



Sports Wagering Application Review Commission
c/o Maryland Lottery and Gaming Control Commission
1800 Washington Boulevard, Suite 330
Baltimore, Maryland 21230

December 8, 2022

Chairman Brandt,

Enclosed is Greenmount OTB's Diversity Plan submitted to SWARC as an Addendum to our Mobile Sports Wagering License Application. The enclosed plan was prepared with the support of our mobile and retail wagering operating partner, Parx Interactive Maryland. Greenmount OTB will make a good faith effort to meet the diversity objectives outlined our Plan and to periodically report metrics to the Commission.

Greenmount OTB's diversity plan includes: strategies for obtaining a diverse group of owners, investors, employees, and contractors; diversity objectives and methods for tracking; a plan for diversity related outreach or events to support our objectives; proposed timelines and benchmarks; the diversity status of our owners; and other efforts to demonstrate our commitment to ownership, investment, management, employment, and contracting diversity. Please feel free to reach out to Nick Orrison via e-mail with any questions about the enclosed Diversity Plan. Nick can be reached at norrison@betparx.com.

Very kind regards,

A handwritten signature in blue ink, appearing to read "CRICHARDS".

Chris Richards

A handwritten signature in blue ink, appearing to read "DRICHARDSON".

David Richardson



**Greenmount OTB, LLC and
Parx Interactive Maryland Inc.
Diversity and Inclusion Plan**

December 2022

**Submitted by:
Ronald W. Davis M.Ed.
Chief Diversity Officer and Director of Community Development**

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EXECUTIVE SUMMARY

Greenmount OTB and Parx's mission is to maintain an open and welcoming atmosphere where employees, guests, business partners and the community at large feel comfortable and respected. The Diversity and Inclusion Plan's focus is to connect our business to real opportunities through outreach and partnership.

- We value diversity in the workplace. The best ideas and efforts come not from one individual, but when drawn from many different perspectives and viewpoints. We strive to capitalize on the varied experiences, ideas and knowledge that each employee brings to the business. We reach out to recruit directly from universities and colleges in the region and attend job fairs to find the best talent. We also contact state and local job placement organizations and services. We will target advertising for job vacancies in media representing historically under-represented groups. We function as a team. We are the Best of the Best.
- We value diversity in our business partnerships. Our goal is to ensure that there is an equal opportunity for all vendor and contractor partners to participate in our business, and share in our success. We have joined the Minority Supplier Development Council. MSDC is an organization that assists MBE and WBE owned businesses in the vendor certification process. Our outreach extends to:
 1. The African American Chamber of Commerce
 2. The Asian American Chamber of Commerce
 3. The Hispanic Chamber of Commerce
 4. The Women's Business Enterprise Council
 5. Carroll County Chamber of Commerce
- We meet virtually with organizations that provide vendor and contractor outreach opportunities. Since January 2008, the sister company of Parx Interactive Maryland, Inc.'s (Parx Maryland), Greenwood Gaming and Entertainment, Inc. (GGE), has:
 - Conducted 1,500 vendor meetings with MBE and WBE that has led to business for many of these companies and great partnerships for GGE and
 - Awarded significant business to MBE, WBE and LBE construction contractors

- Under the same leadership team, Parx Maryland intends to continue its commitment to MBE and WBE opportunities for its retail and online sports books, together with Greenmount OTB, LLC (Greenmount).
- Parx Maryland and Greenmount recognize and value the diversity of our customers. We understand that customers can choose from among many entertainment destinations in Maryland, and that they choose our sportsbook. We pledge that the quality of service and attention they receive while visiting us will serve as proof of our appreciation for their patronage.
- We welcome the opportunity to be an active member of the community. The success and well-being of our business directly affects the success and well-being of our community. GGE has supported many regional charitable organizations in various areas, which Parx Maryland intends to continue to support, including:
 1. Community
 2. Health
 3. Education
 4. Senior Organizations
- Our leadership team is proud to work in partnership with civic and charitable organizations, and GGE is a generous contributor to various local, national and international organizations. Parx Maryland intends to continue this tradition.

Parx Maryland and Greenmount are advocates for a strong and vital business community. We believe that strong partnerships work!

