

Nemacolin Woodlands, Inc.
DIVERSITY PLAN

09/05/05

Wanda L. Anker, CHE
Director of Associate & Diversity
Operations

Margaret H Magerko, CEO

**2005/06 DIVERSITY PLAN FOR
NEMACOLIN WOODLANDS INC.**

Name of Corporation: Nemacolin Woodlands, Inc.

Location of Corporate Headquarters: 1001 Lafayette Drive, Farmington ,Pa. 15437

Chief Executive Officer: Margaret H. Magerko

Telephone: 724-329-8555

Corporate Dun & Bradstreet Identification Number: 18-190-5662

Company Tax Identification Numbers:25-1891356

Inclusive Dates of the Diversity Plan:09/30/05

Program completed by: Wanda L. Anker, CHE

Telephone: 724-329-6166

PREFACE

Nemacolin Woodlands Resort is a full time, year round operation offering its guests a luxury experience both in lodging opportunities, as well as a myriad of other amenity offerings. The Resort exists to offer life experiences for its guests and associates.

Nemacolin maintains corporate headquarters in Farmington, Pa..

The Nemacolin Diversity Plan applies to the corporate headquarters office and all of the company's field offices.

Employment level is approximately 1300 including seasonal positions consisting of the positions listed on the organizational charts included in this plan. All positions are recruited both locally and, where appropriate, nationwide.

Nemacolin is an Equal Opportunity Employer and actively engages in seeking qualified minority, female, disabled and veteran candidates in its recruiting and employment practices. It has been recognized and awarded on the local and state level for these hiring practices. Nemacolin also encourages promotions of these employees from within its existing employee population and encourages them to apply for positions that they are qualified to fill. It Nemacolin's goal to provide equal opportunity to capable and qualified persons, without regard to race, color, religion, sex, national origin, age, sexual orientation, marital status, disability or veterans status.

DIVERSITY Plan

For year ending

2005

All data as of

10/1/2005

Approved by:

Trey Matheu, Director of Operations

RESPONSIBILITY FOR IMPLEMENTATION OF DIVERSITY PLAN

A. Corporate Responsibility

1. The responsibility under the Pennsylvania Gaming Act for a corporate manager to be appointed for Diversity activities is assumed by Wanda Anker. She is responsible for supervising the Human Resources Managers and staff who work with the divisional and departmental Directors, Managers and Supervisors to coordinate Diversity Programs.
2. Wanda Anker is designated as the Director of Associate & Diversity Operations. She is directly responsible for the Recruiting Department and the Associate Services Department. Their responsibilities include but are not limited to:
 - a) Coordinating and developing of Diversity Plan and the establishment of standard goals and criteria to meet the requirements of the Pennsylvania Gaming Act and its regulations.
 - b) Advising and directing Managers and Supervisors on all obligations with respect to this Diversity Plan, including the obligation to prevent harassment of employees placed through diversity efforts.
 - c) Serving as the chief liaison between Nemaquin and government compliance officers, as well as between Nemaquin and organizations formed to support females and minorities.
 - d) Recommending new or improved practices which advance the objectives of the Diversity Plan.
 - e) Auditing of Diversity Programs to assure conformity with corporate policy.
 - f) Reviewing and updating the Diversity Plan on an annual basis.

B. Divisional/ Departmental Responsibility

1. Although the corporate policy officer has the responsibility for compliance with the Pennsylvania Gaming Act, achievement of diversity also requires the delegation of additional responsibilities:
 - a) The Associate Service and Recruiting Managers at Nemaquin along with divisional and departmental Directors, Managers and Supervisors are responsible for implementing EEO/Diversity policy at the division and departmental levels and their duties include the following:
 1. Effective realization of both the spirit and detailed provision of the corporate policy and diversity mission statement;

2. Advising each manager and supervisor of this policy and directing them to use it effectively in their employee relationships;
3. Dealing firmly and promptly with any efforts to impede or prevent compliance with this policy;
4. Maintaining objective data as well as auditing and reporting systems that will measure effectiveness, needs, attainment of objectives and other measures of compliance with federal requirements;
5. Staying advised of federal, state and local laws and regulations affecting Nemaquin's Diversity policy;
6. Keeping the Corporate EEO Officer informed of problems concerning the implementation of this policy, and
7. Including their departments in scheduled training programs on an annual basis or new hire training.

