been a challenging year for all, but we were still able to allocate 8.1% of our spend to diverse vendors and we are hopeful that 2021 spend will reach the levels of previous years prior to the pandemic.

2020 ANNUAL REPORT - HARRAH'S METROPOLIS VENDOR DIVERSITY

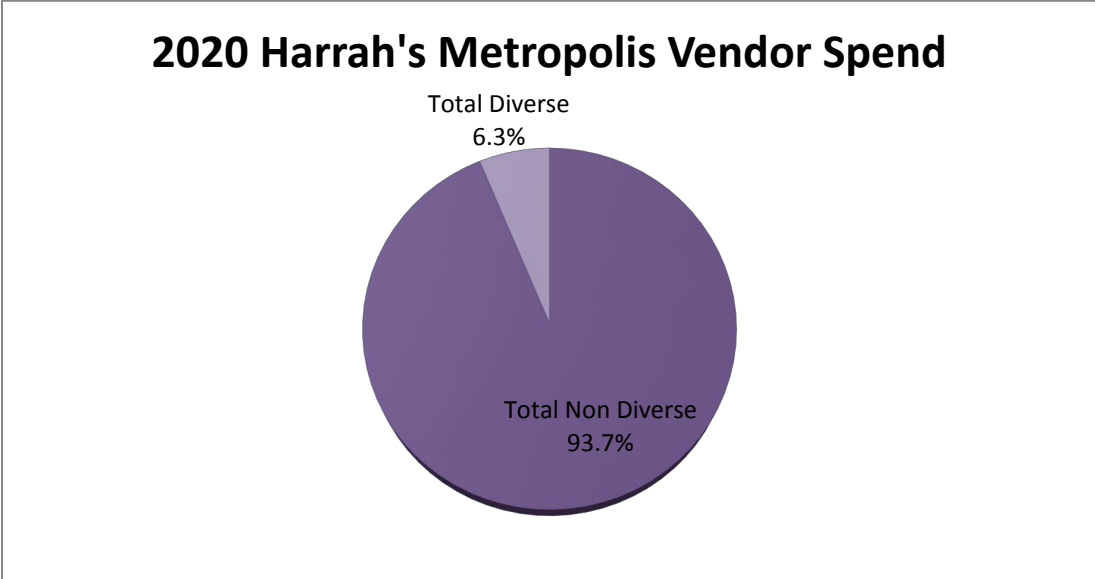
Overview

The aggregate percentages of diversity vendor spend compared to total expenditures in 2020 was 6.3%. Diverse vendor inclusion is a high priority for Harrah's Metropolis, and to its parent company, Caesars Entertainment. Harrah's Metropolis continues to diversify our supplier base and procurement spend with minority owned, women-owned, disabled-owned and veteran-owned business enterprises.

Diversity Statement

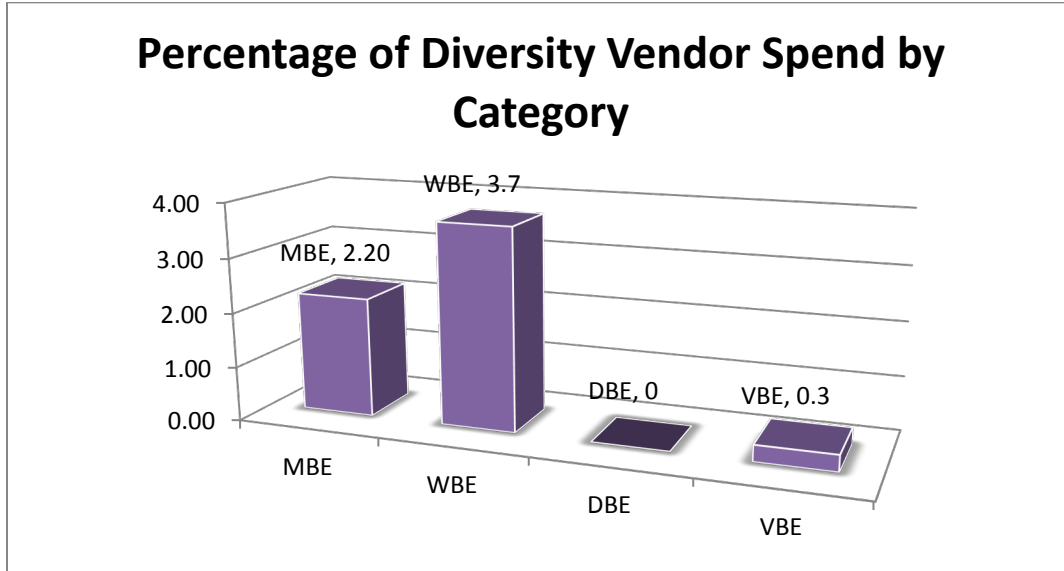
Caesars Entertainment and its properties work to achieve diversity and inclusion by striving to attain both equity and equality within our corporation and with all the suppliers with whom we work. We are committed to procuring our products and services from a diversified pool of vendors, contractors and professional services providers. We are also committed in working with developing businesses to help them build capacity.

2020 Vendor Diversity Results



Our percentage of Diversity spend by category is as follows:

- Minority-owned businesses (MBE) spend represents 2.2%
- Woman-owned businesses (WBE) spend represents 3.7%
- Disabled-owned businesses (DBE) spend represents 0.0 %
- Veteran-owned businesses (VBE) spend represents .3%



Outreach

Through outreach efforts in 2020 and partnering with certifying organizations Harrah’s Metropolis is committed to working with more diverse vendors to assist in increasing our diverse spend.

Below is a listing of the 2020 events for which Caesars and Its properties attended on a local, regional and national level:

<u>Dates</u>	<u>Event Title</u>	<u>Location</u>
March 2-5	National Reservation Economic Summit	Las Vegas
July 13-17	Disability: IN	Virtual
August 5-6	Chicago MSDC	Virtual
September 27-29	USHCC: United States Hispanic Chamber of Commerce	Virtual
October 13	WBENC (Women's Business Enterprise National Council) and Target	Virtual
October 14-16	United States Black Chamber of Commerce	Virtual
October 25-28	NMSDC (National Minority Supplier Development Council)Conference	Virtual
November 5-6	NMSDC (National Minority Supplier Development Council)Matchmaker	Virtual
December 15-16	2020 Illinois State Black Chamber of Commerce Annual Conference	Virtual

Looking Forward

We are excited to work on increasing diversity spend percentages in 2021 and beyond. We will continue to attend virtual events, and partnering with organizations like CMSDC, NMSDC, WBENC, DISABILITY:IN, and NaVOBA. With these partnerships we can identify more suppliers who can provide products or services for Harrah's Metropolis.

Conclusion

Harrah's Metropolis, and its parent, Caesars Entertainment, are firmly committed to making continuous improvements, finding and utilizing diverse vendors. Both our property-specific internal procurement processes and our corporate diverse vendor strategic initiatives allow diverse vendors a great opportunity to grow their businesses and prosper. 2020 has brought us many unique challenges but we will continue to look for ways to support diverse business.

Harrah's Metropolis

Actual Expenditures

Jan 1st 2020- Nov 30th 2020

Jan 1 2020-Nov 30 2020

	TOTAL		GOAL	Total Number of Businesses
Total Expenditures	7,554,772			
DBE of Total Expenditures	2,560	0.0%	1.0%	4
MBE of Total Expenditures	167,912	2.2%	15%	15
WBE of Total Expenditures	278,527	3.7%	17%	25
VBE of Total Expenditures	25,269	0.3%	1%	4
Total Diverse Expenditures	474,268	6.3%	34.0%	48

Jan 1 2020 - Nov 30 2020

	MBE Vendor	WBE Vendor	DBE Vendor	VBE Vendor
Equipment - Gaming	0	0	0	0
Supplies - Gaming	3,527	14,886	0	0
Total Gaming Related Supplies & Equipment	3,527	14,886	0	0
Equipment - Non Gaming	0	3,964	0	0
Supplies - Non Gaming	21,913	66,020	0	0
Total Non-Gaming Related Supplies & Equipment	21,913	69,984	0	0
Entertainment	0	0	0	0
Professional Services	0	1,162	0	0
Transportation	0	0	0	0
Marketing	114,971	179,638	0	25,269
Other Services	3,008	0	2,560	0
Total Services & Contractual	117,979	180,800	2,560	25,269
Food & Beverage	55	379	0	0
Other	0	3,339	0	0
Property Improvements & Capital Maintenance	24,439	9,140	0	0
Total	167,912.00	278,527.00	2,560.00	25,269.00

Including December Forecasts

(Additional Invoices that should be paid by end of year)

	TOTAL	Grand Total	
Total Expenditures	7,600,622	Jan - Dec	
DBE of Total Expenditures	-	2,560	0.0%
MBE of Total Expenditures	1,500	169,412	2.2%
WBE of Total Expenditures	2,000	280,527	3.7%
VBE of Total Expenditures	-	25,269	0.3%
Total Diverse Expenditures	3,500	477,768	6.3%

Forecast Dec 1 2020 - Dec 31 2020

	MBE Vendor	WBE Vendor	DBE Vendor	VBE Vendor
			0	0
	3,527	14,886	0	0
	3,527	14,886	0	0
		3,964	0	0
	21,913	66,020	0	0
	21,913	69,984	0	0
	0	0	0	0
	0	1,162	0	0
	0	0	0	0
	115,971	181,638	0	25,269
	3,508	0	2,560	0
	119,479	182,800	2,560	25,269
	55	379	0	0
	0	3,339	0	0
	24,439	9,140	0	0
	169,412.00	280,527.00	2,560.00	25,269.00

HARRAH'S METROPOLIS CASINO & HOTEL

2020-2021 AFFIRMATIVE ACTION / EQUAL EMPLOYMENT OPPORTUNITY PLAN

I. INTRODUCTION

This affirmative action / equal employment opportunity plan document has been promulgated and adopted by Southern Illinois Riverboat Casino/Cruises, LLC, DBA Harrah's Metropolis Casino (hereinafter referred to as "the Company") for the purpose of compliance with the requirements of 230 ILCS 10/7(b)(4) which provides in pertinent part that in determining whether to grant an owner's license, the Illinois Gaming Board ("IGB") shall consider the good faith affirmative action plan of each applicant to recruit, train and upgrade minorities in all employment classifications.¹ This plan is subject to all applicable state and federal laws including but not limited to Title VII of the Civil Rights Act of 1964. The purpose of this Plan document is to formalize the Company's efforts to promote and maintain a diverse work environment, one free from discrimination or harassment of any kind. This formalization includes but is not limited to:

1. Assignment of specific responsibilities for Plan compliance;
2. Adoption of procedures for receiving, investigating and responding to employee complaints of discrimination or harassment;
3. Adoption of specific tactics to meet affirmative action / equal employment opportunity obligations including outreach and recruitment;
4. Periodic review of the Company's Plan compliance by the Affirmative Action / Equal Employment Opportunity Committee;
5. Communication of affirmative action / equal employment opportunity efforts to employees.

The provisions of this Plan are subject at all times to the governing principle that in all employment decisions, the Company shall make all selections in a non-discriminatory manner. The Plan is not intended, nor should it be used as a justification to extend a preference to any individual, or to select an individual or adversely affect an individual's employment status on the basis of that person's race, color, religion, creed, sex, gender (including gender identity and gender expression), pregnancy (including childbirth and related medical conditions), age

¹ Neither the term "minorities" nor "employment classification" is defined in the statute or in the regulations of the IGB. Therefore, the Company understands and will utilize these terms in accordance with the definitions of these respective terms set forth in the rules and guidelines of the United States Equal Employment Opportunity Commission.

(as defined under applicable law), national origin or ancestry, physical or mental disability, sexual orientation, genetic information, veteran or military status or any other consideration protected by applicable federal, state or local laws. Furthermore, this plan is not intended to require, cause or influence any supervisor or manager to consider any factor other than the individual qualifications of the person under consideration for hiring or promotion when making any personnel decision.

I. POLICY STATEMENT AND DISSEMINATION TO EMPLOYEES

The licensee's policy statement with regard to affirmative action/equal employment opportunity is to be signed by the senior executive of the Company, being the Senior Vice President and General Manager, and is attached hereto as Appendix A. This policy will be disseminated to employees by way of the following mechanisms: periodic publication in employee newsletters and bulletins; posting in employee common areas; distribution in new hire orientation; distribution and discussion in periodic employee training.

II. DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION

The overall responsibility for implementation, monitoring and amendment (if necessary) of this Plan shall reside with the Affirmative Action / Equal Employment Opportunity Committee. The Committee shall be composed of the Senior Vice President and General Manager, Executive Committee, Human Resources Manager, Financial Controller and designated Equal Employment Opportunity Officer. The EEO Officer shall be primarily responsible for the day to day implementation of the Plan and will have the following responsibilities and authority:

Will have direct access to Senior Vice President and General Manager on affirmative action / EEO related matters.

Monitors and reviews all aspects of the personnel procedures and decisions of the Company.

Recommends in writing to the Senior Vice President and General Manager the suspension of any personnel procedure, decision or transaction which is not consistent with this Plan or with any federal or state law regarding equal employment opportunity or affirmative action.

Identifies issues pertaining to the implementation and monitoring of compliance with this Plan and if necessary, brings those issues to the attention of Senior Vice President and General Manager and/or responsible executives.

Serves as liaison between the Company and Illinois and federal regulatory agencies with respect to affirmative action / equal employment opportunity.

Serves as a liaison between the licensee and community organizations concerned with employment opportunities for minorities, women and persons with disabilities, community action groups and community service programs.

Establishes ongoing relationships with recruiting sources.

Establishes relationships with minorities and women's organizations, organizations for persons with disabilities, community groups and leaders, secondary schools and colleges and Illinois employment agencies.

Keeps the licensee's management informed of the latest AA /EEO developments.

Receives complaints from employees regarding discrimination and harassment and is also responsible for investigation and action on the complaint if warranted.

IV. WORK FORCE COMPOSITION

The present work force composition of the licensee broken down in accordance with the job classification established by the U.S. Equal Employment Opportunity Commission. The Company will cooperate with the IGB as requested from time to time to the extent of furnishing such information as is available regarding the operations workforce in order for the IGB to perform such statistical studies of the composition of the workforce that the IGB deems appropriate.

