

Plainridge Park Casino Strategic Plan To Engage & Recruit the Diverse, Under & Unemployed Workforce Population

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Introduction

Penn National Gaming Inc. (Penn) has developed this comprehensive Workforce Diversity Plan for ongoing development of its workforce at Plainridge Park Casino in Plainville, Massachusetts. The plan is designed not only to provide equal opportunity to individuals identified in traditionally disadvantaged groups but also to promote a workforce that is reflective of our surrounding community. This plan will be implemented by engaging in aggressive outreach, recruitment and training in order to identify motivated and qualified individuals to join our team.

The inclusive diversity philosophy of Plainridge Park Casino is intended to be more far reaching than simply the inclusion of minorities, women and veterans. As part of our commitment to our local host and surrounding communities, we have also set an aggressive local hiring goal that will also serve to address local unemployed and underemployed challenges.

Since the initial draft of this plan, as presented to the MGC on June 26, 2014, Penn's human resources and operations teams have had an active outreach and coordination schedule.

In July we met with and toured two Career Centers ,Fall River and Framingham, and are confident that they have the ability to supply us with an applicant pool that meets our needs. We will also be meeting with the New Bedford Career Center in the near future. During our visit, we met with many of the staff, including their veterans reps, and had the opportunity to both learn about the services they provide and educate them on our hiring needs and career paths within the casino industry. We also met with Massasoit and Bristol Community Colleges and continue to believe they will be a tremendous asset as we establish and implement our workforce training programs. We have maintained our communications with the Consortium and August 13, 2014 is our next scheduled Consortium meeting.

Penn National Gaming's Equal Opportunity Policy

To give equal employment and advancement opportunities to all employees and applicants, the Company makes employment decisions based on each person's performance, qualifications, and abilities. We do not discriminate in employment opportunities or practices on the basis of race, color, religion, gender, national origin, age, disability, sexual orientation, or any other characteristic protected by law. In addition, the Company will make reasonable accommodations for qualified individuals with known disabilities.

The Equal Employment Opportunity policy covers all employment practices, including selection, job assignment, compensation, discipline, separation of employment, and access to benefits and training.

Outreach & Communications

Developing relationships with community and state-based organizations is integral in our ability to succeed in hiring a local and diverse workforce that is reflective of the community and region around us.

Penn National's team has already taken an aggressive approach to begin collaboration with several of these organizations and educational institutions. We began this process prior to licensure by hosting an Employment Information Fair on November 13, 2013, and advertised the event in the area publications and via social media. Approximately 200 potential applicants from Plainville and the designated surrounded communities attended the Fair. In addition to this first event, Penn officials (to date) have met with representatives from:

- The Massachusetts Department of Labor and Workforce Development and its related departments including,
 - Department of Career Services
 - o Department of Workforce Development
 - Its local career center agencies, including the Greater New Bedford Career Center, Framingham and Fall River
 - In addition, we plan to reach out to the regional Workforce Investment Board(s) relative to our region and explore with them how we can be a productive addition to their efforts.
- Careers Training Institute. Penn was one of the first signatories to their Memorandum of Understanding for gaming operators across the Commonwealth.
- Bristol Community College
- Massassoit Community College
- Veterans, Inc.
- Vet.org
- Employment & Training Resources
- Massachusetts Gaming Commission's Office of Workforce Development & Diversity
- New England Area Conference NAACP
- Hosted an initial meeting with the Consortium at Plainridge Park in April 2014. We have scheduled a second meeting in August and will meet with this group on a quarterly basis until the first full year of operations is complete at the facility. After that, the meeting schedule shifts to a semi-annual basis.

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We conducted these early meetings with the goal of:

- Identifying existing educational institutions with programs that allow graduate skillsets to transfer to the needs of our facility;
- Identifying educational institutions where we can foster longer term partnerships in existing career training programs (such as culinary programs);
- Identifying organizations in both the education and workforce development communities that have an existing communications portal that can provide job advertising services;
- Engaging organizations that have existing or can create partnering opportunities for events like job information sessions and job fairs;
- Understanding local demographics, available labor pool and challenges with recruiting qualified team members, understanding under and unemployed dynamic in the local area.