**REAFFIRMATION OF NEMACOLIN 'S
EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY**

Nemacolin is committed to providing equal opportunity in employment for all people without regard to race, color, religion, sex, national origin, age, sexual orientation, marital status, disability, or veterans status and to prohibiting discrimination in employment on the basis of race, color, religion, sex, national origin, age, sexual orientation, marital status, disability or veterans status. By hiring, compensation, training, promoting, and in all ways providing equal treatment to employees, the effectiveness of our organization can be maintained while enhancing the growth and progress of our employees. To further this commitment, the Company maintains, and senior management has reaffirmed, Nemacolin 's Diversity Policy & Diversity Mission Statement. This policy is attached to this Plan as Diversity Plan Statement Exhibit A (Diversity Policy) and Diversity Plan Statement Exhibit B (Diversity Mission Statement) and will be included in the Associate Handbook and is available to all employees in both electronic and hardcopy formats.

DEVELOPMENT AND EXECUTION OF ACTION ORIENTED PROGRAMS

A. Job Descriptions

Job descriptions are continually analyzed to ensure that they accurately reflect the functions performed by incumbent workers. Position descriptions are uniform throughout the organization and among job titles, ensuring that such specifications are consistent and free from bias.

B. Dissemination of Job Descriptions

1. All management and supervisory personnel and recruiting sources actively involved in the recruiting, selection, screening and promotion process are given access to applicable position descriptions located on the J drive of the shared network system.
2. New positions or job vacancies are posted on a company-wide basis, in areas accessible to all employees. These areas include posting by every time clock area, the staffateria bulletin board and on the website. The job posting includes the job title and a job summary for each of the open positions and is based upon the current position job description. Management positions, positions that are filled through redeployment or positions that are filled through progression by current employees may be filled without the use of job postings.

C. Evaluation of Selection Process

1. Selection processes have been reviewed and have no discriminatory effects upon minority groups and women.
2. Personnel involved in the recruiting, screening, and selection of new hires are carefully selected and trained to insure the elimination of bias.
3. All associates have been and will continue to be encouraged to refer applicants and to participate in the Associate Referral Incentive Program to receive a monetary incentive of \$100.00 for referring applicants who stay with the company 90 days.
4. Nemaocolin 's recruiting advertisements picture both female and minority members of the workforce.
5. Job Opportunities are posted in public media including trade journals, newspapers, the Company's corporate website and on career web sites such as College Central.com, Fine Dining Restaurants.com, Hcareers.com, AmericasJobBank.com, PACareerLink.com, HospitalityJobsOnLine.com, PSHRS (Penn State Hotel & Restaurant Society) and each newspaper ad will run on their website for 7-14 days after. Applicants may apply for open positions through a variety of methods including electronically, by mail and by facsimile.

D. Promotion

1. Nemaocolin supports the progression of current employees by recognizing and rewarding an employee's individual performance through promotional and/or developmental opportunities within their own geographic region.
2. Through a corporate wide management level succession planning, opportunities for the promotion of minority and female employees and the hiring of potential external candidates are identified. All candidates are evaluated based upon their skill, experience levels and behavior styles.
3. Job training and development programs are initiated as needed to assist the incumbent or future incumbent to grow in identified areas. Educational Classes and Certification Programs specific to this industry are also offered on site and create promotion opportunities. If the employees reading levels are not up to par to be successful, we are a partner with the local Adult Learning Center to offer programs to enhance reading levels or to complete a GED to move to the next level. (The last program like this included approx 20 employees to increase their reading, math and comprehension while still remaining on the clock and receiving pay by the company).
4. Job descriptions are validated on job performance related criteria.
5. Nemaocolin places job postings in common areas, i.e. staffateria area and all time clocks available to all employees, thereby providing a mechanism for the internal posting of available job positions without regard to race or gender.

