



WIND CREEK HOSPITALITY COVID-19 RESPONSE PLAN

This plan represents Wind Creek Hospitality's effort to identify actions and practices to mitigate the risks of exposure of our Team Members and Guests to COVID-19. It was developed with input from many people, including local, state and tribal public health experts and our Team Members. We fully anticipate that these plans will evolve in reaction to new information and changing circumstances and guidance. To that end, we will continue to monitor governmental policy and updates, advice and guidance from the Centers for Disease Control (CDC), and public health advancements.

Wind Creek Hospitality operates properties in the jurisdiction of one Native American Indian tribe, four states and three countries. This plan will be adjusted for each of our properties based on location. Flexibility is central to development and implementation of this plan because it will change as new information becomes available and current information evolves. THIS PLAN IS SUBJECT TO CHANGE WITHOUT NOTICE. We provide this document to the public so that our Guests and communities will know the steps we are taking to mitigate possible exposure to COVID-19 at our properties.

OVERVIEW

Our properties are places that many people visit to enjoy a moment away from their routines. Equally important, they also provide employment to thousands of people. Short of closing permanently, no reasonable action can completely prevent the chance of COVID-19 transfer at any of our properties. We are committed to the safety and well-being of our Team Members and patrons, and that commitment is reflected in the efforts we have made to prepare this comprehensive plan.

The CDC notes, "When a novel virus with pandemic potential emerges, nonpharmaceutical interventions, which will be called community mitigation strategies ... often are the most readily available interventions to help slow transmission of the virus in communities." Throughout multiple CDC guidance documents, the concept of Social Distancing is presented as a major nonpharmaceutical intervention that can be utilized to mitigate the spread of COVID-19. Frequent and intensive cleaning regimens also feature prominently in multiple CDC guidance documents.

We incorporated CDC guidance into our COVID-19 Response Plan. Depending on the level of community COVID-19 transmission in each of the communities in which our casinos operate, our properties will employ Social Distancing for those who are not fully vaccinated. Floor markers, posters and other collateral materials will be used throughout our operations to remind Team Members and Guests who are not fully vaccinated of Social Distancing.

We have instituted rigorous ongoing cleaning procedures using "EPA-approved products from a list provided by the CDC for use against the virus that causes COVID-19" or "alternative disinfectants as cited by the CDC if the EPA-approved products are not available."

MASK WEARING POLICY

Guests Who Are Fully Vaccinated

Wearing of masks is optional. Fully vaccinated guests may congregate without consideration of Social Distancing guidance.

Guests Who Are NOT Fully Vaccinated

Masks are required. Guests who are not fully vaccinated need to follow Social Distancing guidelines.

Signage will be provided at all property guest entrances to inform guests of this new standard and to provide them with needed information.

If a Guest who is not fully vaccinated arrives without a face covering, a disposable face covering will be available in return for a charitable donation for face coverings to local charities. For not-fully-vaccinated Guests, face coverings must be worn at all times other than when required for identification purposes or while dining. If a not-fully-vaccinated Guest or Team Member (whether fully vaccinated or not) refuses to comply with wearing a face covering, they will be asked to leave. There will be a designated smoking area on premises, but smoking is no longer allowed on the floor, in bathrooms or in public spaces. Social Distancing will also be required in the designated smoking area.

TEAM MEMBERS

All Team Members will continue to wear masks regardless of vaccination status. It is possible that unvaccinated Guests will act as if they are fully vaccinated when in fact they are not. Our commitment towards reasonable steps to protect each other remains and we will continue wearing masks as Team Members for the current time.

MITIGATION EFFORTS TO LIMIT COVID-19 EXPOSURE AND SPREAD TO TEAM MEMBERS AND GUESTS

We are monitoring recommendations from the CDC and other public health sources. There are multiple points of guidance provided by the CDC that are relevant to our properties and their return to operations. The guidance varies depending upon the level of COVID-19 community transmission.