V. DESCRIPTION OF SPECIFIC ACTION STEPS

In order to recruit, train and upgrade minorities in all employment classifications, the licensee shall take the following steps:

1. Utilize objection selection tools that evaluate a candidate's potential for success in a position regardless of the candidate's background for employment and promotion.
2. Utilization of a job posting system which communicates growth opportunities to all employees.
3. On-site job fairs that are open to the public focusing on assisting candidates in understanding the roles of different positions available.
4. Attendance at external job fairs which are advertised to all groups.
5. Utilization of an employee referral program that rewards all employees who refer candidates that are hired.

6. Total compensation program that is designed to pay for performance.
7. Such other programs as the Company may implement as a result of continuing integration with Caesar's Entertainment, Inc. personnel policies and practices.
8. New hires are required to attend New Hire Orientation which includes a Diversity and Inclusion segment to further their understanding of a diverse work environment.

VI. AFFIRMATIVE ACTION FOR PERSONS WITH DISABILITIES

The Company complies with the Americans with Disabilities Act and provides equal opportunity to all qualified applicants and employees. If an applicant meets the qualifications established for a position with the licensee and can perform the essential functions of the job with or without a reasonable accommodation, the applicant will be considered for employment. If an applicant with a disability informs Human Resources that he/she would need an accommodation to participate in the application process or to perform initial functions of the job, or to otherwise receive equal benefits, privileges of an employment, the Human Resources Department will document the requested accommodation on the interview evaluation. If a qualified individual with a disability discusses the need for an accommodation with a manager/supervisor (but not with HR) the manager / supervisor must notify Human Resources of the information. Human Resources will either, grant the requested accommodation, propose another reasonable accommodation, or make the determination that a reasonable accommodation does not exist. Throughout the process, which will be an interactive one with the employee, the Company will use a problem-solving approach in order to identify and implement an accommodation that is most appropriate for the employer and employee.

Whenever an applicant with a known disability has been interviewed, the hiring manager / supervisor should contact the Human Resources Department prior to extending an employment offer to ensure a fair decision and so that proper documentation may be completed (that is, documentation as to why the candidate was selected over another, for example previous related experience, skill level or education). If any information regarding an applicant's medical condition or history is acquired as a result of the accommodation process, such information shall be maintained in a separate medical file and treated as confidential medical records, except that supervisors and managers may be informed regarding necessary restrictions and first aid and safety personnel may be informed, when appropriate.

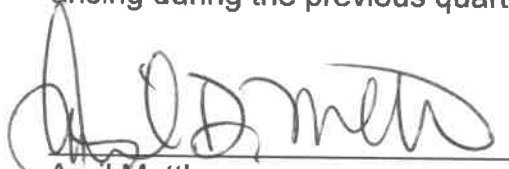
VII. AA / EEO GRIEVANCE RESOLUTION PROCESS

The Company is committed to a work place free of discrimination and harassment and consequently is committed to receive, investigate and respond appropriately to all employee complaints of such. The Company Policy with the

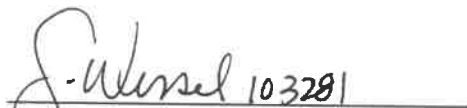
caveat that it applies to alleged racial, ethnic disability based harassment to the same extent as sexual harassment. It will be the responsibility of the EEO officer to ensure that all employee complaints of discrimination, sexual or other improper harassment, or other hostile work environment issues are investigated thoroughly and completely, are responded to in a timely manner, and appropriate corrective action taken decisively and promptly. The Company being an affiliate of Caesar's Entertainment, Inc., the Caesar's Entertainment, Inc.'s guidelines for investigation of sexual harassment complaints will be followed. The Caesar's corporate policy is attached hereto as Appendix B.

VIII. SELF-MONITORING PROCESS

The AA/EEO Committee will meet quarterly to review implementation and effectiveness of this Plan and to amend the plan, upon prior written notice to IGB, should the need for such amendment in the Committee's judgment arise. The Human Resources Manager will act as Secretary of the Committee and will keep written minutes which, upon request, will be furnished to the IGB staff. Prior to each quarterly meeting, the EEO officer will furnish the Committee members with a written report summarizing: (1) implementation and success of efforts to recruit, train and upgrade minorities in the workforce; (2) employee discrimination/harassment complaints; and (3) any other notable AA/EEO issues arising during the previous quarter.



April Mettler
Human Resources Manager



Sherry Wessel
Sr. VP/General Manager

Date: October 29, 2019

Affirmative Action Plan Metropolis



Affirmative Action / Equal Employment Opportunity Policy

At Harrah's Metropolis Casino we are committed to certain principles in support of our Social Investment Plan, as well as, our corporate policy. To strengthen our commitment, these same objectives have been submitted to the Illinois Gaming Board.

In an effort to make these ideals a reality, we have formulated an Affirmative Action/Equal Employment Opportunity Plan ("the Plan"). The plan will be implemented by an Equal Opportunity Committee, including the Senior Vice President & General Manager, Director of Hospitality, Director of Casino Operations, Director of Marketing, Director of Finance, Financial Controller and the Human Resources Manager/EEO Officer.

The plan will allow us to formalize our efforts in ensuring equal employment opportunities for all present and prospective team members at every level of the organization. Additionally, the plan will allow us to ensure employee complaints of discrimination and harassment are promptly investigated and addressed, while also furthering our efforts of ensuring a diverse and harmonious work place.

Pursuant to the Plan, we will ensure that women, minorities, and persons with disabilities are recruited and employed at all levels of our operational work force. We will also work to ensure all employees are treated equally during their employment without regard to their: race, color, religion, creed, sex, gender (including gender identity and gender expression), pregnancy (including childbirth and related medical conditions), age (as defined under applicable law), national origin or ancestry, physical or mental disability, sexual orientation, genetic information, veteran or military status or any other consideration protected by applicable federal, state or local laws. Should you have a complaint, I assure you that your concern will be promptly, thoroughly and professionally investigated. Appropriate action will be taken to address your complaint, as warranted.

We anticipate everyone's complete support and cooperation in the implementation of the Plan and invite you to direct any questions about the Plan to myself, or any Human Resources representative.

Best Regards

A handwritten signature in blue ink that reads "Sherry Wessel 103281". The signature is stylized and includes the number "103281" at the end.

Sherry Wessel

Senior Vice President & General Manager



Anti-Harassment Policy

The Company is committed to providing a work environment that is free from all forms of discrimination, harassment, intimidation, or retaliation for opposing such conduct. Harassment based upon the following legally and/or Company protected characteristics will not be tolerated: race, color, religion, creed, sex, gender (including gender identity and gender expression), pregnancy (including childbirth and related medical conditions), age (as defined under applicable law), national origin or ancestry, physical or mental disability, sexual orientation, genetic information, veteran or military status or any other consideration protected by applicable federal, state or local laws.

This policy applies to everyone in the workplace, including officers, managers, supervisors, co-workers and third parties not employed by the Company, such as non-Team Member visitors, vendors, consultants and clients/customers. Additionally, this policy applies to any harassing conduct, whether occurring in the workplace or while engaging with coworkers outside the workplace, including, but not limited to, Company-related activities such as during businessstrips, offsite meetings or Company-sponsored social events.

Sexual Harassment Defined

Sexual harassment is a special form of sex-based harassment that includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment;
- Submission to or rejection of such conduct is used as a basis for employment;
- decisions affecting the individual; or,
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Following are examples of sexual harassment:

- Unwanted sexual or romantic advances/propositions in any form, including verbal, written and electronic;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons, posters or graffiti;
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about a co-worker's body or dress;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes or invitations;
- Physical conduct: touching, assault, impeding or blocking movements.

This policy applies to harassment by individuals of the same sex or opposite sex.

Other Types of Harassment

As stated above, harassment based on *any* protected characteristic(s) is also prohibited. Examples of prohibited harassment when aimed at or based on a protected characteristic include, but are not limited to, the following:

- Verbal conduct including threats, jokes, epithets, derogatory comments or slurs;
- Visual conduct including derogatory posters, photography, cartoons, drawings, emails, websites, gestures or graffiti;
- Physical conduct including assault, unwanted touching or blocking normal movements.

Internal Complaint Procedure

If you believe that you or one of your co-workers has been the victim of prohibited harassment, you should promptly notify, either verbally or in writing, any of the following: (1) your department supervisor or manager; (2) Human Resources for your property; (3) corporate Human Resources; or (4) the Ethics and Compliance Hotline. Employees who witness or experience any harassing behavior are expected to report such behavior immediately. Any supervisors or managers who receive any complaints of harassing conduct, or otherwise witness or become aware of conduct that appears to violate this policy, must report the harassing conduct, either verbally or in writing, to corporate Human Resources immediately.

The Company will investigate all good faith complaints thoroughly, promptly and fairly. Upon conclusion of the investigation, the Company will take appropriate disciplinary action against those found to have violated Company policies, up to and including the termination of employment. The Company will keep complaints and the resolution of such complaints confidential to the extent practicable, subject to its practice of conducting an appropriate investigation and taking appropriate disciplinary action. Supervisors or managers who are aware of conduct in violation of this policy and fail to report it will be subject to disciplinary action, up to and including the termination of employment.

Retaliation is Prohibited

It is a violation of the Company's Anti-Harassment Policy to retaliate against anyone for making a good faith complaint of harassment. Similarly, retaliation against anyone participating in the Company's investigation of a complaint is strictly prohibited. If you feel that you have been retaliated against for making or assisting in the investigation of a complaint or otherwise, you should promptly notify any of the following:

- (1) your department supervisor or manager;
- (2) Human Resources for your property;
- (3) corporate Human Resources; or,
- (4) the Ethics and Compliance Hotline.

Any complaint of retaliation will be investigated, and appropriate corrective action will be taken where it is warranted.



December 30, 2020

Mr. Marcus Fruchter
 Administrator
 Illinois Gaming Board
 160 N. LaSalle, Suite 300
 Chicago, IL 60601

Re: 2020 Annual Report on Diversity

Dear Administrator, Fruchter:

Pursuant to 230 ILCS 10/7.11(a), Hollywood Casino Aurora submits the following information for its 2020 annual report on diversity:

(i) a good faith affirmative action plan to recruit, train, and upgrade minority persons, women, persons with a disability, and veterans in all employment classifications;

Hollywood Casino Aurora submits its good faith affirmative action plan to the IGB each year during its annual license update. A copy of the report submitted by Hollywood Casino Aurora in its 2020 annual license update is separately attached.

(ii) the total dollar amount of contracts that were awarded to businesses owned by minority persons, women, persons with a disability, and veteran;

(iii) the total number of businesses owned by minority persons, women, persons with a disability, and veteran that were utilized by the licensee;

(iv) the utilization of businesses owned by minority persons, women, persons with a disability, and veteran during the preceding year.

	1/1/20 - 12/31/20	Total # of MWDVBEs	2020 Utilization
MBE	\$382,142	14	4.84%
WBE	\$588,574	26	7.46%
DBE	\$11,067	3	0.14%
VBE	\$8,658	1	0.11%
Total	\$990,441	44	12.6%

((v) the outreach efforts used by the licensee to attract investors and businesses consisting of minority persons, women, persons with a disability, and veteran.

With high levels of concern about COVID-19 as reported in the state of Illinois and throughout the country, Hollywood Casino Aurora is temporarily shut down. This is our second COVID-19 related closure and consequently our contracting has been negatively impacted. In spite of the societal impacts of COVID-19, Hollywood Casino Aurora has continued the good faith efforts to pursue opportunities with diverse vendors.

The following accomplishments have occurred during calendar year 2020:

- Purchasing Manager, Kim Woods, became an active member of the PNG Supplier Diversity team responsible to ensure increased supplier diversity via contracting goals.
- Diversity leadership spearheaded by our GM and Purchasing leadership planned and hosted a virtual Diversity Vendor Fair which had representation from all 5 Chicagoland casinos and registered over 194 registrations with 122 signed on attendees.
- Established direct contact with two new veteran owned contractors; both firms actively participate in our bidding processes.
- We have strengthened relationships with MBE/DBE/WBE/VBE agencies including:
 - National Minority Supplier Development Council
 - CMS – Central Management Services, BEP with the State of IL
 - Minority Business Development Center, IL
 - Elite SDVOSB, veteran agency

Hollywood Casino Aurora and Penn will always seek opportunities with qualified DBE/MBE/WBE/VBE vendors and will continue our good faith efforts in that regard. Ongoing efforts include:

Outreach Efforts Currently in Place

- Each quarter we update the Vendor Opportunities section of our casino website for bid opportunities, bulk purchases and services
- Our website provides access to the Penn Supplier Portal with instructions on how to become a vendor and contact information for the Procurement team at the casino
- Review the Penn Supplier portal for newly registered businesses and follow-up with them and reach out to businesses in the process of becoming registered
- Communication between the Penn Procurement team and the Casino procurement team to identify diverse vendors
- Communicate with other Illinois casinos to network and share potential qualified DBE, MBE, WBE, & VBE vendors

Specific Outreach Events Attended

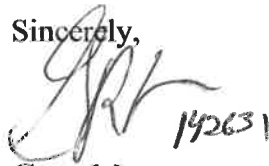
- Co-Hosted a diversity fair in conjunction with Hollywood Casino Joliet and five (5) other Penn Gaming properties.

Internal Procurement Processes

- The Illinois Casino Gaming Association Diversity Vendor List is monitored
- State of Illinois Central Management Services BEP Certification Directory is reviewed
- We maintain an internal database of qualified MBE/DBE/WBE/VBE vendors
- Identify veteran owned businesses at <https://www.veteranownedbusiness.com/il>
- Work with Penn National Gaming, Inc. corporate procurement to consolidate planned purchases from other Penn properties with the objective of increasing the total spend with specific diversity vendors

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Greg Moore
Vice President and General Manager

cc: Amber Crowley
Tammy Compton
Carrie Carroll - IGB Casino Field Supervisor
Sgt. Darin Cygan
Jeremy Howland

HOLLYWOOD CASINO AURORA
Affirmative Action Plan

I. INTRODUCTION

Since its inception in 1993, Hollywood Casino Aurora (HCA) has demonstrated an outstanding record of recruitment and hiring of qualified individuals who are minorities or members of other protected classes. HCA's policy of equal opportunity employment pertains to all aspects of employment, including but not limited to, recruitment, hiring, job assignment, training, transfer, and promotion, social, educational and recreational programs. Equal opportunity may entail reasonable accommodation of an individual's religion, or disability or participation in protected activity, as defined by law.