E. Specific Programs

Many of Nemaocolin's action oriented programs are the result of the overall corporate philosophy supporting the company's EEO policy and Plan. These programs encompass selection, promotion, training, and also, work environment and community environment and are enumerated below. .

1. *Equitable Pay*. Nemaocolin compensates all employees on an equitable basis, with no discrimination due to race, sex, age, religion, national origin, disability, or veterans status. Within each group number, qualifications, job performance and years of service dictate differences in salary between individuals. We have initiated programs with the Goodwill Agency, Area on Aging & Community Action of which we have been recognized with local and state awards. These associates who fall in these special programs are on the same pay scale as able workers and same tenure benefits.
2. *Training*. Harassment training is presented to all new employees with New Hire Orientation and also to the existing employee population on an annual basis. Additionally, supervisors and managers regularly attend performance management workshops, one of the goals of which is to ensure the best possible working relationship

between managers and staff members and to ensure the most professional treatment of the performance evaluation process.

3. *Flexibility in the Workplace.* Nemacolin has a range of flexible policies, programs and benefits to assist employees in balancing work and family responsibilities, including:
 - a) Flextime;
 - b) A short-term & long-term disability program;
 - c) Paid vacation, holidays and other paid time off;
 - d) 401(k) Plan with company matching contribution;
 - e) Bonus & Commission Programs
 - f) Ten Year Trip (Awarded to FT associates after completing 10 years of service).
 - g) Opportunity to purchase other provided benefits such as life insurance, cancer insurance, vision, dental, and financial planning.
4. *Community Board Service.* Nemacolin encourages and promotes employees to serve on the boards of directors of local community organizations. Representative organizations include : Westmoreland/Fayette Workforce Investment Board, Laurel Business Institute Executive Board, Laurel Highlands Visitors Executive Board, Laurel Highlands Visitors Education Board, Fayette County Workforce Clusters Executive Board, Westmoreland/Fayette Youth Council Board,
5. *Community Service.* Nemacolin encourages employees to volunteer and participate in the community. Receiving the Community Award for the state of Pennsylvania from the American Hotel Lodging Association for 2004 tells it all that our associates and company philosophy is Community Service. It has been part of our Mission Statement since we opened in 1987. The annual 84 Lumber Classic Golf Tournament continues to be a community service event breaking annual records of charity contributions. 2004 donating 1.4 million dollars to local charities alone. Our associates are committed to the Annual Heart Association Heart Walk and continue to be the “Champions” of raising almost \$40,000.00 over the last three years. They continue to participate with the Habitat For Humanity in building the homes in our local community of Fayette County. Others donate their time as counselors with support groups of AA or answering the phones for Hope Network Hotline (teen pregnancy, etc.).
6. *Advertising.* All of Nemacolin's regional advertising focuses on the company's community citizenship and positive work environment.

INTERNAL AUDIT AND REPORTING SYSTEM

Primary responsibility for auditing Nemacolin's compliance with the Pennsylvania Gaming Act rests with the Associate Operations & Diversity Director which is under the responsibility

of Wanda Anker as the designated Corporate EEO/Diversity Officer, shares responsibility for overseeing all audit activities. To assist the Associate Operation Departments in its efforts to continually monitor the progress made in the Diversity area, the following procedures have been established:

1. All Associate Services Managers & Recruiting Managers serve as the Diversity Coordinators for their division, department and offices for which they have responsibility.
2. The Diversity Coordinators work closely together to assist in monitoring records of all personnel activity, including referrals, offers, placements, transfers, promotions and terminations, rehires, layoffs and trainees to ensure Nemaquin's non-discriminatory policy is carried out.
3. The Diversity Coordinators will periodically report to Wanda Anker as to the degree to which equal opportunity and organizational objectives are attained and will further advise senior management concerning effectiveness and recommendations for future action.

