



COVID-19 Preparation, Planning and Implementation

Executive Summary

We care deeply about our employees and customers. Oneida Casino is committed to providing and adopting safe and healthy workplace protocols for all our employees and customers. Make no mistake, the world of work will never be same again.

The Gaming Division's Senior Management Team and Staff extensively researched health and safety requirements for the reopening of our Main, Mason, and IMAC properties. The below reopening plan was submitted for review to Public Health Manager, Comprehensive Health Medical Division Director, and Division Director Comprehensive Health Operations.

Gaming Senior Management worked diligently and collaboratively with the Oneida Gaming Commission and reviewed the NIGC Reopening Guidance. We also referenced the Wynn Las Vegas Health and Sanitation Program to ensure our reopening plan aligns with new health guidelines and gaming regulations.

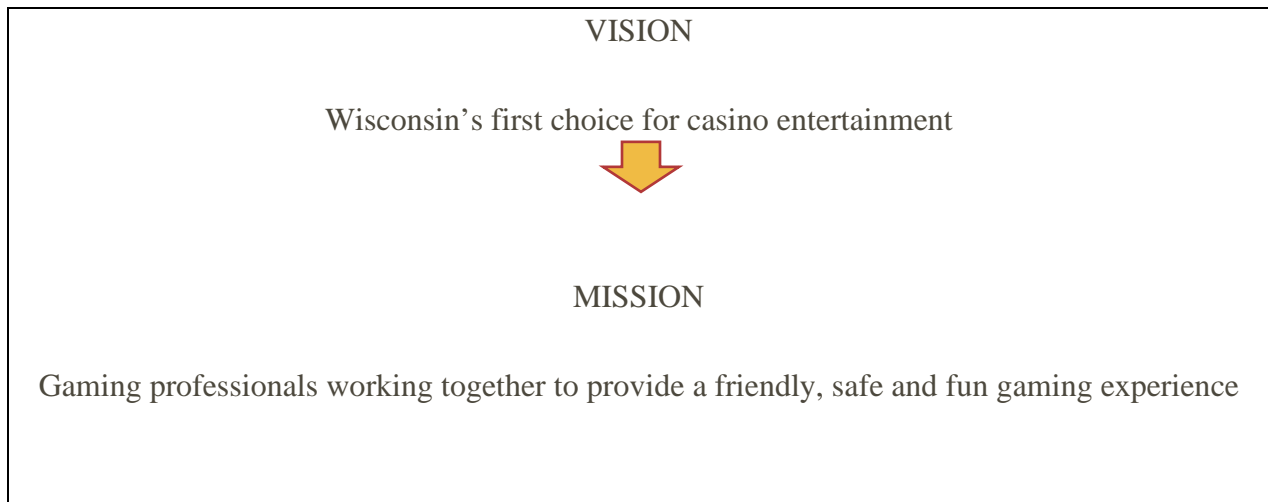
The Gaming operation administered a customer survey. The review of survey results increased our awareness of customers' top safety concerns and interest in returning to our casinos. Based on the survey results, we adjusted operating hours to allow for early morning deep cleaning at all operational properties. Our plan ensures the safety and social distancing of our customers to the greatest extent feasible.

We have participated in multiple meetings with the Oneida Business Committee and the Oneida Team of Health Professionals. The following safeguards have been established to prevent the spread of the COVID-19 virus:

1. Face masks will be required for employees in certain areas. Options include reusable masks made by the Oneida Wardrobe Department or disposable face masks purchased from an outside vendor.
2. Face mask will be required for customers upon opening and will be subject to change.
3. Temperature checks and a brief health questionnaire of incoming employees every shift.
4. Notifications: Communication will be visible via, SharePoint, email, text, social media, in-house digital signage, outdoor advertising, and direct mail. Public address announcements promoting social distancing and responsible hygiene.
5. Facilities has established a cleaning protocol during COVID-19 social distancing.
6. Employees returning from furlough will receive training on the following subjects:
 - a. Social Distancing
 - b. Staying home when you are sick
 - c. Covering your cough or sneeze with a tissue
 - d. Proper hand washing techniques
 - e. Avoiding contact with your eyes, nose, and mouth
 - f. Proper sanitizing protocols
7. Security will monitor customer flow and capacity limits at each of our properties.