DIVERSITY DEFINITIONS

Diversity refers to the variety of backgrounds and characteristics found in society today; thus, it embraces all aspects of human similarities and differences. Diversity refers specifically to historically under-represented groups and differences with respect to age, culture, race, ethnicity, religion, color, disability, national origin, ancestry, sexual orientation and veteran's status. Business definitions of diversity are as follows:

DIS Disabled Business Enterprise

DIS is business that is at least 51% owned and controlled by a disabled individual.

DVET Disabled Veterans Business Enterprise

DVET are businesses that are at least 51% owned and controlled by one or more disabled veterans.

MBE Minority Owned Business Enterprise

MBE businesses are at least 51% owned and controlled by individuals belonging to certain ethnic minority groups. Ethnic minorities are United States citizens who are Asian, African American, Hispanic or Native American.

M/WBE Minority Women Owned Business Enterprise

M/WBE businesses are at least 51% owned and controlled by citizens belonging to certain minority groups and a person of female gender.

VET Veteran Owned Business Enterprise

VET businesses are at least 51% owned by individuals who are veterans of the U.S. Armed Forces.

WBE Women Owned Business Enterprise

WBE businesses are at least 51% owned and controlled by a person who is female in gender.

STATEMENT OF GOALS

- 1. To establish a diverse workforce by ensuring consistency, fairness and inclusion in the recruitment, selection and the career development process.**
- 2. To promote diversity by ensuring equal opportunity in the procurement of contractors, sub-contractors, assignees, lessees, agents, vendors and suppliers.**
- 3. To create an open and welcome atmosphere at our retail and online sportsbooks, where employees, guests and vendors feel comfortable and welcome.**
- 4. To actively seek out minority, disadvantaged and other historically under-represented businesses to provide opportunities for them to bid on providing services and/or supplies.**
- 5. To be a strong financial supporter of a diverse number of worthwhile community charities and non-profit organizations through our community giving program.**

DIVERSITY IN THE WORKPLACE

The four primary areas of diversity effectiveness are awareness, fairness, inclusion and leverage. Parx Maryland seeks to provide leadership in all of these areas of diversity and to encourage and support senior executives as they promote these goals in their areas of responsibility.

Our new strategy uses employee resource groups to form business resource groups to help us connect with employees, customers and the community. We encourage them to examine racial, ethnic, cultural, gender and age issues in both the local community and the workforce; to understand the importance and appreciation for people; examine stereotypes and prejudices and how they affect behavior and how to interact more effectively with people from all lifestyles. We will also include examination of special needs, veterans and all historically under-represented groups.

The Human Resources and Legal departments will provide appropriate support and assistance, but Parx Maryland looks to all of its senior executives to incorporate diversity into their areas of responsibility within our workforce. Absolute impartiality is required when recruiting, selecting and orienting new hires. The same care is expected when considering candidates for pay reviews, further training and promotions.

Recruitment

Greenmount OTB and Parx Maryland, through its affiliated employer companies, are Equal Opportunity Employers.

Our policy supports our company commitment to recruit, retain and develop a workforce that reflects both its local community and customer base. This policy contributes to a well-rounded workplace where differences are respected and appreciated. Our goal is to have the most appropriate and culturally diverse workgroup to foster creativity and develop our Team Members to reach their potential.

In addition to Parx Maryland's traditional ways of seeking new candidates, we will undertake the following outreach strategies:

1. Working with local Chamber of Commerce as well as Working with the African American Chamber of Commerce, the Hispanic Chamber of Greater Philadelphia, and the Asian American Chamber to create awareness of employment opportunities in order to support the Maryland operation.
2. Developing close relationships with federal, state and local agencies and minority hiring programs to increase opportunities for minority applicants.
3. Regular monitoring by Human Resources to ensure that our diversity targets and benchmarks reflect our community. This includes tracking applicant flow by inserting a survey in the application process asking applicants to voluntarily indicate race/ethnic origin.
4. Attending job fairs in Southeastern Pennsylvania, with an emphasis on those that target minorities and women.

Selection and Orientation

All Parx Maryland employees who are responsible for recruitment and selection will be educated in lawful employment decisions. We will encourage all individuals to apply for positions with us and select the most appropriate and best fit for employment within our organization. We have hired a diversity assistant who will conduct diversity and inclusion orientation workshops. Our materials will be distributed in communities that will create a diverse group of applicants to choose from and to offer opportunity in areas where there may be a greater number of candidates seeking employment.

