



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

VIA ELECTRONIC MAIL ONLY

March 15, 2023

Chairman Brandt,

Enclosed is the Diversity Plan for Canton Gaming, LLC (d/b/a “Finest Flag Gaming”) submitted to SWARC as an Addendum to our Retail Sports Wagering License Applications for our locations in Towson and Canton. The enclosed plan was prepared with the support of our retail sports wagering operating partner, betParx, and our food and beverage partner, The Greene Turtle Franchising Corporation (“TGTFC”). Finest Flag Gaming will make a good faith effort to meet the diversity objectives outlined in our Plan and to periodically report diversity metrics to the Commission.

Finest Flag Gaming’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 Nancy Aviles via e-mail with any questions about the enclosed Diversity Plan. Nancy can be reached at naviles@itaghholdings.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Sapperstein", is written over a light blue circular stamp.

Mark Sapperstein
Finest Flag Gaming

Introduction:

Finest Flag Gaming (“FFG”) is a privately held Maryland limited liability company formed on September 6, 2022 and has not yet commenced retail sports wagering operations at our Towson and Canton locations. FFG is a new entity owned by four individuals, including three women owners who also satisfied the personal net worth criteria provided in SWARC’s regulations. FFG’s owners and managers are committed to promoting diversity and inclusion in all aspects of our operations. FFG partnered with The Greene Turtle Franchising Corporation that will run and manage the retail food and beverage operations inside our Canton and Towson sportsbooks. Finest Flag Gaming will be responsible for the oversight and operation of retail sports betting, while working closely with our Sports Wagering Operating Partner, betParx. Finest Flag Gaming, The Greene Turtle, and betParx are committed to increasing diversity in our respective workforces in accordance with this Diversity Plan.

This Plan will be applicable to any potential investors, employees, and contractors of FFG in connection with our retail sports wagering operations. FFG will make a good faith effort to meet the objectives outlined in this Diversity Plan and to periodically report diversity metrics to the Commission. FFG will encourage and require our operating partners to review this plan and promise to use their best efforts to effectuate it or their own diversity plan – so long as their plan, at minimum, adheres to the benchmarks included herein.

FFG has a policy to hire and promote individuals who best meet the requirements of available positions and those with the best potential for advancement. At the same time, it is our policy to provide Equal Employment Opportunity in full compliance with the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, The Vietnam Era Veterans Readjustment Assistance Act of 1974, the Addendum to SWARC Application and any other Federal, State, or local laws that prohibit work-place discrimination.

I. Strategies for obtaining a diverse group of owners, investors, employees, and contractors:

Finest Flag Gaming is committed to pursuing diversity in its ownership and its business partnerships. On February 24, 2023 Finest Flag Gaming and SWARC signed a Memorandum of Understanding, whereby FFG affirms that it will: (1) make serious, good-faith efforts to interview minority and women investors in any future attempts to raise venture capital or attract new investors; and (2) 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 FFG. It is our intention to create an environment where there is equality of opportunity in all of FFG’s business partnerships. FFG will make a good faith effort to partner 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.

II. Finest Flag Gaming's diversity objectives and methods for tracking those objectives:

Once operational, Finest Flag Gaming will establish a diverse workforce by ensuring consistency, fairness, and inclusion in our recruitment, selection, and career development processes. FFG will establish environments of respect and understanding in our workplaces and a culture that values and reflects the diversity of the communities in which we operate. We will promote diversity by ensuring equal opportunity in the procurement of our contractors, subcontractors, vendors, and suppliers. FFG will strive to create open and welcome atmospheres at our retail sportsbooks, where employees, guests, and vendors always feel comfortable and welcome. FFG will make a good faith effort 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 to our retail sportsbooks.

FFG will further strive to be a strong financial supporter of a diverse number of worthwhile community charities and non-profit organizations through our community giving efforts. FFG will comply with all applicable laws and regulatory requirements in the State, including, but not limited to, any pertaining discrimination based on race, color, religion, ancestry, national origin, sex, gender identity, sexual orientation, age, veteran status, handicap, or disability. Shelley Collins, Vice President of Human Resources (female), is responsible for TGTFC's current and continued efforts to enhance TGTFC's diversity policy and will assist FFG with these ongoing efforts as well.

III. Finest Flag Gaming's plan for diversity-related outreach or events to support its diversity objectives in ownership, investment, management, employment, and contracting:

FFG will actively search for a diverse pool of candidates to find the talent, skills, and experience to meet the needs of these new ventures. FFG plans to advertise job openings on employment websites, social media outlets, Chambers of Commerce, and with offices of unemployment. It is illegal and against FFG's handbook policy for any owner, investor, or employee to create an intimidating, hostile, or offensive working environment based on race, color, religion, ancestry, national origin sex, gender identity, sexual orientation, age, handicap, or disability.

Furthermore, FFG may hold diversity-related events or other outreach to support the objectives of our Diversity Plan. FFG will also attempt to fill vacancies and new job opportunities by promoting from within whenever possible. FFG is committed to diversity in our procurement practices. FFG will seek vendors with the goods, services, and expertise that best match our company's needs from a broad and diverse pool of vendors. FFG may hold diversity related events or other outreach to support our procurement-related diversity objectives. As previously mentioned, the Human Resources Department of TGTFC will assist with measuring the effectiveness of our Diversity Plan and recommend any changes that align with industry best practices and our Plan objectives.

IV. Proposed timelines and benchmarks for achieving our diversity objectives:

Although not yet operational, FFG will continuously track our efforts to meet the objectives contained in this Diversity Plan. FFG will strive to regularly meet our diversity goals as a company. FFG will review all diversity data collected through our applicant tracking system, People Matter,

and any relevant data on an ongoing basis. FFG will determine whether our policies are creating the desired opportunities for a diverse population of owners, investors, employees, and contractors.

V. To the extent available, the diversity status of each owner, investor, employee, and contractor:

As mentioned in the introduction, Finest Flag Gaming was formed on September 6, 2022 and has not yet commenced retail sports wagering operations in the State. As such, FFG is owned by four individuals – including three women owners who also satisfy the personal net worth criteria provided in SWARC’s regulations. FFG’s owners are committed to promoting diversity and inclusion in all aspects of our operations, and as a Baltimore-based company, our company is deeply committed to the City and surrounding region.