



WIND CREEK®
BETHLEHEM

Version: June 2019

Supplier Code of Conduct

Wind Creek Bethlehem, LLC (hereinafter “WCB”), and its subsidiaries and affiliates, strives to be model corporate citizen in local and international communities within which it works. WCB recognizes the impact a company can have and is focused on minimizing potential harm to the environment and local communities, but WCB can’t do this alone - we need your support. Your assistance and compliance with: (i) this Supplier Code of Conduct (which may be modified by WCB from time-to-time); (ii) your agreements with WCB; and (iii) all applicable laws, codes, and regulations for each jurisdiction in which you do business will ensure success of our worthy cause.

HUMAN RIGHTS

Discrimination

- Suppliers shall not discriminate against any worker on the basis of race, color, national origin, sex, gender identity, age, sexual orientation, religion, political affiliation, disability, marital status, pregnancy, or other similar factors in hiring, terms and conditions of work, or other employment practices
- The characteristics listed above may not be used as the basis for determining compensation, benefits, overtime, advancement opportunities, or disciplinary action

Harassment and Abuse

- Suppliers shall neither commit nor tolerate any form of harassment or abuse in the workplace. This includes physical abuse, verbal abuse and harassment, mental and physical coercion, sexual harassment, and psychological harassment

Women’s Rights

- Suppliers shall not terminate a female employee due to pregnancy, force use of contraception or abortion, or require a pregnancy test as a basis for employment
- Suppliers shall not expose female workers to health and safety risks that endanger reproductive health or require pregnant workers to perform unreasonably dangerous tasks.

LABOR RIGHTS

Human Trafficking

- Suppliers shall ensure that all work is voluntary
- Suppliers shall not engage in or allow any form of human trafficking, whether by force, fraud, or coercion; or any form of involuntary servitude or slavery; or any form of sex trafficking or the procurement of any commercial sex act
- Suppliers shall not use any form of forced, involuntary or coerced labor
- Suppliers shall not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses

- Suppliers shall not use misleading or fraudulent practices during the recruitment of employees or offering of employment. Suppliers shall strive to disclose to employees, in a format and language accessible to the employee, basic information regarding the key terms and conditions of employment. If required by law, suppliers shall provide an employment contract, recruitment agreement, or other required work document in writing, which shall be in a language the employee understands
- Suppliers shall not charge employees recruitment fees and shall not use recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- Suppliers shall, if required by law or contract, provide return transportation or pay for the cost of return transportation upon the end of employment
- If a contract provides, suppliers shall arrange housing for employees that meets the host country's housing and safety standards
- Workers shall be allowed to freely leave the workplace without retribution at the end of their shift and upon resignation.

Child and Juvenile Labor

- Suppliers shall neither engage in nor tolerate the use of child labor in their company and their supply chain. They shall comply with all local child labor laws and applicable international standards. Suppliers shall not employ any persons under the age of 15 or the applicable minimum legal age for employment, whichever is the highest
- Suppliers may employ juveniles who are older than the applicable legal minimum age but are younger than 18 years of age subject to certain conditions consistent with International Labor Organization Minimum Age Convention No. 138
- Suppliers shall maintain complete and accurate age documentation records verifying the age of all employees

Wages, Benefits, and Hours

- Suppliers shall comply with all applicable local wages, benefits, and working hours labor laws. They must at least pay minimum wage, in a timely manner directly to the employee, and provide legally-mandated benefits to all employees, without any unjust deductions from compensation
- Workers must not work more hours in a week than legally allowed and must be properly compensated for overtime work
- Suppliers shall keep complete, ongoing, and accurate records of employee compensation and time worked

DIVERSITY

Diversity Business Enterprises

- Supplier accepts and agrees to comply with the Diversity requirements imposed by the Pennsylvania Gaming Control Board and the Commonwealth of Pennsylvania. To this end, the Supplier shall make good faith efforts to comply with the diversity regulations of the PGCB in implementation of https://gamingcontrolboard.pa.gov/files/legislation/Current_Statute_Title_4.pdf Pennsylvania Statutes Title 4 Pa. C.S.A. Amusements § 1212. Diversity Goals of Board.
- Supplier agrees to identify and seek to utilize minority and women owned business enterprises and local businesses in the performance of its contract consistent with Wind Creek Bethlehem's Annual Diversity Plan. Supplier agrees to report the total number and value of all sub-contracts awarded to minority and women owned enterprises and local businesses and to provide a comprehensive description of its efforts to solicit and recruit such businesses for its sub-contracts.