We will ensure that all employment literature is clear and understandable including:

1. Website information available online at parxcasino.com
2. Any collateral including written tests that may be used.
3. Post hire paperwork
 - Team Member Handbooks
 - 401 K and other Employee Benefit Information
 - Medical Health and Benefits Information
 - Payrate acknowledgment form
4. Newsletters and company- wide communications

Training

Parx Maryland will conduct ongoing training for department heads and senior staff on the different training methods to reach diverse learning styles. We will ensure that training curriculum materials account for a diverse workforce that is inclusive and engaged. Multi-cultural appreciation is paramount to connecting with a diverse workforce. We will continue to encourage our Team Members to embrace diversity; this begins with our formal orientation program and training when a new Team Member is hired.

Parx Maryland also encourages our Team Members, regardless of background, to pursue their goals through higher education by providing tuition assistance and by collaborating with local colleges. Our Training program is developing into a strong area where we can encourage personal and professional growth.

Employee Relations

When possible, Parx Maryland will recognize and promote special dates, events and holidays such as:

- African American History Month
- Women's History Month
- Asian American Heritage Month
- Gay and Lesbian Pride Month
- Hispanic Heritage Month
- American Indian Heritage Month
- Veterans Day

It is of vital importance to our organization and the community that we foster positive relationships between our Team Members and encourage them to share their experiences with us so we may grow. Creativity and experience are important to us and we ask that our Team Members share their diverse backgrounds so that we may assist them in better understanding one another, which also helps with our guests. We encourage our team members to use their vast knowledge and share their ideas to strengthen our sense of community within our organization.

We will also publicize such events in the company newsletter onsite message boards and the company's web pages.

1. Coordinate the special celebrations with the Food & Beverage department so appropriate celebratory meals will be available.
2. Host diversity focused events where employees can bring food from their cultures to share with others.
3. Designate an area where employees can display artifacts or information about their cultures.
4. Diversity quizzes with prizes and company newsletter.

Career Development

Our efforts in career development will include:

- Regularly perform a survey of all pay increases/promotions to measure the success of the diversity initiative.
- Track and review the pay increases/promotions within each department.
- Hold managers accountable, support and encourage them while they implement our diversity plan in their respective departments.
- Create development plans where appropriate and encourage a diverse pool of applicants to be presented for promotional opportunities.

DIVERSITY AND OUR GUESTS

Our goal is to market and advertise our company to create an inviting atmosphere at our sportsbooks where individuals of many diverse backgrounds feel comfortable.

1. Use our relationships in multicultural organizations to support these organizations and promote diversity.
2. Food and Beverage initiatives.
3. Celebration of holidays and special events.

DIVERSITY IN COMMUNITY GIVING

Parx Maryland is proud of its sister company's outstanding record in support of charitable organizations as well as effective outreach activities that create positive community impact and intends to continue this with its Maryland sportsbooks through the following:

1. Encourage strong and positive citizenship in the community.
2. Employees should be encouraged to participate in local community organizations.
3. Sponsor "How to apply for a job" workshops at local community colleges in the area.
4. Collaborate with community organizations to serve as mentors to any programs that support our diversity initiatives.
5. Provide scholarships for local students attending colleges and universities.
6. Outreach to community food banks with excess food from company inventory.
7. Highlight charitable payroll deductions to reflect our diverse employee population.

Parx Maryland also strives to bring financial support to worthwhile non-profit organizations in our community that is effective in the areas of healthcare, seniors and education. Since commencement of gaming operations in 2006, GGE has made significant philanthropic contributions to many notable beneficiaries. Parx Maryland is committed to continuing its tradition of community giving and intends to seek opportunities with similar partners for its online and sports wagering operations.

DIVERSITY IN OWNERSHIP AND BUSINESS PARTNERSHIPS

Parx and Greenmount are privately owned companies, each of which are ultimately owned by individuals who are not diverse. This is not likely to change in the near future. However, Parx and Greenmount are committed to pursuing diversity in their business partnerships. Furthermore, in signed Memorandums of Understanding (dated December 21, 2021 and November 16, 2022) between Greenmount and the Sports Wagering Application Review Commission, Greenmount affirms that it will:

- make serious, good-faith efforts to interview minority and women investors in any future attempts to raise venture capital or attract new investors; and
- within a reasonable time after each future attempt to raise venture capital or attract new investors, submit to the Department of Legislative Services a statement that (i) lists the names and addresses of all minority and women investors interviewed; and (ii) of the minority and women investors who were interviewed, identifies those who acquired an equity interest in the Company.