We will continue our relationships with these organizations while pursuing relationships with others with the goal of reaching as broad a group of potential employees as possible during our initial hiring phase as well as throughout the ongoing operations at Plainridge Park Casino.

In addition to these communication and professional training partnerships, we will also conduct a broader advertising program for our hiring program that will include paid media advertising in local and minority-specific publications as well as targeted online and social media advertising.

Tapping into the resources available through the MA Department of Labor and Workforce Development will be key for recruiting of our entire workforce, but will be critical for providing opportunities for under and unemployed individuals. In the coming months, we will be conducting workshops with staff from our local career centers educating them on the gaming industry and available opportunities that will exist at Plainridge. These centers will act as a critical talent pipeline for talent for our recruiting needs, particularly for our ability to tap into the under and un-employed populations.

Along with training the staff at the Regional Career Centers, we will be conducting job information sessions/job fairs in all of our host communities, various career centers, as well as Massasoit and Bristol Community Colleges. The goal of these meetings is to educate potential employees on the various positions within the casino and qualifications for employment at the casino.

Penn will also establish an offsite career center for the purposes of creating a central location for our hiring program. Applicants can submit resumes there or online and interviews will be conducted at this office throughout the hiring timeframe. A separate

career center area will be housed in the permanent facility, allowing ongoing access by interested individuals seeking employment and career opportunities. The Plainridge career center website became operational and available to the public in July and will grow as construction progresses and opening day approaches. The site will remain in operation through the life of the facility's operation. Below is a current timeline for our workforce outreach programs and services:

Updated Timeframe:

July: Career Website Active September 2: Career Center open

September 2: Jobs posted on Career Site

September/October Job Information Sessions hosted at Community Colleges and Career

Centers (dates and time finalized at next consortium meeting)

December 1 Move into expanded Career Center

January/February Career Fairs conducted in our host and surrounding communities

Goals

Penn National Gaming is a diverse company with twenty-seven operations in eighteen states and Canada. Penn National actively pursues a straightforward workforce diversity philosophy: our workforce should reflect the community around us.

We have incorporated two specific goals for our hiring program at Plainridge Park Casino:

- 1. To hire 90% of our workforce from our host and designated surrounding communities; and
- 2. That 10% of our workforce be comprised of individuals from ethnic minority groups.

Approximately 52% of Penn National Gaming's workforce is represented by women. We will also provide additional consideration for members of the veterans community.

Should we, after exhausting all efforts to reach our 90% local hiring goal, fall short of that goal, we would expand our scope in concentric circles, within the Commonwealth of Massachusetts, from our facility location to incorporate neighboring towns and cities, including the Greater Boston area. Additional recruitment focus will be given to towns and cities within these concentric circles that have a higher than average unemployment rate, specifically Attleboro, Fall River and Brockton.

Job Offerings Overview

The following is an overview of our anticipated workforce needs. A more detailed workforce-hiring plan will be developed at a later date, once the regulations and property executive team are in place.

Plainridge Park Casino's hiring will focus on the departments below. All departments will have leads/supervisors and managers. The anticipated percentage of total new hires for the facility is reflected in the following table.* Our staffing plan will continue to evolve as our Executive Team comes on board.

Executive/Admin:	<1%
Finance/Cage:	13.6%
Gaming:	11.5%
HR and Wardrobe	2.6%
Marketing	3.2%
IT	1.7%
Surveillance	4.9%
Food &Beverage	40.7%
Security	10.2%
Facilities/Housekeeping	0.5%
Valet	3.2%

^{*} This does not include PPC's existing racing employees.

Our staffing/hiring model consists of a gradual ramp time schedule with some of the initial hires starting in November/December growing through May in anticipation of a June 2015 opening date. Below is a snapshot of the current staffing program and the percentage of workforce we anticipate starting employment by month.