ORGANIZATIONAL CHARTS

Organizational Charts by business unit have been provided as Diversity Plan Statement Exhibit C. These organizational charts illustrate the Company's staffing pattern within all business units. The charts that follow show all employees by business unit, job title, including departmental or unit supervision and manager.

JOB GROUP ANALYSIS

Job Groups have been developed based upon the criteria of combining titles with similar content, similar advancement opportunities and similar compensation. Job groups have not been developed to obscure underutilization and problem areas.

Nemacolin will regularly conduct a job group analysis to review the placement of minorities and women that the Company employs in each job group by percentage rate in order to monitor its progress towards reaching its Diversity Goals and compliance with this Diversity Plan. A current job group listing has been made available and attached as Diversity Plan Statement Exhibit D.

DIVERSITY PROGRAM FUTURE GOALS

The Company has performed an in-depth analysis of its total employment process to ensure that no impediments to equal employment opportunity exist. This analysis included evaluation of the workforce by organizational unit and job group; evaluation of personnel activity; evaluation of the Company's compensation systems; and evaluation of our selection, recruitment, referral and other personnel procedures. The Company has or is in the process of developing and implementing action-oriented programs designed to assist the company in meeting its diversity goals in the future.

A. Composition of the Workforce

1. The Company has reviewed the diversity information for the resort and has found that it is currently 36% diverse with larger numbers of diversity contributions to the female population. Due to the low percentages of diverse populations living in this area, placement goals to increase the employment of minorities and women have been outlined and new programs will be designed to introduce an increase to these hires in 2006.

B. Specific Action-Oriented Plans

1. In order to achieve its diversity goals, Nemaocolin intends to do the following:
2. Attend diversity conferences to recruit more women and minorities;
 - a.) Advertise in publications focused on diverse groups using the internet and print to attract minorities and women;
 - b.) For local hires, attend career fairs to attract local candidates. Advertise the events in radio and print media as appropriate within a commuting distance (50 miles) of job location;
 - c.) Partner with local agencies and boards of diversity to introduce programs to company. (East End Community, Public Assistance Office, African American Chamber of Commerce, etc.).
 - d.) Utilize recruiting firms which have an expertise or a focus on a minority or female audience.
3. Nemaocolin will continue to focus on hiring diverse candidates through our recruiting processes as outlined in this Diversity Plan.
4. The overall attitude toward equal employment opportunity and affirmative action in Nemaocolin is a positive one. Nemaocolin Woodlands Resort's Diversity Mission Statement supports & is committed to diversity/equal opportunity efforts.

C. Selection Process

1. The total selection process has been reviewed to ensure that the selection process does not screen out minorities/ females in a discriminatory manner.
2. All pre-employment forms, such as the Nemaocolin application form have been reviewed for compliance with all federal and state laws.
3. Nemaocolin has reviewed principal referral sources for all areas include professional agencies, referrals from employees or other local employers. Depending on the type of position applied for, several individuals are normally involved in the interview process. The interview process includes initial screening by the Recruiting Department staff member; in-depth interviews with hiring manager, Director of Recruiting, and any other division/department manager with whom the individual might have significant interaction or reporting responsibilities.
4. Selection of the applicant is coordinated by the Recruiting Department staff and the hiring manager. Positions may be filled by application, an internal job posting system, an external search, or a combination of all methods. The interview and selection is made by the hiring manager based on those qualifications deemed to match those required by the position to be filled.
5. All job descriptions and titles are reviewed to ensure that they accurately reflect the functions and the duties of the position described and to determine whether all specifications required are included in the descriptions.

D. Promotion and Transfer Analysis

Nemaocolin monitors promotions and transfers to ensure that minorities and females are well represented in the movement of employees.