TEAM MEMBERS

Wind Creek Hospitality COVID-19 Response Plan

CDC's "Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)" document recommends that employers plan to respond in a flexible way to varying levels of transmission in the community and be prepared to refine their plans as needed. Activities noted include efforts to reduce transmission among Team Members, maintain healthy business operations, and maintain a healthy work environment.

Efforts to Reduce Transmission Among Team Members

When Wind Creek Hospitality voluntarily closed all of its facilities at the outset of the COVID-19 pandemic, we implemented important steps to assist our Team Members. Namely, we continued to provide our full-time Team Members with their wages and benefits even when our facilities were closed. Wind Creek Hospitality also took steps to protect Team Members by providing telework arrangements and/or other workplace accommodations. As we continue to resume our operations, we will continue to take steps consistent with guidance from the CDC and other public health sources to protect all our Team Members.

Wind Creek Hospitality Team Members who appear to have symptoms (e.g., fever, cough, or shortness of breath) upon arrival at work, or who exhibit symptoms during the day, will be sent home. If a Team Member is confirmed to have COVID-19 infection, we will strive to inform fellow Team Members of their possible exposure to COVID-19 in a manner consistent with applicable confidentiality and privacy requirements.

Wind Creek Hospitality will work to educate Team Members about COVID-19 based on CDC Public Health Recommendations for Community-Related Exposure. Additionally, Wind Creek has made vaccinations available to all Team Members and their households and/or provided incentives for Team Members who have received vaccinations.

Efforts to Maintain Healthy Business Operations

Wind Creek Hospitality has taken significant efforts to maintain, implement, and enforce policies and procedures in a flexible manner. In these difficult times, we have implemented supportive practices to provide Team Members with the ability to care for themselves, family members, and dependents. Wind Creek Hospitality will continue to take a supportive and flexible approach to its Team Members.

Wind Creek Hospitality's Employee Expectations Guide provides flexibility to managers to provide Team Members the ability to care for a sick family member or children due to school and childcare closures. Administrative Leave can be granted on a case-by-case basis. Wind Creek Hospitality has an employee assistance program (EAP) and will continue to make these resources available to Team Members who may need additional social, behavioural and other services, for example, to cope with the death of a loved one.

Wind Creek Hospitality seeks to inspire and empower its Team Members. We believe that each Team Member will do what they need to do to be at work and provide an escape to Guests while they are on property. Should we experience a spike in absenteeism due to increases in sick Team Members, Team Members who must stay home to care for sick family members, and those who must stay home to watch their children if dismissed from childcare programs and K-12 schools, we have contingency plans in place. Should absenteeism reach a level that we can't work around, we think such an event would coincide with a public health situation that would require our property to close.

Efforts to Maintain a Healthy Work Environment

In addition to Social Distancing and face covering protocols detailed above, and disinfection and sanitation practices, Wind Creek Hospitality has increased the ventilation rates in our properties as well as the ratio of fresh air to recirculated air within our HVAC systems. For Team Members and Guests, we will continue to provide numerous hand-sanitation dispensers throughout the properties and promote the CDC's personal hygiene recommendations.

In our Team Member workspaces, we routinely clean and disinfect all frequently touched surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. After persons suspected/confirmed to have COVID-19 have been in the facility, we also perform enhanced cleaning and disinfection of their workspaces.

For our Team Members who must travel, we will advise them before their travels to take additional preparations consistent with CDC guidance.

GUESTS

SOCIAL DISTANCING

CDC's "Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)" and OSHA's "Guidance on Preparing Workplaces for COVID-19" address multiple issues that Wind Creek Hospitality believes can help mitigate the exposure and spread of COVID-19 among our Guests when they visit our properties. In addition to these guidelines, Wind Creek Hospitality will also abide by applicable public health directives.

Collectively, these guidelines indicate that Social Distancing is an important mitigation strategy. We will continue to maintain Social Distancing at our properties for those who are not fully vaccinated, whether it be Team Member work areas, or Guest-accessible areas. Social Distancing guidance suggests that 6 feet of space should be maintained between people. Wind Creek Hospitality will develop and enforce property occupancy levels and other measures that provide a minimum of 6 feet of space between Guests who are not fully vaccinated at our properties.