Month - Start Date	% of total workforce to be hired (planned)
November/December 2014	1%
January	4%
February	6%
March	13%
April	25%
May	51%

The majority of our positions will be posted on our website in and around the Labor Day weekend. This coincides with the opening of our property's career center and will be followed up with a series of job information sessions that will be held in late September/early October at our local Career Centers and Community Colleges.

In the meantime, below is a list of job positions that will be among the first filled at the property.

General Administration

Executive Administrative Assistant Compliance Manager Compliance Administrator

VP of Finance

Manager of Planning and Analysis Financial Analyst **Manager Accounting** Staff Accountant Payroll/AP Manager Payroll/AP Clerk/Coordinator **Purchasing Manager Purchasing Clerk Purchasing Buyer** Supervisor Warehouse/Receiving Warehouse/Receiving Attendant **Internal Audit Manager Internal Auditor** Manager Player Services Player Services Shift Supervisor Player Services Cashier Revenue Audit Supervisor/Manager Revenue Auditor **Supervisor Count Room** Count Team Lead Count Room Associate Player Services Main Banker Administrative Assistant

VP of Gaming Operations

Manager Gaming Operations Slot Shift Supervisor Slot Attendants Slot Tech Manager Slot (VLT) Tech Supervisor Slot Technician Slot Performance Analyst

VP of Human Resources

Human Resources Business Partner HR Generalist Human Resources Coordinator Wardrobe Supervisor Seamstress Wardrobe Attendant

Training and Advancement Opportunities

Penn National Gaming has implemented a successful recruitment and training program throughout the country. For many of our employees, the opportunity they begin with is not just a job but also the start of a very successful career. We believe that our training and advancement programs will be the very catalyst to bolster the Commonwealth's goal to have our industry positively impact the unemployed and underemployed members of our communities.

Education Begins at Career Centers/Community Colleges

As described above, Penn National Gaming officials have already begun their discussions with local career centers in an effort to understand the needs of the un/under-employed community as well as to educate these agencies about the types of jobs we will have available. In order to have a longer-term impact, we don't see each job as just a "job" but as the opportunity for long-term careers in our company and the industry as a whole. Our workshops with local career center staff will include an effort to educate them about the long-term paths available for various skillsets and career goals for individuals seeking employment with our company.

Through the Consortium, we have started to forge a great relationship with both Massasoit and Bristol Community College and will look to partner with them regarding training opportunities for employees. These training opportunities include, but are not limited to programs in culinary, surveillance and slot tech repair.

The CATCH institute at Bristol will not only be a great recruiting source for our culinary talent, but can also serve at a training ground for those who want to advance their careers.

We anticipate this to an ongoing relationship that grows and develops with our workforce.

Red Carpet Service Training

Penn National Gaming is known for its top-notch hospitality and the high quality service of its employees. Each employee undergoes our Red Carpet Service training, starting from the first day and onward throughout his or her employment.

It Doesn't Stop There

It is our goal to develop our team members to take on positions of greater responsibility and promote internally whenever possible. As part of our engagement and performance management strategy, our managers are encouraged to have continued conversations with their team members to discuss training needs as well as potential career pathing opportunities. We help individuals achieve *the next level* through our various supervisory and management training programs. It is our goal to develop bench strength from within

the existing team member population. All open positions are posted internally first, to identify any internal talent prior to looking externally to fill open positions.

Promoting Education

In addition to our internal training programs, we will also provide a tuition assistance program for interested and eligible employees. This program offsets the costs associated with our team members who seek to pursue two-year, four-year or even graduate degrees. We also will explore, based on workforce needs and demand, the option of bringing classes onsite to Plainridge in partnership with Bristol and Massasoit.

COMMITMENT

Plainridge Park Casino and Penn are committed to developing a high performance, inclusive work environment that reflects the diversity of our community. We will strive to create a company culture where all ideas and all contributions are valued no matter how or from whom they may originate. We will actively seek out team members from traditionally disadvantaged groups to build an entertainment facility our community and the Commonwealth will be proud of. Our commitment to making inclusiveness the foundation for our culture is driven not only from our desire to enhance our community, but also because such commitment supports a sound business strategy.