HCA maintains its Affirmative Action Plan to enhance, expand and continue its outstanding record of equal opportunity employment and a diverse work force. The goal of this Affirmative Action Plan is to maintain a work force that truly reflects the diverse elements of Kane County and the surrounding area. This plan is maintained in good faith with the continued goal of equal opportunity employment and a diverse work force.

A. Overview

The Hollywood Casino in Aurora, Illinois, owned and operated by Penn National Gaming and is an Illinois Licensed Gaming Facility. This Affirmative Action Plan reports the workforce as of September 10, 2020. The workforce totals 291 plus employees.

B. Equal Employment Opportunity Policy and Affirmative Action Plans.

It is the policy of HCA to employ qualified persons of the greatest ability without discrimination against any employee or applicant for employment because of race, religion, color, sex, disability, national origin, ancestry, marital status, age, status as a covered veteran or any other protected group status as defined by law. To implement this policy,

HCA has established an Affirmative Action Plan by which we undertake that:

1. We will recruit, hire, train and promote qualified persons in all job titles, without regard to race, religion, color, sex, disability, national origin, ancestry, age, covered veterans' status, or any other protected group status as defined by law.
2. We will base decisions on employment so as to further the principle of equal employment opportunity.
3. We will ensure that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities.
4. We will ensure that all personnel actions such as compensation, benefits, transfers, layoffs, training, education, tuition assistance, and social and recreational programs, will be administered without regard to race, religion, color, sex, disability, national origin, ancestry, age, covered veterans' status or any other protected group status as defined by law.

II. DISSEMINATION OF POLICY

1. The company policy regarding Equal Employee Opportunity is distributed to all employees during their first day of employment and as any updates may occur. Federal Equal Employment Opportunity materials are posted in the Human Resources Office in view of all employees.
2. The General Manager will reaffirm HCA's EEO Policy annually, as outlined in section V.
3. HCA's recruiting materials and electronic application includes a statement regarding our Equal Employment Opportunity stance.

4. HCA participates in and contributes to organizations concerned with employment opportunities for minorities and females.

III. RESPONSIBILITY FOR IMPLEMENTATION

The development and execution of The Affirmative Action Plan shall be administered as outlined below:

A. Equal Employment Coordinator

The Vice President of Human Resources has been designated as the Equal Employment Coordinator and given the responsibility to supervise the implementation of the Affirmative Action Plan as follows:

1. Assist in the identification and resolution of EEO focus areas.
2. Inform management of recent developments in the area of affirmative action.
3. As hiring need dictates, Human Resources Department lists job openings and/or conducts on-site recruiting at various local area and minority college campuses including, but not limited to:

Aurora University

Waubonsee Community College

Participation in the College Employment Network

4. As hiring needs dictate, participate in The Illinois Job Link Program of the Illinois Department of Employment Security and list appropriate available job openings.
5. The Human Resources Department utilizes bilingual employees in order to assist Spanish-speaking applicants (as scheduling and staffing requirements permit).

6. Ensure minorities and women have the opportunity to participate in Company sponsored educational, training, social and recreational activities.
7. Encourage and accommodate members of protected classes to participate in the leadership training and other development opportunities.
8. Ensure that facilities such as locker rooms and rest rooms are comparable for both genders.
9. Serve as liaison between HCA and various federal, state and local enforcement agencies.
10. Maintain records and reports as required by the state, federal and local authorities relevant to equal employment.
11. On an annual basis HCA obtains and reviews EEO percentages for Kane County to compare with HCA's workforce. This annual review is then disclosed to the Illinois Gaming Board at the time of relicensing.

IV. COMPANY MANAGEMENT SUPPORT

The Compliance Department will maintain and review continued compliance in the following areas, enlisting assistance from other managers, Directors and Vice Presidents, as needed.

1. Periodically review job descriptions for accuracy in relationship to the actual functions and duties and confirm that the qualifications required for positions are free from bias and are job-related.
2. HCA's tuition reimbursement program is available on an equal opportunity basis to all full-time employees who meet the eligibility requirements.
3. HCA supports local community organizations dedicated to the advancement of minorities and women.

4. Company sponsored programs, including recreational and social events, are available in accordance with the Equal Employment Opportunity Policy.
5. Openings in regular and part-time jobs will continue to be communicated to employees through posting.
6. All employees, including minorities and females will be encouraged to use the tuition reimbursement program.
7. Minorities and other protected classes will be provided equal review with regards to promotions and performance evaluation.

V. ANNUAL MEETING

A meeting will be held on an annual basis with the Vice President and General Manager, Vice President of Human Resources and a representative of the Compliance segment, to review and assess the current status of HCA's Affirmative Action Plan.

HOLLYWOOD *Casino*[®]

— JOLIET —

December 31, 2020

Mr. Marcus Fruchter
 Administrator
 Illinois Gaming Board
 160 N. LaSalle, Suite 300
 Chicago, IL 60601

Re: 2020 Annual Report on Diversity

Dear Administrator, Fruchter:

Pursuant to 230 ILCS 10/7.11(a), Hollywood Casino Joliet submits the following information for its 2020 annual report on diversity:

(i) a good faith affirmative action plan to recruit, train, and upgrade minority persons, women, persons with a disability, and veterans in all employment classifications;

Hollywood Casino Joliet submits its good faith affirmative action plan to the IGB each year during its annual license update. A copy of the report submitted by Hollywood Casino Joliet in its 2020 annual license update is separately attached.

(ii) the total dollar amount of contracts that were awarded to businesses owned by minority persons, women, persons with a disability, and veteran;

(iii) the total number of businesses owned by minority persons, women, persons with a disability, and veteran that were utilized by the licensee;

(iv) the utilization of businesses owned by minority persons, women, persons with a disability, and veteran during the preceding year.

	1/1/20 - 12/31/20	Total # of MWDVBEs	2020 Utilization
MBE	\$79,917	11	0.8%
WBE	\$711,550	26	7.1%
DBE	\$30,939	1	0.3%
VBE	\$180,045	1	1.8%
Total	\$1,002,451	39	9.9%

(v) the outreach efforts used by the licensee to attract investors and businesses consisting of minority persons, women, persons with a disability, and veteran.

With high levels of concern about COVID-19 as reported in the state of Illinois and throughout the country, Hollywood Casino Joliet is temporarily shut down. This is our second COVID-19 related closure and consequently our contracting has been negatively impacted. Despite the societal impacts of COVID-19, Hollywood Casino Joliet has continued the good faith efforts to pursue opportunities with diverse vendors.

The following accomplishments have occurred during calendar year 2020:

- GM, Lydia Garvey, became an active member of the Penn National Gaming (PNG) Diversity Committee as well a member of its Procurement Subcommittee.
- Purchasing Manager, Kim Woods, became an active member of the PNG Supplier Diversity team responsible for ensuring increased supplier diversity via contracting goals.
- Diversity leadership spearheaded by our GM and Purchasing leadership planned and hosted a virtual Diversity Vendor Fair which had representation from all 5 Chicagoland casinos and registered over 194 registrations with 122 signed on attendees.
- Established direct contact with two new veteran owned contractors.
- We have strengthened relationships with MBE/DBE/WBE/VBE agencies including:
 - National Minority Supplier Development Council
 - CMS – Central Management Services, BEP with the State of IL
 - Minority Business Development Center, IL
 - Elite SDVOSB, veteran agency

Hollywood Casino Joliet and Penn will always seek opportunities with qualified DBE/MBE/WBE/VBE vendors and will continue our good faith efforts in that regard. Ongoing efforts include:

Outreach Efforts Currently in Place

- Each quarter we update the Vendor Opportunities section of our casino website for bid opportunities, bulk purchases and services
- Our website provides access to the Penn Supplier Portal with instructions on how to become a vendor and contact information for the Procurement team at the casino
- Review the Penn Supplier portal for newly registered businesses and contact to explore procurement opportunities as well as reach out to businesses in the process of becoming registered
- Communication between the Penn Procurement team and the Casino procurement team to identify diverse vendors
- Communication with other Illinois casinos to network and share potential qualified DBE, MBE, WBE, & VBE vendors

Specific Outreach Events Attended


Hollywood Casino Joliet organized and hosted a Diverse Vendor Webinar in November 2020. Due to the pandemic many events were cancelled, and some occurred during closures at which time team members were furloughed and not able to participate.

Internal Procurement Processes

- The Illinois Casino Gaming Association Diversity Vendor List is monitored
- State of Illinois Central Management Services BEP Certification Directory is reviewed
- We maintain an internal database of qualified MBE/DBE/WBE/VBE vendors
- Identify veteran owned businesses at <https://www.veteranownedbusiness.com/il>
- Work with Penn National Gaming, Inc. corporate procurement to consolidate planned purchases from other Penn properties with the objective of increasing the total spend with specific diversity vendors

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Lydia Garvey
Vice President and General Manager

cc: Cindy Thomas
Amber Crowley
Tammy Compton
Sgt. Charles Cobb
Jeremy Howland

Exhibit B

The following goals and plans of action will create a workplace that embraces diversity as a key element in this organization.

Goal #1

Hire and promote applicants based on merit and equality while focusing on recruiting, developing and hiring a diverse workforce.

Plan of Action A: Advertise job opportunities with organizations that target women, minorities, and people with disabilities.

2019 Affiliations, Accomplishments, and Initiatives: Weekly Job Postings are sent to: Elgin Community College, Illinois Valley Community College, Kankakee Community College, Kishwaukee College, McHenry County College, Moraine Valley Community College, Oakton Community College, Prairie State College, South Suburban College, Triton College, Waubensee Community College, Catholic Charities Diocese of Joliet. College of DuPage, Joliet Junior College, Cornerstone Services, Joliet Cornerstone Services, Operation Job Ready Veterans, Governor State University, IDES, University of St. Francis, Workforce Services Division of Will County, Rasmussen College, Purdue University Calumet and Workforce Services Division of Grundy County.

2020 Projected Action Steps: Continue to establish relationships with the above mentioned as well as look for new organizations to build relationships with, focusing on targeting a more diverse workforce. Additionally, we have worked and will continue to work with the Illinois Workforce Division of Will County to hire veterans.

Hollywood Casino Joliet, in conjunction with our corporate Talent Acquisition team, continues to send our weekly job openings to the above-mentioned agencies/schools and is actively looking for more organizations to send our postings to. We have continued to further strengthen our relationship with Joliet Junior College and in addition to directly recruiting staff from the culinary program.

Plan of Action B: Work with community organizations that represent minorities, women, and people with disabilities to assist in preparing their clients for the workforce.

2019 Affiliations, Accomplishments, and Initiatives: The following scholarships were sponsored by Hollywood Casino: Lewis University- \$5,000, Joliet Junior College- \$5,000, University of St. Francis- \$5,000.

2020 Projected Action Steps: Continuously look for ways to work with community organizations to help the community prepare our workforce.

Hollywood Casino Joliet actively works with any agency that requests assistance in hiring individuals with diverse backgrounds and disabilities. We continuously work with job coaches at Trinity to ensure our employees from that agency are excelling in their positions.

Plan of Action C: Work with community organizations that have relationships with our retired workforce that would like to get back to work.

2019 Affiliations, Accomplishments, and Initiatives: In 2019, we continued to establish relationships with several organizations geared toward assisting the retired workforce.

2020 Projected Action Steps: Our property will assign a new member to serve on the board of Senior Services of Will County. This candidate will review our job postings and hiring practices with them so they can share our information with their members.

Plan of Action D: Track applicant flow by monitoring a survey in the application process asking applicants to voluntarily indicate race and gender. This survey is kept separate from the employment application.

This report is available electronically through our online application system. We look at this report to see how diverse our applicant pool is and ensure our hiring practices match the ratios.

2019 Affiliations, Accomplishments, and Initiatives: All data is collected by Human Resources and monitored.

2020 Projected Action Steps: Continuously monitor hiring and EEO Statistics to ensure a diverse workforce is being hired.

Every quarter Human Resources down loads an EEO report from our HRIS system to track and monitor our EEO statistics. This report is also reviewed by the Vice President/General Manager and Vice President of Human Resources.

Goal #2

We will continue to recruit candidates for the Management LEAP Intern program in cooperation with our corporate management team. This program is designed for recent graduates who are interested in building a career in the gaming industry. We value the addition of new energy, talent and expertise into our organization. This 18 month program has been developed to mold Penn's leaders of tomorrow and continue our company's success well into the future. Our program will provide hands-on-training, mentoring and real world experience which will provide the necessary tools to be successful at Hollywood Casino Joliet.

Plan of Action A: Maintain Hollywood Casino Joliet as an employer of choice for potential Management Interns from top universities throughout the United States.

2019 Affiliations, Accomplishments, and Initiatives: Our property did not have a Management LEAP Intern in 2019.

2020 Projected Action Steps: Corporate continues to recruit for Management LEAP Interns.

Goal #3

Ensure our employees are fully trained on the Company's Sexual and other unlawful harassment policy.

2019 Affiliations, Accomplishments, and Initiatives: All new hires in orientation are trained on the Company's sexual harassment and other unlawful harassment policy.

2020 Projected Action Steps: In addition to sexual harassment training that is covered in orientation, supervisors and above meet one on one with a Human Resources Business Partner to cover policies more in depth. During this meeting, the Sexual Harassment and discrimination policy is also covered and it is discussed what role they play in ensuring our workplace is free from harassment and discrimination.

Goal #4

Hollywood Casino Joliet will continue to make donations to organizations and have all employees become more actively involved in the Joliet Community.

Plan of Action A: Hollywood Casino Joliet will continue to provide community service support to local non-for profit agencies that help to better the Joliet community.

In 2019, Hollywood Casino Joliet continued to support our community by making direct contributions to organizations and encouraging our employee base to donate their time for community causes.

2019 Affiliations, Accomplishments, and Initiatives: Hollywood Casino continued to encourage our employees to volunteer and/or contribute within the local community. In 2019 the company and our employees donated \$10,971 to the American Cancer Society & Relay for Life. An additional \$4,209 was donated to Guardian Angel, Crisis Line and Susan G. Komen foundation through company sponsored events.

2020 Projected Action Steps: We will continue to offer volunteer events for our employees to participate in.

When looking for organizations to volunteer our time and get our employees involved, we continuously look for agencies that assist in bettering the Joliet community, such as Daybreak Center of Joliet.

Goal #5

Retain and promote qualified employees and create a work environment where employees can realize their full potential.

Plan of Action A: Encourage professional development by providing tuition reimbursement.