Mitigation protocols will include:

- Implementation of Social Distancing measures in front-of-house and back-of-house areas for those who are not fully vaccinated.
- Focus on hygiene and sanitation practices with supplies readily available.
- Maximize opportunities for Team Members to telework.
- Limit in-person meetings, meeting for lunch in a break room, etc.
- Limit large work-related gatherings (e.g., Team Member meetings, after-work functions).
- Limit non-essential work travel.

Additionally, occupancy levels will change based on local conditions and may be less than the posted Fire Marshal Occupancy levels or those state or local law requires.

Education

Currently, the CDC states that some individuals may be considered to be at a higher risk in the event they contract or are exposed to COVID-19. Wind Creek Hospitality has implemented efforts to educate the public as to the CDC's guidance associated with increased risk for certain individuals.

- WCH will post public notice and include in media campaigns that older adults and persons with severe pre-existing health conditions are at increased risk if they contract COVID-19 and they should make any decision to visit a Wind Creek property with this risk in mind.
- Smoking will not be allowed inside the property. Designated smoking areas (with Social Distancing expected) will be provided at each property.

Level of Transmission

CDC notes that the level of transmission in our local communities and the level of transmission in the areas from which our visitors will travel can impact decisions regarding opening and closing.

- WCH will continue to monitor COVID-19 caseloads and other criteria of each county that is home to our property, and the surrounding counties that are home to our Guests.
- WCH may deny entrance to our properties to Guests who arrive from a county that may represent minimal, moderate, or substantial levels of COVID-19 community transmission.

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- WCH has consulted and will continue to consult with local, state, tribal, and other public health officials for insight and advice regarding its operations.

CONDITIONS AND RETURN TO NORMAL OPERATIONS

Property Reclosing: In the event that a controlling public authority indicates that a Wind Creek Hospitality property must be closed, we will close that property. Additionally, if we believe it is in the best interest of our Team Members and Guests to close, we will do so voluntarily, regardless of whether we are asked to do so (as we did with our first voluntary closure).

Return to Normal Operations: When it is prudent to do so, we will increase occupancy at our properties (taking into account the regional situation that applies to each), and we will continuously seek ways to enhance the sense of escape that we want every Guest to enjoy when they visit one of our properties.

Through media announcements, social media, our websites, digital properties, and Guest contact, we will let the public know the operating status of our properties.

Property Capacity

As discussed above, current guidance from the CDC and state and local health departments suggests that Social Distancing (spacing of 6 feet between individuals) should be maintained to mitigate the spread of COVID-19. While mass-gathering restrictions and/or Social Distancing guidance remains in place, Wind Creek Hospitality will establish occupancy in its gaming and other publicly accessible areas in accordance with CDC and state and local guidelines and orders.

We will ask our Guests who are not fully vaccinated to maintain 6 feet of Social Distancing at all times. For Guests who are not fully vaccinated who visit our properties alone, we will encourage them to maintain a 6-foot distance from other people.

If, after repeated requests by our staff to maintain Social Distancing spacing, someone or a group continues to infringe upon the Social Distancing space of another person or group, the offending person or group will be asked to leave the property. Wind Creek Hospitality reserves the right to enforce its Social Distancing guidelines in its sole discretion.

Hotel Occupancy

Social Distancing guidance remains in place for those who are not fully vaccinated.

Restaurants

While Social Distancing guidance remains in place, we have reconfigured our restaurant seating to provide Social Distancing space between diners. Additionally, all self-service dining options will be replaced with wait-staff service only. In all instances, we will operate our restaurants or food service and dining offerings pursuant to applicable guidelines or orders.

Other Amenities

Other amenities at our properties may or may not be available to the public until a return to normal operations. Other amenities that we do open to the public will be offered under the same criteria that apply to our other public spaces, and with other appropriate steps as may apply to the unique offering of each amenity.

Valet parking will soon reopen with Team Members wearing gloves and car windows remaining open. Check with your local property for details.