The health and safety of our employees and customers is extremely important to Oneida Casino and we will continue to make this our top priority.

The Gaming Division maintains alignment with our Vision, Mission and Strategy.



CURRENT STATE

- State of Wisconsin- Department of Health Services Emergency Order #28,
 - Enforcement and Applicability
 - 17. Tribal Nations
 - Activities by Tribal members within the boundaries of their Tribal reservations and federal land held in trust for any one of the eleven federally recognized Tribes in Wisconsin are exempt from the restrictions in this Order but may be subject to restrictions by Tribal authorities.
 - Non-tribal members should be respectful of and avoid non-essential travel to Tribal territory.
 - Wisconsin's local governments shall coordinate, collaborate, and share information with the Tribal Nations in their region.
- Oneida Nation COVID-19 Core Decision Making Team Declaration- Updated Safer at Home
 - 2. Business Operations
 - a. Non-Essential Business and Operations Must Cease. All for profit and non-profit businesses within the Reservation, except Essential Businesses and Operations as defined below, must cease all activities, except:
 - i. Minimum Basis Operations, as defined below
 - ii. Any operations consisting exclusively of employees or contractors performing activities at their own home or residences (i.e., working from home).

PLAN

The current plan is to open a limited operation, which would consist of slot machines for play, at three of our properties – Main-Airport, Irene Moore Activity Center and West Mason. The hours of operation would be from 8 am until 4 am daily, seven (7) days a week.

Customer entrances would be located at:

Main Casino- North Side Ramp Entrance and South Side Valet Entrance

IMAC- West Side Annex Entrance only

W. Mason - North side Canopy Entrance only

HEALTH & SAFETY PROGRAM

- **Employee and Guest Health-** The health and safety of our employees and guests is our number one priority.
 - Face mask will be required for customers upon opening and will be subject to change.
 - **Notification:** Employees and guests will be constantly reminded to practice safe distancing and responsible hygiene as required. This communication will be visible to both employees and guests via email, text, social media, in house advertising, external advertising, direct mail and announcements.
 - **Physical Distancing.** To the greatest extent feasible guests will be advised to practice physical distancing by standing at least six feet apart while standing in lines. Slot machines and other physical layouts will be arranged to ensure proper distancing. Employees will be reminded not to touch their faces and to practice physical distancing by standing at least six feet away from guests and other employees whenever possible. Occupancy limits will be adhered to.
 - **Hand Sanitizer-** Hand sanitizer dispensers, touchless if possible, will be placed at key guest and employee entrances and contact areas such as the gaming floor, reception areas, restaurants, and high traffic customer and employee areas.
 - **Front of the House Signage-** Front of the house signage will consist of reminders of the safety expectations at Oneida Casino.
 - **Back of the House Signage-** Back of house signage will remind employees of safety expectations at Oneida Casino.
 - **Employee & Guest Health Concerns-** Oneida Nation's Health Professionals will be the direct contact if there are any concerns with COVID-19 cases.
- **Mandated Employee Training**
 - Physical changes
 - Plexiglass installed
 - Floor markings in place to guide employees and customers
 - Equipment moves in departments
 - Beverage distribution changes for customer and employee
 - Administrative changes
 - Slot only