We currently have 4 cast members receiving tuition reimbursement to complete their undergraduate or graduate degree. In 2019, we had 5 cast members utilize our tuition reimbursement program.

2019 Affiliations, Accomplishments, and Initiatives: Hollywood Casino Joliet will work with any University to help assist employees with their educational costs through our tuition reimbursement plan. Our tuition reimbursement policy reflects \$3,000.00 for full-time cast members and \$1,500.00 for part-time cast members.

2020 Projected Action Steps: We will continue to remind cast members of our tuition reimbursement program and encourage them to reach their full potential through education.

Plan of Action B: Encourage supervisors to realize their full potential and continue to grow into management ranks.

2019 Affiliations, Accomplishments, and Initiatives During 2019, Hollywood Casino Joliet Corporate iLead program was being revised and a new leadership training will be rolled out in 2020.

2020 Projected Action Steps: We will focus our monthly manager strategy meetings on development of management staff to become better leaders within our organization. We will also rollout new Corporate training classes for supervisors and above.

HOLLYWOOD
Casino[®]
JOLIET

2020

AFFIRMATIVE ACTION PLAN

HOLLYWOOD CASINO JOLIET

JANUARY 1, 2020 THROUGH DECEMBER 31, 2020

TABLE OF CONTENTS

Identification Page.....	iii
Preface	4
Implementation of Affirmative Action Plan.....	5
I. Policy Statement	5
II. Internal and External Dissemination of Policy	6
III. Responsibility for Implementation of A.A. Program.....	7
IV. Development and Execution of Additional Action Oriented Programs.....	8
V. Internal Audit and Reporting Requirements	9
VI. Guidelines Prohibiting Sex Discrimination	10
VII. Support of Community Action Programs	11
VIII. Consideration of Minorities and Females Not Currently in the Workplace.....	12
IX. Guidelines Prohibiting Religious and National Origin Discrimination	13
X. Guidelines Prohibiting Disability Discrimination.....	14
XI. Workforce Analysis	15
XII. Utilization Analysis	16
XIII. EXHIBITS	

AFFIRMATIVE ACTION PROGRAM FOR: Hollywood Casino Joliet

Hollywood Casino Joliet
777 Hollywood Blvd
Joliet, IL 60434-2789

Inclusive Dates of AAP:

January 1, 2020 to December 31, 2020

Program Completed by:

Human Resources Department

PREFACE

This Affirmative Action Plan (“AAP”) is made and implemented by Hollywood Casino Joliet (“the Company”), in compliance with the requirements of the Illinois Gaming Board pursuant to the Illinois Riverboat Gambling Act, Section 7(b)(4) and with the guidance of the Illinois Code of State Regulations.

The Company does not believe that any violation of the Illinois Human Rights Act, Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, the Age Discrimination in Employment Act, the Americans with Disabilities Act, or any other applicable federal, state or local law exists within the Company. Accordingly, this AAP is not adopted or implemented to correct or remedy any actual or alleged discriminatory action or policy. Nothing herein shall be construed to require the Company to hire, decline to hire, dismiss or decline to dismiss any individual in any particular situation; to require the Company to contract with, decline to contract with, terminate a contract with, or decline to terminate a contract with any particular vendor or contractor in any particular situation; to violate any law, ordinance, or regulation relating to discriminatory practices; or to violate the provisions of any collective bargaining agreement to which the Company is a party.

This AAP contains confidential information. Copies of this AAP and all related appendices, documents and support data are made available to the Illinois Gaming Board (“IGB”) with the request that the IGB holds them totally confidential and does not release copies to any persons whatsoever. This AAP and its supporting documents contain significant confidential information which may reveal, directly, or indirectly, the Company’s business plans. The Company considers the AAP to be exempt from disclosure, reproduction, and distribution under the Illinois Freedom of Information Act, 5 ILCS 140/1 *et seq.*, and the Illinois State Records Act, 5 ILCS 160/1, *et seq.* If the IGB, the government of the State of Illinois, or any agency or subdivision thereof, is considering a request for release of this program, request is hereby made that the President of the Company be immediately notified of any and all requests received or any other contemplated release of this program which relates to information obtained by the IGB or the government from the Company. The Company further requests that anyone who has any contact with this AAP, or its supporting appendices, documents and other data, treat such information as totally confidential and that such information not be released to any person whatsoever.

Program Terminology

The terms “utilization analysis”, “underutilization” and “problem area” appearing in this AAP are used in order to reflect terminology typical to equal employment opportunity and affirmative action programs. These terms have no independent legal or factual significance whatsoever. We will use terms in total good faith in connection with the AAP. However, such usage does not necessarily signify that the Company agrees that these terms have any particular significance in connection with any particular factual situation.

Reliance on Equal Employment Opportunity Commission’s Guidelines on Affirmative Action

The Company has in good faith developed this AAP along the lines of, in conformity with, and in reliance on the Equal Employment Opportunity Commission’s Guidelines on Affirmative Action, 29 C.F.R. § 1608.1-12.

IMPLEMENTATION OF THE
AFFIRMATIVE ACTION PROGRAM

I. Policy Statement

This document establishes the Company's Affirmative Action Program with regard to equal employment opportunity. It has been designed to provide guidance and assurance for implementation of and commitment to our equal employment opportunity policy consistent with the voluntary nature of the employment relationship. The Company is committed to equal employment opportunity and affirmative action as stated in the notice to employees, which is issued annually and attached as **Exhibit A**. The Company's policy includes the following commitments:

(A) To provide equal employment opportunity to all qualified, available, and interested persons, and an affirmation of our commitment to recruit, advertise for employment, hire, upgrade, transfer, promote, lay off, terminate, pay and select for training, persons in all job classifications without regard to race, color, religion, sex, national origin, or legally protected disability or age status.

(B) To identify and analyze all areas of employment so as to further the principle of affirmative action for minorities and females. The Company is committed to apply result-oriented employment policies and practices in good faith efforts to achieve prompt and full utilization of qualified, available, and interested persons regardless of race, color, religion, sex, national origin, or legally protected disability or age status. All employment decisions will be based accordingly, as follows:

(1) Recruitment and Selection - the Company will recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, sex, national origin, or protected disability or age status.

(2) Employment Decisions - the Company will base employment decisions so as to further the principle of equal employment opportunity.

(3) Promotions - the Company will ensure that promotion decisions are in accordance with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities.

(4) Personnel Actions - the Company will ensure that all personnel actions such as compensation, benefits, transfers, lay-offs, returns from lay-offs, company-sponsored training, education, tuition assistance, social and recreational programs, will be administered without regard to race, color, religion, sex, national origin or protected disability or age status.

(5) The Vice President of Human Resources is designated as the property EEO and Affirmative Action Officer and overall Affirmative Action Program responsibility is assigned to that position.

(6) The property EEO and AA Officer will require that managers and supervisors report to him or her on the performance of EEO and AA responsibilities on a regular basis and shall monitor the procedures for implementation of this AA plan.

(7) This AAP shall be reviewed, analyzed, reaffirmed and re-issued annually.

II. Internal and External Dissemination of Policy

(A) Internal Dissemination - it is the Company's policy to periodically bring its policies of equal employment opportunity and affirmative action to the attention of all its employees. Necessary steps will be taken to assure that the Company personnel, both supervisory and otherwise, are fully apprised of the Company's equal employment opportunity policy and its affirmative action commitment. The following methods of dissemination will be utilized:

(1) A copy of the Company's equal employment opportunity policy will be included in the Employee Handbook.

(2) Meetings will be conducted with executive, management and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation of the affirmative action commitment.

(3) The Company shall conduct periodic reviews of the effectiveness of this program in which its supervisory and other involved personnel participate.

(4) Company publications, if any, will contain articles covering equal employment opportunity programs, including promotions of minority and female employees.

(5) The equal employment opportunity policy statement will be posted on Company diversity boards (see **Exhibit A**).

(6) In order that new employees will be apprised of the Company's equal employment opportunity policy and commitment to affirmative action, both will be discussed during the Company's orientation process and management training programs.

(7) Including non-discrimination clauses in all union agreements and reviewing all contractual provisions to ensure they are non-discriminatory.

(8) Picturing both minority and non-minority men and women in publications in which employees are featured.

(9) Making current employees aware of the existence of the Company's AAP and the benefits available to them.

(B) External Dissemination - The Company will promote its community posture as an equal opportunity and affirmative action employer. Specific external actions shall include:

(1) Recruitment advertising, if any, will clearly show that the Company is an equal opportunity and affirmative action employer.

III. Responsibility for Implementation of the Affirmative Action Program

The Company's General Manager has the overall responsibility to implement the Company's Equal Employment Opportunity Policy and Affirmative Action Plan. The Company, with the full support of executive management, has assigned the Vice President of Human Resources to act as EEO Officer with responsibility for implementing and monitoring overall facility performance and ensuring attainment of full compliance with the Company's policy for nondiscrimination in employment. The responsibilities of the EEO Officer include, without limitation, the following:

(A) Developing an effective Affirmative Action Program and maintaining such program in compliance with Company policy including both internal and external communication techniques.

(B) Designing and implementing review and reporting systems to ensure awareness of the Affirmative Action Program and its benefits, as well as:

- (1) Measuring the Program's effectiveness
- (2) Determining the degree to which the Company's objectives have been attained.
- (3) Indicating any need for remedial action.

(C) Serving as the Company's representative in its dealing with federal, state and local enforcement agencies.

(D) Keeping department managers and supervisors informed of the latest developments in the entire equal employment opportunity area.

(E) Serving as liaison between the Company and minority organizations, women's organizations, and community action groups concerned with employment opportunities of minorities and women.

(F) Regularly communicating with managers, supervisors and employees to be certain that EEO policies are being followed.

(G) Reviewing the qualifications of employees to ensure that minorities and females are given full opportunities for transfers and promotions.

(H) Ensuring compliance in areas such as properly displayed posters, non-segregated facilities, comparable facilities for both sexes and full participation by minority and female employees in all Company-sponsored educational, training, recreational and social activities, if any.

(I) Making department managers and supervisors aware that their work performance is being evaluated on the basis of their equal employment opportunity and affirmative action efforts and results as well as other criteria.

(J) Ensuring that managers and supervisors take action to prevent harassment of or discrimination against any employee on the basis of his or her race, color, religion, national origin, sex, or protected disability or age status.

(K) Ensuring that the Company's job descriptions accurately set forth actual job duties and, in particular, the essential functions of the job.

(L) Monitoring the results of all scored testing to assure that the tests do not adversely impact minorities and females as compared to non-minorities and males.

IV. Development and Execution of Additional Action Oriented Programs

The Company has developed the following action-oriented programs tailored in such a manner that their proper execution will result in either an increase in the number of qualified minority and/or female applicants for any vacancies which occur, or documentation of the Company's good faith efforts to increase the number of qualified minority and/or female applicants for any vacancies which may occur.

(A) Job classifications shall be periodically reviewed, evaluated and, where necessary, updated to ensure that employees within various classifications are rated in relationship to the requirements and essential functions of the job using, where appropriate, objective factors such as relative skill, ability and experience. In addition, the Company shall ensure that job classifications are consistent for the same or related jobs.

(B) The Company will ensure that any worker specifications shall be job-related and review thereof shall include considerations of any academic experience or skill requirements to ensure that they are necessary and do not inadvertently screen out minorities or females. Where appropriate, modifications will be made in worker specifications to promote the purposes of equal employment opportunity.

(C) Any job descriptions or worker specifications used shall be made available to all members of management involved in the recruiting, screening, selection and promotion process. All personnel involved in recruiting, screening, selection, promotion, disciplinary and related processes will be carefully selected and trained to ensure that they are not biased in their personnel actions.

(D) The Company will continue to evaluate the entire selection process and will endeavor to be particularly sensitive in recruiting and hiring, especially at the entry level, to select candidates according to ability and qualifications. In its recruiting efforts, the Company shall endeavor to obtain qualified applicants including minorities and females. No department, job category or title at the Company shall be limited or closed to minorities or females.

(E) Contacts with all sources of minority and female applicants will reflect the Company's posture and emphasis on equal employment opportunity. The Company will encourage employees to refer minority and female applicants. The Company will also place help-wanted advertisements in publications directed to minorities and females. The Company is committed to contacting minority and women's organizations for referral of prospective applicants for openings which may occur. The Company has explained and will continue to explain its commitment to equal employment opportunity to representatives of recruitment sources. These explanations provide clear and concise descriptions of current and future job openings, as well as a description of the Company's selection process. The Company has made position descriptions, worker specifications and recruiting literature available to these representatives. The Company has also made arrangements with these recruiting sources for referral of applicants and feedback on the hiring status of applicants referred by these sources.

(F) The Company shall review its promotion criteria and procedures to ensure that minorities and females are given equal consideration for promotion.

(G) All Company facilities and Company-sponsored social and recreational activities, if any, are not segregated and the Company actively encourages all employees to participate in all Company-sponsored events.

(H) The company will make reasonable efforts to modify job duties or working conditions to accommodate the employment of persons with physical or mental disabilities.

(I) See **Exhibit B** for a listing of action steps that have been taken to promote diversity in the workplace.

V. Internal Audit and Reporting Requirements

As stated previously, the EEO Officer is responsible to implement the auditing and reporting system. The auditing and reporting system will be reviewed on an annual basis. The following procedures will be utilized to measure the effectiveness of the total program:

- (A) Review records of referrals, placements, transfers, promotions and terminations by department and major job groups to ensure nondiscriminatory policies are carried out.
- (B) Have a system that will measure the Company's commitments to equal employment opportunity.
- (C) Where needed, the EEO Officer will submit recommendations to improve performance to the Company's General Manager.
- (D) Review all selection, promotional, and training procedures to ensure that they are non-discriminatory.
- (E) Inform top management on a regular basis of the effectiveness of the policy and make recommendations for improvements as necessary.

In addition to the internal audit provisions set forth above, the EEO Officer will maintain records of the affirmative action efforts which include memoranda, publications and both informal and formal action-oriented steps that have been taken during the Affirmative Action Plan year not otherwise reported.