HEALTH AND SAFETY

Work Environment

- Suppliers shall provide workers with a safe and healthy work environment in compliance with all applicable laws and regulations related to workplace conditions. Facilities must have adequate ventilation, lighting, temperature control, and bathroom facilities
- Suppliers shall ensure that buildings are structurally safe and that electrical wiring is properly maintained in good condition. Workers' right to refuse unsafe work and report unhealthy working conditions must be respected

Certificates and Permits

- Suppliers shall, in compliance with national and local building regulations, pass required safety inspections and retain the building certificate(s). Suppliers shall also obtain and continually maintain all required health and safety permits, licenses, and certificates

Safety Hazards and Emergency Response

- Suppliers shall proactively identify the causes of and mitigate harm associated with occupational health and safety hazards. This includes ensuring that facilities are not overcrowded, passageways are not blocked, and fire hazards are minimized. They shall possess and maintain all equipment and supplies necessary to prevent and address routine hazards
- Suppliers shall effectively develop and implement emergency response protocol and procedures, including an evacuation plan. They shall ensure that emergency exits are accessible, clearly marked, and open to outside or exterior stairwells
- Suppliers shall possess and maintain all equipment necessary for effective emergency response including sufficient and accessible firefighting, personal protective, and hazardous chemical equipment, fire alarms, and first aid supplies

ENVIRONMENT

Environmental Responsibility

- Suppliers shall fully comply with all local environmental laws and regulations
- Suppliers shall also use commercially reasonable efforts to conduct operations in a manner that is environmentally responsible, conserves natural resources, and minimizes pollution and harmful emissions. Suppliers shall make continuous improvements in their environmental protection strategies and measure the results
- Suppliers shall properly dispose of chemical and solid waste and shall maintain records of hazardous waste disposal. Employees who handle waste must be effectively trained on its safe handling and provided appropriate protective clothing and equipment to ensure their safety

Permits and Reporting

- Suppliers shall obtain, retain, and abide by all required environmental permits and registrations, including reporting requirements

ETHICS AND COMPLIANCE

Legal Compliance

- Suppliers shall comply with the laws of the applicable jurisdictions in which they and WCB operate

- Suppliers shall establish policies and procedures for implementing and retaining current information on all relevant local and national labor laws. Relevant changes to the law shall be timely communicated to employees
- All government-required licenses and certificates shall be retained and maintained
- Suppliers shall conduct their business in compliance with applicable fair competition and anti-trust laws

Corruption and Bribery

- Suppliers shall neither engage in nor tolerate association with any form of corruption or bribery. This includes directly or indirectly giving or accepting anything of value, including payment or other form of benefits, to a government official for the purpose of improperly influencing their decision making. Suppliers shall comply with all applicable anti-bribery laws and regulations, including the US Foreign Corruption Practices Act (FCPA) and local laws

Risk Management

- Suppliers shall develop and follow an effective process for identifying security, social, and compliance risks within their business operations. After assessing each risk, they shall take appropriate corrective action to mitigate associated harm and prevent future risk

Supply Chain

- Suppliers shall not engage in unauthorized subcontracting and shall maintain records of their subcontractors/suppliers for at least 12 months. Suppliers shall reasonably promote this or a similar Supplier Code of Conduct among its suppliers

MONITORING AND EVALUATION

Audits

- Suppliers shall allow auditors, including WCB approved third-party auditors, access to their facilities for evaluation of compliance with this Supplier Code of Conduct. They shall not falsify or refuse to produce documents. Employees must not be coached to provide misleading or inaccurate information to auditors when questioned and shall be made available for interview purposes

Recordkeeping

- Suppliers shall maintain and retain complete and accurate records including all necessary documentation (e.g. employment contracts, personnel files, payroll records, time records etc.)

Suppliers' Policies and Transparency

- Suppliers shall use reasonable efforts to i) make their employees aware of this Supplier Code of Conduct and ii) upon a request from their respective employees, make this Supplier Code of Conduct available for their employees' to review