- Virtual and safe distancing meeting
 - Safe workplace training and educational materials
 - Daily casino closure for deep clean sanitizing
 - Required safety practices
 - Safety masks worn by employees based on their roles
 - Describing how to wear
 - Gloves utilized when sanitizing surfaces and how to handle and dispose
 - Social Distancing and what that means
 - Hand Hygiene, how to and when to wash
 - Helping others follow safety rules
 - Empower employees to help others follow safety rules
 - Symptoms of COVID 19
- **Employee Responsibility**
 - **Protection/Hand Washing-** Encourage all employees when coughing or sneezing to utilize etiquette by utilizing the elbow area to cover. Correct hygiene and frequent handwashing with soap is vital to help combat the spread of the virus. All Oneida Casino employees will be instructed to wash their hands or utilize hand sanitizer frequently following activities such as using restroom, sneezing, touching the face, blowing the nose, cleaning, sweeping, mopping, smoking, eating, drinking, entering and leaving the gaming floor, going on break, and before or after starting a shift.
 - **COVID-19 Training-** All Employees will receive training on COVID-19 safety and sanitation protocols.
 - **Personal Protective Equipment (PPE)-** Appropriate PPE will be worn by employees in collaboration with Oneida Nation Health Professionals, as well as information sought out by the Center for Disease Control. (CDC). Employees who are mandated to wear masks will be provided one. Employees who are highly recommended to wear or optional will provide their own facial covering. Plexiglass will be put up as a barrier at all points where employees are working static jobs with customer interaction such as: Cage Cashier, Players Club Team Member, Restaurant Podiums, etc.
 - **Daily Pre-Shift & Timekeeping-** To the greatest extent feasible an attempt will be made to stagger employee arrival start and end times to minimize traffic volume in behind the house corridors. Time clocks will have six-foot spaces measured out in order to adhere to social distancing. Hand sanitizer will be available at each timeclock location and employees will be required to sanitize after clocking in and out.
- **The Guest Journey**
 - **Guest Arrival-** Customers will have a dedicated entrance per locations, along with constant communication about expectations and responsible behavior.
 - Customers will be required to wear facemasks.
 - Smoking will be prohibited upon opening and will be assessed.
 - Security will be monitoring the guest capacity in the three casinos, not to exceed the determined threshold.

SAFETY/CLEANING MITIGATION PLANS FOR SPECIFIC DEPARTMENTS

- **Slots**
 - Minimize Contact with Guests:
 - Only interact when asked to or via change light (ex. to sanitize and or hold machine)
 - Make PA announcements regarding need to use the change lights
 - To the greatest extent feasible keep distances when servicing machines
 - Ask guest to remove Players Club card when needed.
 - Wipe down machine surfaces before and after servicing
 - Ask guest to step far enough away to maintain safety
 - Jackpot payouts
 - Write down driver's license information and SS ID information without handling cards
 - Count cash onto chair or another flat surface
 - Do not hand money directly to guest
 - Wipe down pen and sanitize hands after the payout
 - Cleaning
 - Assist custodial in wiping down machines after each customer finishes playing
- **Accounting Operations**
 - ID and credit card readers will be placed for the customers to utilize themselves.
 - Hand sanitizer station placed next to the Cage window for customer use
 - Hand sanitizer stations placed next to every NRT we put into service and every ATM
 - Using disinfected wipes from within the Cage, the Cashier wipes down the counter and card reader between every customer interaction.
- **Marketing Executive Services**
 - Create customer distance squares away from VIP Lounge desks.
 - Cleaning for area: each host will be responsible for cleaning their workstation prior to and ending their shift. Each host will be stationed with social distancing in mind.
 - Popcorn, water and business center will remain shut down.
- **Marketing Players Club**
 - Players Club:
 - Conduct cleaning/sanitizing procedures prior to opening and/or prior to taking over for another employee
 - After each guest interaction the employee will sanitize work area
 - To the greatest extent feasible ensure customers are practicing social distancing by standing on 6ft marker on floor and limiting their interaction to only what is necessary
 - Ensure employees are practicing social distancing
 - Guests will be asked to verbally read their Players Club number to the club employee.
 - Additional safety signage will be visible to customers upon approaching
- **F&B**
 - **The Lodge**
 - Opening a grab n' go concept