VI. Guidelines Prohibiting Sex Discrimination

The Company shall comply with the sex discrimination guidelines as follows:

- (A) Advertisements in newspapers and other media, if any, shall not express a preference for members of a particular sex.
- (B) An employee of either sex shall have an equal opportunity to fill any available job that he or she is qualified to perform.
- (C) The Company shall not make any distinction based upon sex in employment opportunities, wages, hours, or other conditions of employment.
- (D) The Company shall not deny any female employee the right to any job that she is qualified to perform in reliance upon state “protective” laws.
- (E) Females shall not be penalized in any term or condition of employment and/or benefit of employment because they require time away from work for pregnancy or childbearing.
- (F) Maternity disability leave is the same as any other disability leave.
- (G) The Company will not specify any differences for male and female employees regarding either mandatory or optional retirement age.
- (H) The Company shall not discriminatorily restrict one sex to certain job classifications.
- (I) The Company will maintain a sexual discrimination policy that defines unacceptable behavior on the part of its employees and will include procedures for the reporting and investigation of sexual harassment claims.

All levels of management shall be made aware of the above rules and informed that adherence to them will be considered a part of acceptable job performance. These guidelines will be part of the Company’s ongoing policies.

VII. Support of Community Action Programs

(A) Where possible, the Company will attempt to identify minority and female suppliers and contractors and will consider the utilization of their goods and services on an equal basis with others.

(B) The Company encourages all of its employees, particularly its executive and supervisory personnel, to be actively involved in community service organizations, particularly those that support the employment of minorities and females.

VIII. Consideration of Minorities and Females Not Currently in the Workforce

(A) Minorities and females not in the workforce who have requisite skills will be considered whenever suitable openings are available. Positive attempts will be made to recruit minorities and females through the Illinois Department of Employment Security, minority and women's organizations, publications which have a minority and female audience, and other resources utilizing appropriate recruiting techniques.

IX. Guidelines Prohibiting Religious and National Origin Discrimination

The Company will not discriminate against any employee or applicant for employment because of religion or national origin and will take affirmative action to ensure that qualified minority and female individuals, regardless of religion and/or national origin are encouraged to apply for any openings which may occur and that employees are treated during employment without regard to religion or national origin. These policies apply to all aspects of the employment relationship, including, but not limited to, the following: hiring, promotion, demotion, discipline, transfer, recruiting, advertising, layoff, discharge, rate of pay and selection for training.

To ensure non-discrimination with regard to religion and/or national origin, the Company is involved in the following outreach and recruitment activities:

- (A) The Company communicates its obligation to provide equal employment opportunity without regard to religion or national origin to all employees, including executives, managers and supervisors.
- (B) Internal procedures exist at the Company to implement equal employment opportunity without regard to religion or national origin.
- (C) The Company periodically informs all employees of its commitment to equal employment opportunity without regard to religion or national origin.
- (D) Contacts are made with religious and ethnic organizations for education, assistance and referral of potential employees.

The Company will make reasonable accommodations to the religious observances and practices of employees or prospective employees, provided such accommodations can be made without hardship to the Company or its other employees. The extent of our obligation is determined by considering business necessity, financial costs and expenses, and resulting personnel problems.

In implementing its EEO policy regarding non-discrimination because of religion or national origin, the Company does not discriminate against any qualified employee or applicant for employment because of race, color, religion, sex, national origin, disability status, age, or any other protected status.

X. Guidelines Prohibiting Disability Discrimination

The Company does not discriminate against any qualified individual with a disability, a perceived disability, or a record of a disability in accordance with state and federal law prohibiting discrimination on these grounds. The Company does the following to ensure that all applicants and employees are not discriminated against because of a disability, as defined above:

1. The Company communicates its obligation to provide equal employment opportunity without regard to disability status to all employees, including executives, managers and supervisors.
2. Internal procedures exist at the Company to implement equal employment opportunity without regard to disability status.
3. The Company accurately develops and regularly reviews all job descriptions, specifically validating the essential functions of each job, in order to open as many jobs as possible to qualified individuals with a disability.
4. The Company periodically informs all employees of its commitment to equal employment opportunity without regard to disability status.
5. Recruitment sources are used to provide equal employment opportunity without regard to disability status.
6. The Company reviews employment records to determine the availability of promotable and transferable disabled employees.

The Company reasonably accommodates qualified individuals with a disability except where such accommodation causes undue hardship on the conduct of the Company's business. The extent of the Company's obligation is determined by considering business necessity, financial costs and expenses and resulting personnel problems.

In implementing its EEO policy regarding non-discrimination because of an individual's disability, the Company does not discriminate against any qualified employee or applicant for employment because of race, color, religion, sex, national origin, disability status, age, or other protected basis.

XI. Workforce Analysis

Labor Market statistics are provided by the Illinois Department of Employment Security based upon the US Census Bureau, 2017 American Community Survey and 2006-2010 American Community Survey. A copy of these statistics for the relevant recruitment area which is, Will County compared to the Company is attached as **Exhibit C**. It is pertinent to note that the external availability information does not reflect the availability of minorities and females in the jobs specific to the gaming industry, but is broadly categorized. Therefore, it is not possible to determine with any precision the nature of the skills or abilities possessed by those minority and female persons in the workforce. This makes it difficult to determine whether the statistics reflect candidates for positions with similar content, wage rates and opportunities to the positions in the Company. The Company's analysis of availability is thus necessarily inexact.

XII. Utilization Analysis

Utilization will be reviewed annually to evaluate the continuing effectiveness of the Company's affirmative action process. The Company will consider the placement results that can reasonably be expected from putting forth every good faith effort to make the overall program work. Minority and female employees and applicants will be treated equally in all matters of consideration. Qualifications for employment or promotion will be the overriding consideration. A copy of the Utilization Analysis is attached as **Exhibit C**.

All department managers and supervisors will be made aware of the Company's objectives, and with the annual review of their EEO efforts, minority and female placement will be properly studied.

(Letterhead)

EXHIBIT A

March 2020

TO: All Hollywood Casino Joliet Team Members

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

Hollywood Casino Joliet is an Equal Employment Opportunity employer. Therefore, the rights of all applicants and employees are respected. Equal Employment Opportunity rights apply in the following areas: race, color, religious belief, sex, sexual orientation, veteran status, age, national origin, disability, and marital status. Discrimination on the basis of any of the above is strictly prohibited.

The Company's EEO policies will be applied in all aspects of employment, including recruitment, selection, compensation, training, utilization, work assignment, upgrading, transfer, advancement and termination of employment. These rights are communicated to all employees.

Providing that reasonable accommodations can be made to assure productivity; Hollywood Casino Joliet hires the physically and mentally challenged and does not discriminate against any person because of disability.

Hollywood Casino Joliet complies with all applicable federal, state and local laws, regulations, and executive orders implementing Equal Employment Opportunity objectives, both as to the letter and the spirit of the law.

OPEN DOOR POLICY

Our management team is always willing to listen to your concerns or suggestions. We believe that every person who works at, visits, or patronizes our establishments should be treated with respect at all times. In the event there is a matter you feel needs attention, please follow these steps:

- Discuss it first with your immediate supervisor. If your concern/complaint involves your immediate supervisor, discuss the matter with your department manager.
- If the issue has not been resolved within a reasonable length of time, talk with our department manager or director.
- If there is something you feel cannot be discussed with your supervisor or department manager, contact the Human Resources office at (815) 927-2083 or 927-2414.

We will give all suggestions and complaints full consideration. There will be no discrimination or reprisal against any employee because he or she has advanced an issue. All investigations will be kept in strictest confidence except to the extent necessary to conduct the investigation.

SEXUAL AND OTHER UNLAWFUL HARASSMENT

It is the policy of Hollywood Casino Joliet to maintain a working environment free from all forms of unlawful discrimination and harassment. It will be a violation of Company policy for any employee to unlawfully harass another individual in the workplace. Violation of this policy shall be considered grounds for disciplinary action up to and including termination.

Unlawful harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as sex, color, race, ancestry, religion, national origin, age, physical handicap, medical condition, disability, marital status, veteran status, citizenship status, or other legally protected group status. Hollywood Casino Joliet will not tolerate unlawful, harassing conduct that affects tangible job benefits, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile or offensive working environment.

OUR COMMITMENT

Each of us has a responsibility to support these objectives and to ensure that this policy is fully implemented within our Company.

David Jadwin, Vice President of Human Resources, is Hollywood Casino Joliet's Equal Employment Opportunity Officer. If you have any questions or would like information about the Company's Equal Employment Opportunity policy, feel free to contact the Officer at 927-2414.

Just as we all share the responsibility for meeting the challenges of our business objectives, each of us must assume a leading role in making our Equal Opportunity Policy and commitment to affirmative action work effectively.

Sincerely,

Lydia Garvey
V.P./General Manager

HOLLYWOOD
Casino[®]
JOLIET

2020

AFFIRMATIVE ACTION PLAN

HOLLYWOOD CASINO JOLIET

JANUARY 1, 2020 THROUGH DECEMBER 31, 2020

TABLE OF CONTENTS

Identification Page	iii
Preface	4
Implementation of Affirmative Action Plan.....	5
I. Policy Statement	5
II. Internal and External Dissemination of Policy	6
III. Responsibility for Implementation of A.A. Program.....	7
IV. Development and Execution of Additional Action Oriented Programs.....	8
V. Internal Audit and Reporting Requirements	9
VI. Guidelines Prohibiting Sex Discrimination	10
VII. Support of Community Action Programs	11
VIII. Consideration of Minorities and Females Not Currently in the Workplace	12
IX. Guidelines Prohibiting Religious and National Origin Discrimination	13
X. Guidelines Prohibiting Disability Discrimination	14
XI. Workforce Analysis	15
XII. Utilization Analysis	16
XIII. EXHIBITS	

AFFIRMATIVE ACTION PROGRAM FOR: Hollywood Casino Joliet

Hollywood Casino Joliet
777 Hollywood Blvd
Joliet, IL 60434-2789

Inclusive Dates of AAP:

January 1, 2020 to December 31, 2020

Program Completed by:

Human Resources Department

PREFACE

This Affirmative Action Plan (“AAP”) is made and implemented by Hollywood Casino Joliet (“the Company”), in compliance with the requirements of the Illinois Gaming Board pursuant to the Illinois Riverboat Gambling Act, Section 7(b)(4) and with the guidance of the Illinois Code of State Regulations.

The Company does not believe that any violation of the Illinois Human Rights Act, Title VII of the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1991, the Age Discrimination in Employment Act, the Americans with Disabilities Act, or any other applicable federal, state or local law exists within the Company. Accordingly, this AAP is not adopted or implemented to correct or remedy any actual or alleged discriminatory action or policy. Nothing herein shall be construed to require the Company to hire, decline to hire, dismiss or decline to dismiss any individual in any particular situation; to require the Company to contract with, decline to contract with, terminate a contract with, or decline to terminate a contract with any particular vendor or contractor in any particular situation; to violate any law, ordinance, or regulation relating to discriminatory practices; or to violate the provisions of any collective bargaining agreement to which the Company is a party.

This AAP contains confidential information. Copies of this AAP and all related appendices, documents and support data are made available to the Illinois Gaming Board (“IGB”) with the request that the IGB holds them totally confidential and does not release copies to any persons whatsoever. This AAP and its supporting documents contain significant confidential information which may reveal, directly, or indirectly, the Company’s business plans. The Company considers the AAP to be exempt from disclosure, reproduction, and distribution under the Illinois Freedom of Information Act, 5 ILCS 140/1 *et seq.*, and the Illinois State Records Act, 5 ILCS 160/1, *et seq.* If the IGB, the government of the State of Illinois, or any agency or subdivision thereof, is considering a request for release of this program, request is hereby made that the President of the Company be immediately notified of any and all requests received or any other contemplated release of this program which relates to information obtained by the IGB or the government from the Company. The Company further requests that anyone who has any contact with this AAP, or its supporting appendices, documents and other data, treat such information as totally confidential and that such information not be released to any person whatsoever.

Program Terminology

The terms “utilization analysis”, “underutilization” and “problem area” appearing in this AAP are used in order to reflect terminology typical to equal employment opportunity and affirmative action programs. These terms have no independent legal or factual significance whatsoever. We will use terms in total good faith in connection with the AAP. However, such usage does not necessarily signify that the Company agrees that these terms have any particular significance in connection with any particular factual situation.

Reliance on Equal Employment Opportunity Commission’s Guidelines on Affirmative Action

The Company has in good faith developed this AAP along the lines of, in conformity with, and in reliance on the Equal Employment Opportunity Commission’s Guidelines on Affirmative Action, 29 C.F.R. § 1608.1-12.

IMPLEMENTATION OF THE
AFFIRMATIVE ACTION PROGRAM

I. Policy Statement

This document establishes the Company's Affirmative Action Program with regard to equal employment opportunity. It has been designed to provide guidance and assurance for implementation of and commitment to our equal employment opportunity policy consistent with the voluntary nature of the employment relationship. The Company is committed to equal employment opportunity and affirmative action as stated in the notice to employees, which is issued annually and attached as **Exhibit A**. The Company's policy includes the following commitments:

(A) To provide equal employment opportunity to all qualified, available, and interested persons, and an affirmation of our commitment to recruit, advertise for employment, hire, upgrade, transfer, promote, lay off, terminate, pay and select for training, persons in all job classifications without regard to race, color, religion, sex, national origin, or legally protected disability or age status.

(B) To identify and analyze all areas of employment so as to further the principle of affirmative action for minorities and females. The Company is committed to apply result-oriented employment policies and practices in good faith efforts to achieve prompt and full utilization of qualified, available, and interested persons regardless of race, color, religion, sex, national origin, or legally protected disability or age status. All employment decisions will be based accordingly, as follows:

(1) Recruitment and Selection - the Company will recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, sex, national origin, or protected disability or age status.

(2) Employment Decisions - the Company will base employment decisions so as to further the principle of equal employment opportunity.

(3) Promotions - the Company will ensure that promotion decisions are in accordance with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities.

(4) Personnel Actions - the Company will ensure that all personnel actions such as compensation, benefits, transfers, lay-offs, returns from lay-offs, company-sponsored training, education, tuition assistance, social and recreational programs, will be administered without regard to race, color, religion, sex, national origin or protected disability or age status.

(5) The Vice President of Human Resources is designated as the property EEO and Affirmative Action Officer and overall Affirmative Action Program responsibility is assigned to that position.

(6) The property EEO and AA Officer will require that managers and supervisors report to him or her on the performance of EEO and AA responsibilities on a regular basis and shall monitor the procedures for implementation of this AA plan.

(7) This AAP shall be reviewed, analyzed, reaffirmed and re-issued annually.