It is our intention to create an environment where there is equality of opportunity in all of our business partnerships. We will work with a diverse group of contractors, suppliers and other vendors, certified minority owned, women owned, disabled and small business enterprises to provide our company with goods and services. A database will be developed to match historically under-represented suppliers to buying opportunities within our company.

We will encourage all of our partners to support diversity efforts through second tier supplier programs.

In turn, the company will mentor disadvantaged businesses to help them develop.

Our executives are committed to attending trade shows and trade fairs virtually as a way

of meeting new potential partners and a web site was created allowing potential vendors to be included in the vendor database and receive information about procurement of goods and services.

Key diversity activities include:

- Review and improve our supplier diversity website for MBE, WBE and DIS online registration
- Active participation in diversity focused trade shows, conferences and conventions such as the Minority Supplier Development Council, NAACP, Hispanic Chamber of Commerce, African American Chamber of Commerce, and Asian American Chamber of Commerce

- Regular vendor meetings with our buyers to discuss enriching business partnerships through inclusion
- Taking advantage of opportunities to mentor MBE, WBE businesses to include them in our supplier pipeline
- Discussion of inclusion barriers to provide solutions
- Create and implement the star program to include new MBE and WBE vendors

DIVERSITY EQUITY AND INCLUSION COMMITTEE

To ensure that our goals are reached we will establish a Diversity Equity and Inclusion Committee, which is chaired by a senior executive and includes representation from a broad spectrum of our organization. The Diversity Director is a key member of the committee.

The goal of the committee is to address three main diversity targets:

1. The Workplace – Recruitment, selection, training, pay, benefits, upward Mobility and work environment.
2. Guest Relations – Marketing, advertising and promotions.
3. Business Partnerships – Local community, minority, women, disabled and Veteran owned business.

The Diversity and Inclusion Committee will seek to create a positive atmosphere of awareness, fairness, inclusion and leverage.

DIVERSITY AND COMMUNITY DEVELOPMENT DIRECTOR

The Director of Diversity and Community Development (Director) reports to the Chief Executive Officer and is responsible for the implementation, monitoring and enforcement of the Diversity and Inclusion Plan. The responsibilities for the Director include: recruitment, equal opportunity awareness training, workforce statistical analysis, grievance counseling and fact finding, career advancement counseling, assessment and adaptation of all personnel and compensation policies and procedures for conformity with agreed policies approved by any federal or state equal employment and business opportunity laws, monitoring and coordinating contracting and purchasing and construction activities and developing and maintaining involvement of the company in the community in support of equal employment and business opportunity.

The Director will continually communicate with iGaming and Sports Wagering, Human Resources, Purchasing, Facilities and Construction departments of Parx Maryland and its affiliates, and with Greenmount to ensure that the objectives of the policy are being met. These departments will be required to submit reports of contracts awarded and contractor advertising for all levels of the workforce to demonstrate efforts made to comply. In addition, the Director works closely with the Vice President of Human Resources to review employment practices to determine that all policies and procedures apply equally to all employees and all policies comply with our diversity initiatives.

The Director works with local stakeholders to keep them informed of the company's efforts in these areas and their impact on the community. The Director also serves as a member of the Responsible Gaming Committee focusing on responsible gaming, including the prevention of underage and problem gambling.

The Director will work closely with the American Gaming Association task force. The AGA is committed to promoting diversity in the commercial casino industry and accomplishes this commitment through a number of initiatives that focus on hiring and procurement. The goal is to maximize participation on the human resource, purchasing and contracting subcommittees of AGA. The Director will coordinate Parx Maryland's participation in expos and fairs designed

to give small suppliers and vendors the chance to showcase their products directly with purchasing decision makers. The Director will direct the company's philanthropic donations, including local, regional and national.

PLAN MEASUREMENT AND EVALUATION

Evaluation is continuous with annual reports to the Maryland State Lottery & Gaming Control Agency (MLGCA) on the key areas of plan performance.

Internally, the Diversity, Equity, and Inclusion Committee will provide ongoing assistance with evaluation and measurement. Other activities of the committee include:

- Providing the CEO and the senior executive committee with periodic audit reports of their findings, including identifying accomplishments as well as any areas for improvement
- Providing the MLGCA with a report of our diversity results on an annual basis
- Recommending diversity and Inclusion programs and community projects
- Advising the company's management team with respect to the foregoing
- Documenting the committee's activities and progress and updating the senior executives on that progress