E. Training and Educational Assistance

1. Nemaocolin encourages its employees to seek training to help meet job requirements, often making training a part of an employee's individual development plan.
2. Nemaocolin dedicates an extensive in-house Training Department that offers a wide variety of programs geared toward motivating, assisting employee growth and performance, certifications, hospitality & other specialized training.
3. Educational tuition reimbursement is available for all full-time Nemaocolin employees who meet eligibility requirements that include acceptable performance, length of service and supervisory approval. A maximum reimbursement is established on an annual basis for job-related course/exams offered by an accredited college, university or approved insurance program facility. In general, the courses covered are considered to add to an employee's effectiveness and potential.

F. Layoff Activity

In the event of a layoff, Nemaocolin bases its decisions on education, skill set or company business levels and does not base any decisions on race, gender or any other protected category.

G. Company-Sponsored Recreation and Social Events

1. Facilities at Nemaocolin are desegregated by race and by sex (except where privacy interests are paramount, such as in restrooms, locker rooms).
2. Nemaocolin encourages all employees to participate in Company-sponsored recreation and social events. Minority and female employees are well represented in these activities.

H. Workforce Attitude

The overall attitude toward equal employment opportunity and Diversity in Nemaocolin is a positive one. Nemaocolin anticipates no problems in any of its departments that would require special corrective action. Any isolated instance of a negative attitude that would come to the attention of Nemaocolin management would be dealt with in a forthright manner.

I. Compensation

All job categories have been reviewed and there do not appear to be any gender, race or ethnicity-based disparities.

J. Compliance with Diversity Goals

In order to ensure compliance with its Diversity goals, Nemaocolin has ensured the following:

- a) Application and related pre-employment forms are in compliance with federal and state regulations.
- b) Job descriptions accurately reflect actual functions and duties.
- c) Minorities and women are not excluded from participating in Company-sponsored activities or programs.
- d) De facto segregation does not exist in any of the Nemaocolin locations.
- e) Seniority provisions do not contribute to overt or inadvertent discrimination.

- f) Nemaacolin employees, managers and supervisors are in support of Nemaacolin 's Diversity policy.
- g) Minorities and women are not underrepresented in training or career improvement programs.
- h) Affordable housing is available for all employees.
- i) Public transportation is available to the workplace for local employees.
- j) Equal Employment Opportunity posters are prominently displayed in Nemaacolin's facility.
- k) All new purchase orders will contain the applicable EEO compliance clause.

Nemacolin Woodlands Resort

Diversity Policy

It is the policy of Nemacolin Woodlands Resort to continue with our open environment to value differences and enable associates to contribute, develop, promote and recognize their various levels of potentials to reach their personal goals while obtaining our company goals .

Our Nemacolin Policy is to apply diversity principles in relationships with our guests, suppliers and communities. Our Nemacolin policies are:

- Each associate will be respectful to each other in words & actions.
- Our company policies, procedures and systems will support and encourage diversity principles.
- Our company will create and support an environment in which each associate will have the opportunity to advance their abilities and level of expertise.
- Each associate will act with respect and participate in our diversity policy of Nemacolin Woodlands Resort including our suppliers and our communities.

Nemacolin Woodlands Resort Diversity Mission Statement

Nemacolin Woodlands Resort is committed to ...

- Attract and maintain the most talented and qualified workforce looking to our diverse industry and seeking out the best resources available.
- To seek out qualified vendors in minority communities and empower associates from all backgrounds with an equal opportunity to train, advancement and realization of their full potential.

Nemacolin Woodlands Resort is proud to...

- Award contracts, selecting vendors, reward and promoting associates on the basis of their qualifications, achievements and contributions.
- We believe that a diverse team provides a variety of ideas and points of view for solving problems and most importantly represents who they are and value their ideas.

Nemacolin Woodlands Resort will continue to...

- Be a role model in the Hospitality & Gaming industries in promoting diversity within all the various opportunities available.
- Maintain our commitment to provide a rewarding and exceptional environment for our associates, suppliers and vendors. One that is respectful and inclusive of all individuals regardless of their race, color, religion, gender, national origin, age, sexual orientation or disability.