II. Internal and External Dissemination of Policy

(A) Internal Dissemination - it is the Company's policy to periodically bring its policies of equal employment opportunity and affirmative action to the attention of all its employees. Necessary steps will be taken to assure that the Company personnel, both supervisory and otherwise, are fully apprised of the Company's equal employment opportunity policy and its affirmative action commitment. The following methods of dissemination will be utilized:

(1) A copy of the Company's equal employment opportunity policy will be included in the Employee Handbook.

(2) Meetings will be conducted with executive, management and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation of the affirmative action commitment.

(3) The Company shall conduct periodic reviews of the effectiveness of this program in which its supervisory and other involved personnel participate.

(4) Company publications, if any, will contain articles covering equal employment opportunity programs, including promotions of minority and female employees.

(5) The equal employment opportunity policy statement will be posted on Company diversity boards (see **Exhibit A**).

(6) In order that new employees will be apprised of the Company's equal employment opportunity policy and commitment to affirmative action, both will be discussed during the Company's orientation process and management training programs.

(7) Including non-discrimination clauses in all union agreements and reviewing all contractual provisions to ensure they are non-discriminatory.

(8) Picturing both minority and non-minority men and women in publications in which employees are featured.

(9) Making current employees aware of the existence of the Company's AAP and the benefits available to them.

(B) External Dissemination - The Company will promote its community posture as an equal opportunity and affirmative action employer. Specific external actions shall include:

(1) Recruitment advertising, if any, will clearly show that the Company is an equal opportunity and affirmative action employer.

III. Responsibility for Implementation of the Affirmative Action Program

The Company's General Manager has the overall responsibility to implement the Company's Equal Employment Opportunity Policy and Affirmative Action Plan. The Company, with the full support of executive management, has assigned the Vice President of Human Resources to act as EEO Officer with responsibility for implementing and monitoring overall facility performance and ensuring attainment of full compliance with the Company's policy for nondiscrimination in employment.

The responsibilities of the EEO Officer include, without limitation, the following:

(A) Developing an effective Affirmative Action Program and maintaining such program in compliance with Company policy including both internal and external communication techniques.

(B) Designing and implementing review and reporting systems to ensure awareness of the Affirmative Action Program and its benefits, as well as:

- (1) Measuring the Program's effectiveness
- (2) Determining the degree to which the Company's objectives have been attained.
- (3) Indicating any need for remedial action.

(C) Serving as the Company's representative in its dealing with federal, state and local enforcement agencies.

(D) Keeping department managers and supervisors informed of the latest developments in the entire equal employment opportunity area.

(E) Serving as liaison between the Company and minority organizations, women's organizations, and community action groups concerned with employment opportunities of minorities and women.

(F) Regularly communicating with managers, supervisors and employees to be certain that EEO policies are being followed.

(G) Reviewing the qualifications of employees to ensure that minorities and females are given full opportunities for transfers and promotions.

(H) Ensuring compliance in areas such as properly displayed posters, non-segregated facilities, comparable facilities for both sexes and full participation by minority and female employees in all Company-sponsored educational, training, recreational and social activities, if any.

(I) Making department managers and supervisors aware that their work performance is being evaluated on the basis of their equal employment opportunity and affirmative action efforts and results as well as other criteria.

(J) Ensuring that managers and supervisors take action to prevent harassment of or discrimination against any employee on the basis of his or her race, color, religion, national origin, sex, or protected disability or age status.

(K) Ensuring that the Company's job descriptions accurately set forth actual job duties and, in particular, the essential functions of the job.

(L) Monitoring the results of all scored testing to assure that the tests do not adversely impact minorities and females as compared to non-minorities and males.

IV. Development and Execution of Additional Action Oriented Programs

The Company has developed the following action-oriented programs tailored in such a manner that their proper execution will result in either an increase in the number of qualified minority and/or female applicants for any vacancies which occur, or documentation of the Company's good faith efforts to increase the number of qualified minority and/or female applicants for any vacancies which may occur.

(A) Job classifications shall be periodically reviewed, evaluated and, where necessary, updated to ensure that employees within various classifications are rated in relationship to the requirements and essential functions of the job using, where appropriate, objective factors such as relative skill, ability and experience. In addition, the Company shall ensure that job classifications are consistent for the same or related jobs.

(B) The Company will ensure that any worker specifications shall be job-related and review thereof shall include considerations of any academic experience or skill requirements to ensure that they are necessary and do not inadvertently screen out minorities or females. Where appropriate, modifications will be made in worker specifications to promote the purposes of equal employment opportunity.

(C) Any job descriptions or worker specifications used shall be made available to all members of management involved in the recruiting, screening, selection and promotion process. All personnel involved in recruiting, screening, selection, promotion, disciplinary and related processes will be carefully selected and trained to ensure that they are not biased in their personnel actions.

(D) The Company will continue to evaluate the entire selection process and will endeavor to be particularly sensitive in recruiting and hiring, especially at the entry level, to select candidates according to ability and qualifications. In its recruiting efforts, the Company shall endeavor to obtain qualified applicants including minorities and females. No department, job category or title at the Company shall be limited or closed to minorities or females.

(E) Contacts with all sources of minority and female applicants will reflect the Company's posture and emphasis on equal employment opportunity. The Company will encourage employees to refer minority and female applicants. The Company will also place help-wanted advertisements in publications directed to minorities and females. The Company is committed to contacting minority and women's organizations for referral of prospective applicants for openings which may occur. The Company has explained and will continue to explain its commitment to equal employment opportunity to representatives of recruitment sources. These explanations provide clear and concise descriptions of current and future job openings, as well as a description of the Company's selection process. The Company has made position descriptions, worker specifications and recruiting literature available to these representatives. The Company has also made arrangements with these recruiting sources for referral of applicants and feedback on the hiring status of applicants referred by these sources.

(F) The Company shall review its promotion criteria and procedures to ensure that minorities and females are given equal consideration for promotion.

(G) All Company facilities and Company-sponsored social and recreational activities, if any, are not segregated and the Company actively encourages all employees to participate in all Company-sponsored events.

(H) The company will make reasonable efforts to modify job duties or working conditions to accommodate the employment of persons with physical or mental disabilities.

(I) See **Exhibit B** for a listing of action steps that have been taken to promote diversity in the workplace.

V. Internal Audit and Reporting Requirements

As stated previously, the EEO Officer is responsible to implement the auditing and reporting system. The auditing and reporting system will be reviewed on an annual basis. The following procedures will be utilized to measure the effectiveness of the total program:

- (A) Review records of referrals, placements, transfers, promotions and terminations by department and major job groups to ensure nondiscriminatory policies are carried out.
- (B) Have a system that will measure the Company's commitments to equal employment opportunity.
- (C) Where needed, the EEO Officer will submit recommendations to improve performance to the Company's General Manager.
- (D) Review all selection, promotional, and training procedures to ensure that they are non-discriminatory.
- (E) Inform top management on a regular basis of the effectiveness of the policy and make recommendations for improvements as necessary.

In addition to the internal audit provisions set forth above, the EEO Officer will maintain records of the affirmative action efforts which include memoranda, publications and both informal and formal action-oriented steps that have been taken during the Affirmative Action Plan year not otherwise reported.

VI. Guidelines Prohibiting Sex Discrimination

The Company shall comply with the sex discrimination guidelines as follows:

(A) Advertisements in newspapers and other media, if any, shall not express a preference for members of a particular sex.

(B) An employee of either sex shall have an equal opportunity to fill any available job that he or she is qualified to perform.

(C) The Company shall not make any distinction based upon sex in employment opportunities, wages, hours, or other conditions of employment.

(D) The Company shall not deny any female employee the right to any job that she is qualified to perform in reliance upon state "protective" laws.

(E) Females shall not be penalized in any term or condition of employment and/or benefit of employment because they require time away from work for pregnancy or childbearing.

(F) Maternity disability leave is the same as any other disability leave.

(G) The Company will not specify any differences for male and female employees regarding either mandatory or optional retirement age.

(H) The Company shall not discriminatorily restrict one sex to certain job classifications.

(I) The Company will maintain a sexual discrimination policy that defines unacceptable behavior on the part of its employees and will include procedures for the reporting and investigation of sexual harassment claims.

All levels of management shall be made aware of the above rules and informed that adherence to them will be considered a part of acceptable job performance. These guidelines will be part of the Company's ongoing policies.

VII. Support of Community Action Programs

(A) Where possible, the Company will attempt to identify minority and female suppliers and contractors and will consider the utilization of their goods and services on an equal basis with others.

(B) The Company encourages all of its employees, particularly its executive and supervisory personnel, to be actively involved in community service organizations, particularly those that support the employment of minorities and females.

VIII. Consideration of Minorities and Females Not Currently in the Workforce

(A) Minorities and females not in the workforce who have requisite skills will be considered whenever suitable openings are available. Positive attempts will be made to recruit minorities and females through the Illinois Department of Employment Security, minority and women's organizations, publications which have a minority and female audience, and other resources utilizing appropriate recruiting techniques.

IX. Guidelines Prohibiting Religious and National Origin Discrimination

The Company will not discriminate against any employee or applicant for employment because of religion or national origin and will take affirmative action to ensure that qualified minority and female individuals, regardless of religion and/or national origin are encouraged to apply for any openings which may occur and that employees are treated during employment without regard to religion or national origin. These policies apply to all aspects of the employment relationship, including, but not limited to, the following: hiring, promotion, demotion, discipline, transfer, recruiting, advertising, layoff, discharge, rate of pay and selection for training.

To ensure non-discrimination with regard to religion and/or national origin, the Company is involved in the following outreach and recruitment activities:

- (A) The Company communicates its obligation to provide equal employment opportunity without regard to religion or national origin to all employees, including executives, managers and supervisors.
- (B) Internal procedures exist at the Company to implement equal employment opportunity without regard to religion or national origin.
- (C) The Company periodically informs all employees of its commitment to equal employment opportunity without regard to religion or national origin.
- (D) Contacts are made with religious and ethnic organizations for education, assistance and referral of potential employees.

The Company will make reasonable accommodations to the religious observances and practices of employees or prospective employees, provided such accommodations can be made without hardship to the Company or its other employees. The extent of our obligation is determined by considering business necessity, financial costs and expenses, and resulting personnel problems.

In implementing its EEO policy regarding non-discrimination because of religion or national origin, the Company does not discriminate against any qualified employee or applicant for employment because of race, color, religion, sex, national origin, disability status, age, or any other protected status.

X. Guidelines Prohibiting Disability Discrimination

The Company does not discriminate against any qualified individual with a disability, a perceived disability, or a record of a disability in accordance with state and federal law prohibiting discrimination on these grounds. The Company does the following to ensure that all applicants and employees are not discriminated against because of a disability, as defined above:

1. The Company communicates its obligation to provide equal employment opportunity without regard to disability status to all employees, including executives, managers and supervisors.
2. Internal procedures exist at the Company to implement equal employment opportunity without regard to disability status.
3. The Company accurately develops and regularly reviews all job descriptions, specifically validating the essential functions of each job, in order to open as many jobs as possible to qualified individuals with a disability.
4. The Company periodically informs all employees of its commitment to equal employment opportunity without regard to disability status.
5. Recruitment sources are used to provide equal employment opportunity without regard to disability status.
6. The Company reviews employment records to determine the availability of promotable and transferable disabled employees.

The Company reasonably accommodates qualified individuals with a disability except where such accommodation causes undue hardship on the conduct of the Company's business. The extent of the Company's obligation is determined by considering business necessity, financial costs and expenses and resulting personnel problems.

In implementing its EEO policy regarding non-discrimination because of an individual's disability, the Company does not discriminate against any qualified employee or applicant for employment because of race, color, religion, sex, national origin, disability status, age, or other protected basis.

XI. Workforce Analysis

Labor Market statistics are provided by the Illinois Department of Employment Security based upon the US Census Bureau, 2017 American Community Survey and 2006-2010 American Community Survey. A copy of these statistics for the relevant recruitment area which is, Will County compared to the Company is attached as **Exhibit C**. It is pertinent to note that the external availability information does not reflect the availability of minorities and females in the jobs specific to the gaming industry, but is broadly categorized. Therefore, it is not possible to determine with any precision the nature of the skills or abilities possessed by those minority and female persons in the workforce. This makes it difficult to determine whether the statistics reflect candidates for positions with similar content, wage rates and opportunities to the positions in the Company. The Company's analysis of availability is thus necessarily inexact.

XII. Utilization Analysis

Utilization will be reviewed annually to evaluate the continuing effectiveness of the Company's affirmative action process. The Company will consider the placement results that can reasonably be expected from putting forth every good faith effort to make the overall program work. Minority and female employees and applicants will be treated equally in all matters of consideration. Qualifications for employment or promotion will be the overriding consideration. A copy of the Utilization Analysis is attached as **Exhibit C**.

All department managers and supervisors will be made aware of the Company's objectives, and with the annual review of their EEO efforts, minority and female placement will be properly studied.

(Letterhead)

EXHIBIT A

March 2020

TO: All Hollywood Casino Joliet Team Members

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

Hollywood Casino Joliet is an Equal Employment Opportunity employer. Therefore, the rights of all applicants and employees are respected. Equal Employment Opportunity rights apply in the following areas: race, color, religious belief, sex, sexual orientation, veteran status, age, national origin, disability, and marital status. Discrimination on the basis of any of the above is strictly prohibited.

The Company's EEO policies will be applied in all aspects of employment, including recruitment, selection, compensation, training, utilization, work assignment, upgrading, transfer, advancement and termination of employment. These rights are communicated to all employees.

Providing that reasonable accommodations can be made to assure productivity; Hollywood Casino Joliet hires the physically and mentally challenged and does not discriminate against any person because of disability.

Hollywood Casino Joliet complies with all applicable federal, state and local laws, regulations, and executive orders implementing Equal Employment Opportunity objectives, both as to the letter and the spirit of the law.

OPEN DOOR POLICY

Our management team is always willing to listen to your concerns or suggestions. We believe that every person who works at, visits, or patronizes our establishments should be treated with respect at all times. In the event there is a matter you feel needs attention, please follow these steps:

- Discuss it first with your immediate supervisor. If your concern/complaint involves your immediate supervisor, discuss the matter with your department manager.
- If the issue has not been resolved within a reasonable length of time, talk with our department manager or director.
- If there is something you feel cannot be discussed with your supervisor or department manager, contact the Human Resources office at (815) 927-2083 or 927-2414.

We will give all suggestions and complaints full consideration. There will be no discrimination or reprisal against any employee because he or she has advanced an issue. All investigations will be kept in strictest confidence except to the extent necessary to conduct the investigation.

SEXUAL AND OTHER UNLAWFUL HARASSMENT

It is the policy of Hollywood Casino Joliet to maintain a working environment free from all forms of unlawful discrimination and harassment. It will be a violation of Company policy for any employee to unlawfully harass another individual in the workplace. Violation of this policy shall be considered grounds for disciplinary action up to and including termination.

Unlawful harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as sex, color, race, ancestry, religion, national origin, age, physical handicap, medical condition, disability, marital status, veteran status, citizenship status, or other legally protected group status. Hollywood Casino Joliet will not tolerate unlawful, harassing conduct that affects tangible job benefits, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile or offensive working environment.

OUR COMMITMENT

Each of us has a responsibility to support these objectives and to ensure that this policy is fully implemented within our Company.

David Jadwin, Vice President of Human Resources, is Hollywood Casino Joliet's Equal Employment Opportunity Officer. If you have any questions or would like information about the Company's Equal Employment Opportunity policy, feel free to contact the Officer at 927-2414.

Just as we all share the responsibility for meeting the challenges of our business objectives, each of us must assume a leading role in making our Equal Opportunity Policy and commitment to affirmative action work effectively.

Sincerely,

Lydia Garvey
V.P./General Manager

Exhibit B

The following goals and plans of action will create a workplace that embraces diversity as a key element in this organization.

Goal #1

Hire and promote applicants based on merit and equality while focusing on recruiting, developing and hiring a diverse workforce.

Plan of Action A: Advertise job opportunities with organizations that target women, minorities, and people with disabilities.

2019 Affiliations, Accomplishments, and Initiatives: Weekly Job Postings are sent to: Elgin Community College, Illinois Valley Community College, Kankakee Community College, Kishwaukee College, McHenry County College, Moraine Valley Community College, Oakton Community College, Prairie State College, South Suburban College, Triton College, Waubensee Community College, Catholic Charities Diocese of Joliet. College of DuPage, Joliet Junior College, Cornerstone Services, Joliet Cornerstone Services, Operation Job Ready Veterans, Governor State University, IDES, University of St. Francis, Workforce Services Division of Will County, Rasmussen College, Purdue University Calumet and Workforce Services Division of Grundy County.

2020 Projected Action Steps: Continue to establish relationships with the above mentioned as well as look for new organizations to build relationships with, focusing on targeting a more diverse workforce. Additionally, we have worked and will continue to work with the Illinois Workforce Division of Will County to hire veterans.

Hollywood Casino Joliet, in conjunction with our corporate Talent Acquisition team, continues to send our weekly job openings to the above-mentioned agencies/schools and is actively looking for more organizations to send our postings to. We have continued to further strengthen our relationship with Joliet Junior College and in addition to directly recruiting staff from the culinary program.

Plan of Action B: Work with community organizations that represent minorities, women, and people with disabilities to assist in preparing their clients for the workforce.

2019 Affiliations, Accomplishments, and Initiatives: The following scholarships were sponsored by Hollywood Casino: Lewis University- \$5,000, Joliet Junior College- \$5,000, University of St. Francis- \$5,000.

2020 Projected Action Steps: Continuously look for ways to work with community organizations to help the community prepare our workforce.

Hollywood Casino Joliet actively works with any agency that requests assistance in hiring individuals with diverse backgrounds and disabilities. We continuously work with job coaches at Trinity to ensure our employees from that agency are excelling in their positions.

Plan of Action C: Work with community organizations that have relationships with our retired workforce that would like to get back to work.

2019 Affiliations, Accomplishments, and Initiatives: In 2019, we continued to establish relationships with several organizations geared toward assisting the retired workforce.

2020 Projected Action Steps: Our property will assign a new member to serve on the board of Senior Services of Will County. This candidate will review our job postings and hiring practices with them so they can share our information with their members.

Plan of Action D: Track applicant flow by monitoring a survey in the application process asking applicants to voluntarily indicate race and gender. This survey is kept separate from the employment application.

This report is available electronically through our online application system. We look at this report to see how diverse our applicant pool is and ensure our hiring practices match the ratios.

2019 Affiliations, Accomplishments, and Initiatives: All data is collected by Human Resources and monitored.

2020 Projected Action Steps: Continuously monitor hiring and EEO Statistics to ensure a diverse workforce is being hired.

Every quarter Human Resources down loads an EEO report from our HRIS system to track and monitor our EEO statistics. This report is also reviewed by the Vice President/General Manager and Vice President of Human Resources.

Goal #2

We will continue to recruit candidates for the Management LEAP Intern program in cooperation with our corporate management team. This program is designed for recent graduates who are interested in building a career in the gaming industry. We value the addition of new energy, talent and expertise into our organization. This 18 month program has been developed to mold Penn's leaders of tomorrow and continue our company's success well into the future. Our program will provide hands-on-training, mentoring and real world experience which will provide the necessary tools to be successful at Hollywood Casino Joliet.

Plan of Action A: Maintain Hollywood Casino Joliet as an employer of choice for potential Management Interns from top universities throughout the United States.

2019 Affiliations, Accomplishments, and Initiatives: Our property did not have a Management LEAP Intern in 2019.

2020 Projected Action Steps: Corporate continues to recruit for Management LEAP Interns.

Goal #3

Ensure our employees are fully trained on the Company's Sexual and other unlawful harassment policy.

2019 Affiliations, Accomplishments, and Initiatives: All new hires in orientation are trained on the Company's sexual harassment and other unlawful harassment policy.

2020 Projected Action Steps: In addition to sexual harassment training that is covered in orientation, supervisors and above meet one on one with a Human Resources Business Partner to cover policies more in depth. During this meeting, the Sexual Harassment and discrimination policy is also covered and it is discussed what role they play in ensuring our workplace is free from harassment and discrimination.

Goal #4

Hollywood Casino Joliet will continue to make donations to organizations and have all employees become more actively involved in the Joliet Community.

Plan of Action A: Hollywood Casino Joliet will continue to provide community service support to local non-for profit agencies that help to better the Joliet community.

In 2019, Hollywood Casino Joliet continued to support our community by making direct contributions to organizations and encouraging our employee base to donate their time for community causes.

2019 Affiliations, Accomplishments, and Initiatives: Hollywood Casino continued to encourage our employees to volunteer and/or contribute within the local community. In 2019 the company and our employees donated \$10,971 to the American Cancer Society & Relay for Life. An additional \$4,209 was donated to Guardian Angel, Crisis Line and Susan G. Komen foundation through company sponsored events.

2020 Projected Action Steps: We will continue to offer volunteer events for our employees to participate in.

When looking for organizations to volunteer our time and get our employees involved, we continuously look for agencies that assist in bettering the Joliet community, such as Daybreak Center of Joliet.

Goal #5

Retain and promote qualified employees and create a work environment where employees can realize their full potential.

Plan of Action A: Encourage professional development by providing tuition reimbursement.

We currently have 4 cast members receiving tuition reimbursement to complete their undergraduate or graduate degree. In 2019, we had 5 cast members utilize our tuition reimbursement program.

2019 Affiliations, Accomplishments, and Initiatives: Hollywood Casino Joliet will work with any University to help assist employees with their educational costs through our tuition reimbursement plan. Our tuition reimbursement policy reflects \$3,000.00 for full-time cast members and \$1,500.00 for part-time cast members.

2020 Projected Action Steps: We will continue to remind cast members of our tuition reimbursement program and encourage them to reach their full potential through education.

Plan of Action B: Encourage supervisors to realize their full potential and continue to grow into management ranks.

2019 Affiliations, Accomplishments, and Initiatives During 2019, Hollywood Casino Joliet Corporate iLead program was being revised and a new leadership training will be rolled out in 2020.

2020 Projected Action Steps: We will focus our monthly manager strategy meetings on development of management staff to become better leaders within our organization. We will also rollout new Corporate training classes for supervisors and above.

EXHIBIT C

**WORKFORCE ANALYSIS OF
WILL COUNTY/HOLLYWOOD CASINO JOLIET**

I – Total	Will County Total Employment Population* Hollywood Casino Joliet	364,671 436
II – White	Will County Total Employment Population Percentage White Hollywood Casino Joliet	274,120 75.2% 64%
III - Black	Will County Total Employment Population Percentage Black Hollywood Casino Joliet	39,209 10.8% 18%
IV – Native American	Will County Total Employment Population Percentage Native American Hollywood Casino Joliet	685 0.2% 0%
V - Asian/ Pacific Islander	Will County Total Employment Population Percentage Asian/Pacific Islander Hollywood Casino Joliet	19,097 5.2% 0%
VI - Hispanic	Will County Total Employment Population Percentage Hispanic (Hispanic, Any Race) Hollywood Casino Joliet	57,701 15.8% 11%
VII – Two or more races	Will County Total Employment Population Percentage Two or More Races Hollywood Casino Joliet	6,283 1.7% 3%
VI - Female	Will County Total Employment Population Percentage Female Hollywood Casino Joliet	170,233 46.7% 52%

*Hispanic, Any Race

Exhibit C

UTILIZATION ANALYSIS
WILL COUNTY/HOLLYWOOD CASINO JOLIET
As of 12/31/2019

FEMALE

		Total	White	Black	Hispanic	Other
Officials and Managers	Will	35.4%	26.2%	3.8%	3.0%	2.5%
	Hollywood	44%	31%	13%	0%	0%
Professionals	Will	66.1%	52.2%	6.8%	3.7%	3.3%
	Hollywood	52%	40%	4%	4%	4%
Technicians	Will	54.6%	38.2%	6.3%	6.3%	3.8%
	Hollywood	0%	0%	0%	0%	0%
Sales	Will	47%	33.0%	5.0%	6.1%	2.9%
	Hollywood	83%	67%	17%	0%	0%
Office and Clerical	Will	75.3%	57.1%	8.0%	8.4%	1.9%
	Hollywood	71%	29%	26%	6%	11%
Craft Workers	Will	2.4%	1.6%	.2%	.4%	.2%
	Hollywood	7%	7%	0%	0%	0%
Operatives	Will	28.6%	12.4%	3.4%	11.3%	1.4%
	Hollywood	0%	0%	0%	0%	0%
Laborers	Will	18.2%	11.8%	.9%	4.9%	.6%
	Hollywood	0%	0%	0%	0%	0%
Service Workers	Will	66.2%	41%	9.9%	12%	3.2%
	Hollywood	55%	32%	12%	7%	4%

Exhibit C

**UTILIZATION ANALYSIS
WILL COUNTY/HOLLYWOOD CASINO JOLIET
As of 12/31/2019**

BOTH SEXES

		Total	White	Black	Hispanic	Other
Officials and Managers	Will	100%	79%	8.1%	6.7%	6.3%
	Hollywood	100%	72%	16%	8%	5%
Professionals	Will	100%	78.9%	10.2%	5.7%	5.1%
	Hollywood	100%	80%	8%	4%	8%
Technicians	Will	100%	70.6%	9.2%	11.4%	8.8%
	Hollywood	100%	86%	14%	0%	0%
Sales	Will	100%	75%	8.4%	11.1%	5.6%
	Hollywood	100%	83%	17%	0%	0%
Office and Clerical	Will	100%	73.1%	11.2%	12.2%	3.7%
	Hollywood	100%	49%	26%	9%	17%
Craft Workers	Will	100%	77.3%	3.1%	18.2%	1.4%
	Hollywood	100%	71%	14%	14%	0%
Operatives	Will	100%	51.5%	12.7%	32.5%	3.2%
	Hollywood	0%	0%	0%	0%	0%
Laborers	Will	100%	51.9%	11%	35.1%	1.9%
	Hollywood	0%	0%	0%	0%	0%
Service Workers	Will	100%	59%	14.9%	20.9%	5.1%
	Hollywood	100%	62%	19%	13%	5%



December 28, 2020

Illinois Gaming Board
Tammy Compton/Acting Deputy Administrator
Financial and Audit Unit
801 S. 7th Street, Suite 400S
Springfield, IL 62703

Re: Annual Report on Diversity

Par-A-Dice Gaming Corporation, owned and operated by Boyd Gaming Corporation is a leading diversified owner and operator of gaming entertainment properties. We embrace diversity in every aspect of our business from our team members, to our procurement, philanthropic endeavors and our customers.

In response to your request for the properties annual report on diversity, please see results below.

❖ **A good faith affirmative action plan to recruit, train, and upgrade minority persons, women and persons with disability in all employment classifications;**

To ensure that its workforce reflects its commitment to recruit, hire and train minorities, the Par-A-Dice employs a variety of programs which have proven to be successful.

Recruitment

To ensure the recruitment of women and minorities, Par-A-Dice has implemented the following programs:

- Par-A-Dice works with local community groups and governmental agencies, so that women and minorities are recruited for all open job categories.
- All employment advertisements specifically state that Par-A-Dice is an equal opportunity employer.
- Employment advertisements are run in minority papers as well as the local newspapers.
- A property evaluation of the team member population is completed biannually using a process that parallels approved affirmative action programs. The results are evaluated to establish areas

where women and/or minorities may be under utilized and an action plan is created when warranted.

Hiring

Only selected department recruiters are permitted to conduct employment interviews after receiving training. Each recruiter is required to develop a standard set of questions for each position. Their selection interview criteria is based upon the applicable job description and all inquiries are job-related and non-discriminatory. All recruiters are specifically instructed that is illegal to discriminate against an applicant based on the applicant’s race, national origin, sex, marital status, parental status or any other protected status.

Training

Par-A-Dice offers a wide variety of training programs with women and minorities being provided equal access to all programs. Annually, Managers and Supervisors receive on-going training to enhance their work and improve their knowledge of policies and procedures. Front-line team member training is focused on activities in their respective departments. In addition to property-wide training, each department provides specialized training concerning its individual operations. In addition, technical instruction is provided on a departmental and position specific basis. All newly hired team members are provided instruction, which includes training of employment policies, benefits, safety, guest service and orientation of Par-A-Dice’s Internal Controls.

Current Demographics

Information about the Tri-County (Tazewell, Peoria and Woodford Counties) was obtained from the Census 2010 from the Tri-County Regional Planning Commission Office in Peoria, IL. The following chart shows the demographics of the Tri-County MSA. The demographics do not include Sangamon County.

2020	Par-A-Dice	Peoria County	Tazewell County	Woodford County
Male	51.45%	48.39%	49.28%	49.40%
Female	48.55%	51.61%	50.72%	50.60%
Total	100%	100%	100%	100%
Caucasian	75.36%	74.43%	96.18%	97.36%
African American	10.15%	17.71%	1.01%	0.48%
Asian	8.21%	3.14%	0.74%	0.55%
Native American	0.72%	0.28%	0.27%	0.19%
Other Races Alone	2.90%	1.62%	0.53%	0.33%
Two or More Races	2.66%	2.82%	1.27%	1.09%
Total	100%	100%	100%	100%

❖ **The total dollar amount of contracts that were awarded to businesses owned by minority persons, women, persons with disability and veteran owned;**

Minority Owned/Minority Woman Owned = \$458K

Woman Owned = \$549K

Disabled Owned = \$50K

Veteran Owned = \$3K

❖ **The total number of businesses owned by minority persons, women, and persons with a disability and veteran owned that were utilized by the licensee;**

Minority Owned/Minority Woman Owned = 30

Woman Owned = 40

Disabled Owned = 6

Veteran Owned = 6

❖ **The utilization of businesses owned by minority persons, women, and persons with disabilities and veteran owned during the preceding year;**

Minority Owned/Minority Woman Owned = 11.8%

Woman Owned = 14.1%

Disabled Owned = 1.3%

Veteran Owned = .1%

❖ **The outreach efforts used by the licensee to attract investors and businesses consisting of minority persons, women, persons with a disability and veteran owned;**

1. Updated the 'Vendor Opportunities' section of the PAD website to include: Bid opportunities for Contracts, Bulk Purchases and Services. In addition, instructions on 'How to Become a Vendor' through the Supplier Portal Application and contact information for property procurement team have been added to the site.
2. Placed an Ad in the State Newspaper.
3. Procurement regularly follows-up with businesses that successfully register on the Boyd Gaming Supplier Portal, in addition to reaching out to businesses that have begun the registration process and may have questions.
4. Communicated the importance of increasing the utilization of WBE, MBE, DBE and VBE businesses with our Procurement team, our Leadership team as well as Corporate Procurement.
5. Joined forces with Corporate Procurement as well as the Corporate Design & Construction team to intensify the pursuit of WBE, MBE, DBE and VBE businesses for capital projects.

6. Held Diversity meetings with property Team Leaders as well as Corporate Diversity mentors in an effort of keeping communication open related to diverse procurement, hiring and charitable giving efforts.
7. The PAD Compliance Manager communicates with other IL Casino's to network and share potential WBE, MBE, DBE and VBE businesses newly acquired.
8. The property utilizes an internal Special Preference form to award a WBE, MBE, DBE or VBE vendor with an opportunity, though they may not have been the lowest bidder.
9. The Procurement team regularly searches the internet for database lists of WBE, MBE, DBE and VBE businesses through: IL Department of Central Management Services, Minority Supplier Development Council, Local Chamber of Commerce organizations
10. The property maintains memberships and relationships with local Chamber of Commerce organizations to continually network and encounter fellow business owners in our community and surrounding area.
11. Bid requests include an opportunity to at least one MBE, WBE, DBE or VBE when available.

Our commitment to diversity strengthens our company, our communities and our people. We are committed to recruiting, training and upgrading minorities, women and persons with disabilities in all employment classifications. In addition, we are dedicated to increasing the utilization of minority owned businesses, female owned businesses and businesses owned by persons with disabilities in the coming years.

Please contact me if you are in need of further information.

Respectfully,



Cori Rutherford

V.P. & General Manager



December 30, 2020

Tammy Compton
Acting Deputy Administrator
Financial and Audit Unit
Illinois Gaming Board
801 South Seventh Street
Suite 400 – South
Springfield, IL 62703

RE: Annual Diversity Reporting – 230 ILCS 10/7.11

Dear Ms. Compton,

This letter is to address the Annual Diversity Reporting requirements pursuant to 230 ILCS 10/7.11.

Employment Diversity:

All River's applications include an EEO Information section with candidates informed of equal employment opportunity and affirmative action. The River's employment site includes a direct link to our company's Diversity & Inclusion Mission Statement which states: "Midwest Gaming is devoted to building and nurturing a diverse and inclusive environment and is committed to equal opportunity employment and participation by all Team Members in all employment classifications throughout the organization."

River's recruiting team directly communicates active job openings on a monthly basis to over 25 local workforce partners including:

- RefugeeOne: RefugeeOne resettles hundreds of refugees every year and assists refugees in learning English and preparing for the American workforce.
- CARA: Since 1991, Cara has helped people affected by poverty to get and keep quality jobs.
- Search, Inc: Search empowers individuals with intellectual disabilities to achieve their full potential and provides support through adult learning & employment programs.
- Silver Fork: Silver Fork offers a culinary arts & job readiness program hosted by the Center on Halsted, the Midwest's most comprehensive community center dedicated to advancing community and securing the health and well-being of the LGBTQ people of Chicagoland.

RIVERS CASINO

- Pan African Association: Pan African provides tools that enable self-sufficiency to enable Chicago's refugees and immigrants to come together as a cohesive group.
- Asian Human Services: AHS focuses on culturally comprehensive human services that help people become employed using comprehensive job-related services that place hundreds of job-seekers into full-time and part-time employment every year.
- Primary sponsor of the Des Plaines Chamber of Commerce's Veteran's Back to Work Bootcamp supporting local veterans with education and mentorship as they enter the local workforce.
- Various Veteran Programs including Jesse Brown VA, Recruit Military, and Veteran Affairs.

Below is River's December 2020 employee population compilation:

Ethnicity	Count	% of Total
African American	209	15.5%
Asian	261	19.4%
Caucasian	530	39.3%
Hispanic	300	22.3%
Other	48	3.6%
Total	1348	

Gender	Count	% of Total
Female	588	43.6%
Male	760	56.4%
Total	1348	

Procurement Diversity:

Below is a breakdown of the total 2020 estimated amounts of contractual vendor spend awarded to businesses owned by minority persons (MBE), women (WBE), persons with a disability (DBE), and veterans (VBE), collectively M/W/D/VBE, along with the number of vendors utilized in each category for 2020 projection. River's annual spend was directly impacted by operating restrictions as a result of the Covid-19 pandemic including the first property closure from March 16, 2020 through June 30, 2020 and the second property closure from November 20, 2020 – January 9, 2021 (estimated opening date) which resulted in a reduction in the volume of goods and services purchased in 2020 and limitations on interactions with suppliers through in-person vendor resource fairs.



2020

<i>2020 Stats:</i>	MBE	WBE	DBE	VBE	Total M/W/D/VBE	Total	Total Spend - with IGB Allowed Exclusions
First Tier Contractors	21	29	1	2	53	559	325
Total Estimated 2020 Spend	\$2,957,730	\$3,091,900	\$ 14,403	\$ 246,894	\$ 6,310,926	\$ 63,213,320	\$ 26,538,097

<i>2020 Spend Percent Estimates:</i>	MBE	WBE	DBE	VBE	Total M/W/D/VBE
% of Total - w/IGB Allowed Exclusions	11.1%	11.7%	0.1%	0.9%	23.2%
% of Total - less expansion-related construction	23.2%	18.6%	0.1%	2.3%	44.3%
% of Total	4.7%	4.9%	0.0%	0.4%	10.0%

Outreach initiatives that Rivers took over the course of 2020 to help expand its vendor pool of certified M/W/D/VBE vendors included:

- **Memberships:** Rivers maintained its memberships of the following groups during 2020 in effort to establish additional resources in identifying M/W/D/VBE certified vendors:
 - **Chicagoland Business Leadership Network (CBLN):** This network is identified as an organization focused on disability inclusion. Rivers continues to be a member of this organization.
 - **Illinois Black Chamber of Commerce (ILBCC):** Rivers continues to be a member of this organization. As an ongoing initiative, Rivers continues to contact ILBCC to seek opportunities to identify MBE vendors to include during the purchasing process.
 - **Illinois Hispanic Chamber of Commerce (IHCC):** Rivers continues to be a member of this organization. As an ongoing initiative, Rivers continues to contact IHCC to seek opportunities to expand Rivers’ MBE vendor pool.
 - **Chicago Minority Supplier Diversity Council (MSDC):** Rivers continues to be a member of this organization. Rivers has exhibited at their annual event every year since the casino opened in 2011 but was unable to this year due to the event being cancelled due to Covid19.
- **Vendor Partnerships:** In 2020, Rivers outreach to increase and identify potential suppliers included – Disabilities: IN (DBE); Black Contractors United (MBE); Abilities Expo (DBE); Service-Disabled Veteran Owned Small Business (D/VBE). Additionally, Rivers worked with multiple vendors to source product for reopening safely, in which Rivers spent approximately \$102K with diverse companies related to the procurement of personal protective equipment or PPE.
- **Advertising:** In effort to continue to attract diversified vendors in 2020, Rivers advertised in the official State newspaper, The Breeze Courier.

RIVERS CASINO

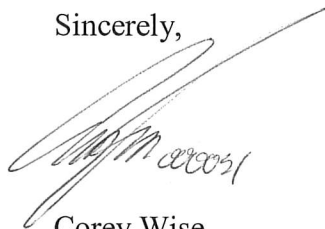
- **Attendance at Targeted Events:** Due to the Covid19 pandemic, many face-to-face interactions with River's diversity partner organizations were cancelled, however, the following event was replaced with a video conferencing option:
 - **Hollywood Casino – Joliet:** In November 2020, Rivers Casino participated in a panel discussion conducted during the virtual M/W/D/VBE conference event. Many of Rivers current M/W/D/VBE vendors were invited to attend the presentation.

Diversity and Inclusion Taskforce

River's Diversity and Inclusion Taskforce was created to assist in the oversight and execution of River's mission to promote and foster a collaborative work environment that celebrates and respects the diversity of River's Team Members, guests and community partners. In 2020, the Taskforce organized a team member Diversity Celebration to kick off the year, as well as events for Black History Month in February and International Women's Day in March. Due to the Covid-19 environment and the casino, several additional team member celebrations and planned community events were cancelled.

Please contact me if you have any questions and/or concerns regarding this report at 847-768-5211.

Sincerely,



Corey Wise
General Manager
Rivers Casino – Des Plaines

CC: Frank Scanio, IGB
Jill Wilcox
Stephanie Budnyk
James Bader



Amber Crowley
Illinois Gaming Board
160 N. LaSalle Ste. 300
Chicago, Illinois 60601

12/29/20

Ms. Crowley,

Pursuant to 230 ILCS 10/7.11, below is the Annual Report on Diversity for Jumer's Casino & Hotel for year ending 12/31/20.

(i) Affirmative Action Plan:

- a. Jumer's Casino & Hotel's policy of equal employment opportunities is based on its respect for applicants and associates as individuals and upon a belief that everyone deserves an equal opportunity to succeed. Jumer's Casino & Hotel recruits, hires and promotes associates on the basis of job requirements and the individual's performance and meeting the essential job qualifications of the position. We are an equal opportunity employer and proudly encourage all minorities, female and disabled individuals to apply for positions within our workforce. Jumer's Casino & Hotel utilizes many different resources to attract, hire, encourage and retain applicants. We utilize the internet (i.e. Ziprecruiter), local newspapers, radio, television, our own website and social media outlets, career fairs, Quad City Non-Profit organizations, the Illinois Department of Employment Security, The Iowa Workforce, local colleges and recruitment firms. Through these various resources, we recruit locally, greater than 90% of all position openings at Jumer's Casino & Hotel. Periodically, we must broaden our search area to obtain qualified candidates for certain, highly or uniquely skilled positions. In these rare instances, we may utilize recruitment firms or national industry publications.
- b. Our Human Resources Department work to ensure our positions are posted to several different entities in the Midwest, as mentioned above. They concentrate on and reach out to many local, regional and national entities to post and recruit all of our open positions. We have created relationships with these individuals that are lasting. If they have a potential candidate that they believe may be a good fit for Jumer's Casino & Hotel, they call our Human Resources Department and discuss the opportunity and make arrangements to discuss this potential associate further, if appropriate. Although we use these sources to seek out the best applicants, we prefer to hire and promote from within the organization. This demonstrates to our associates, most of whom are local, Illinois residents, that Jumer's Casino & Hotel believes in succession planning; upward mobility from within the organization. Delaware North, Jumer's parent company, has several properties across the United States and globally as well.



We offer associates the ability to apply for any position that is posted within Delaware North, a global leader in the hospitality industry. This, in turn, allows us the ability to hire another local applicant to fill the vacated, promoted associate's position or promote another individual from within the Company.

(ii) Total Dollar Amount of Contracts awarded to businesses owned by minority persons, women, and persons with disability in 2020 (Actual Jan-Nov + Projected Dec):

a.

2020	Category	Actual Spend	% of Total Non-Exempt
	Veteran (VET)	\$24,747	0.72%
	Disabled (DBE)	\$96,084	2.81%
	Minority (MBE)	\$1,206,660	35.29%
	Women (WBE)	\$490,563	14.35%
	Total	\$3,419,664	53.16%

(iii) Total Number of Businesses owned by minority persons, women, and persons with disability utilized in 2020:

a.

2020	Category	Total Vendors
	Veteran (VBE)	2
	Disabled (DBE)	1
	Minority (MBE)	6
	Women (WBE)	19
	Total	28



(iv) Total Number of Businesses owned by minority persons, women, and persons with disability utilized in 2019:

a.

2019	Category	Total Vendors
	Veteran (VBE)	1
	Disabled (DBE)	3
	Minority (MBE)	10
	Women (WBE)	21
	Total	35

(v) Outreach efforts used to attract investors and businesses consisting of minority persons, women, and persons with a disability:

- Documented and shared a nationwide listing, sorted by State, of over 3,500 DBA/Veteran owned vendors for potential review/consideration.
- Reviewed Illinois Department of Central Management Services website and identified vendors registered as Persons with Disability Business Enterprise (PBE), and Persons with Disability Business Enterprise (PBE).
- Updated Jumer's website to accommodate easy access of Jumer's Purchasing Department contact.
- Advertised in the official State of Illinois Newspaper- Breeze Courier (November 05, 2020) towards soliciting further vendor diversity.
- Communicate with other Illinois Casinos to share vendor lists/best practices. To date, 1 new veteran vendor was identified.

I am available if you have any questions.

Thank you,



176099371

Travis Hankins
General Manager
Jumer's Casino & Hotel
309-756-4619
travish@jumerscri.com