- Safe handling practices
 - Social distance seating will be enforced
 - Gloves and masks will be worn based on menu and distribution of food
 - **Spectra**
 - Deli Menu will be limited
 - Hours will be 11 am to 8 pm daily
 - Social distancing and seating will be implemented
 - Continuous cleaning and sanitizing will occur
 - Gloves and masks will be worn
 - **Radisson**
 - Noodle Bar opened from 11am to 11pm daily and 12 pm on weekends
 - Limited menu
 - Glove and masks will be worn
 - Continuous cleaning and sanitizing will happen, as well as lines for 6-foot social distancing
- **Customer Service**
 - Watch machines for guest – while maintaining safe distance
 - Assist guest with drinks from self-serve
 - Self Service stations will be accessed by employees only
- **Custodial**
 - To the greatest extent feasible, slot machines will be wiped down to ensure that we keep our customers safe.
 - Frequent disinfecting will consist of:
 - 1-2 person teams continual moving through the facility cleaning only machines.
 - Attempting to clean each machine after each use
 - Deep cleaning of all usable slot machines daily from 4 am to 8 am.
 - To the greatest extent feasible clean and sanitize 100% of facilities and equipment for opening to the public and Oneida personnel returning for business. Train, educate and communicate all additional duties, responsibilities and expectation with this new process.
 - Due to Health and Safety for all guests and Oneida personnel, the Custodial department will be essential. Along with normal daily cleaning of the facilities, additional cleaning/sanitizing wipes will be used to entail:
 - Wiping down frequently touched surfaces hourly- doors, counters, windows, elevators, escalators, chairs, printers, etc....
 - Clean restrooms hourly
 - Clean ATM's, NRT's, Key Watchers, Time Clocks hourly
 - Clean shared equipment every shift
 - Employees will be trained on the proper use of PPE and cleaning supplies. Includes other departments that are also assisting with cleaning.
 - Training will include when to use PPE, what PPE is necessary, how to properly put on, use, and take off, and how to properly dispose of PPE; Trained on any chemical hazards
 - Other product offerings:

- Hand Sanitizer- strategically placed throughout the facilities for high traffic frequently touched areas and where customer and employee transactions take place
- Sneeze guards by all transaction windows and counter spaces that are utilized for customer and employee interaction
- **Security**
 - Minimize contact with guests, only If necessary
 - To the greatest extent feasible always keep social distancing guidelines when interacting with guests
 - Require the use of gloves and proper disposal when handling customer ID's
 - Wipe down common space areas frequently throughout shifts
 - Monitor and address possible symptoms of employees and customers
 - Medical responses will follow the internal incident protocol. EMS will be contacted if deemed necessary

METHODOLOGY

The Oneida Casino re-opening plan was developed through an analysis of published procedures used by other gaming facilities nationwide, in conjunction with Oneida Nation health experts, and through the expertise of the Oneida Casino management and staff. In addition, SMT developed this plan and associated training regimen through reliance on CDC and the Occupations Safety and Health Administration (“OSHA”) standards and recommendations.

CDC is responding to a pandemic of COVID-19, a respiratory disease spreading from person to person. This situation poses a serious public health risk. The federal government is working closely with tribal, state, local, and territorial partners, as well as public health partners, to respond to this situation. COVID-19 can cause mild to severe illness; most severe illness occurs in adults 65 years and older and people of any age with serious underlying medical problems.

CDC Guidelines for Opening Up America Again:

Guidelines for all Phases- Individuals

- CONTINUE TO PRACTICE GOOD HYGIENE
- Wash your hands with soap and water or use hand sanitizer, especially after touching frequently used items or surfaces.
- Avoid touching your face.
- Sneeze or cough into a tissue, or the inside of your elbow.
- Disinfect frequently used items and surfaces as much as possible.
- Strongly consider using face coverings while in public, and particularly when using mass transit.
- PEOPLE WHO FEEL SICK SHOULD STAY HOME
- Do not go to work or school.
- Contact and follow the advice of your medical provider.

Guidelines for all Phases- Employers

Develop and implement appropriate policies, in accordance with Federal, State, and local regulations and guidance, and informed by industry best practices, regarding:

- Social distancing and protective equipment
- Temperature checks
- Sanitation
- Use and disinfection of common and high-traffic areas
- Monitor workforce for indicative symptoms. Do not allow symptomatic people to physically return to work until cleared by a medical provider.
- Develop and implement policies and procedures for workforce contact tracing following employee COVID+ test.

Along with the CDC information the following has also been researched and implemented.

The Oneida Casino is committed to protecting the health and safety of our employees and customers during these unprecedented times of a pandemic and have therefore followed industry-specific guidance when developing workplace controls to help reduce our employees', customers' and vendors' exposure to COVID-19. As a major financial contributor to the Oneida Nation, we play a key role in protecting the health and safety of our human resources as well as limiting the impact on our economy. We believe our *Casino Reopening Plan* will help protect them and lessen the impact of the pandemic on our economy.

Measures for protecting employees from exposure to, COVID-19, depend on the type of work being performed and exposure risk, including potential for interaction with people with suspected or confirmed COVID-19 and contamination of the work environment. We have adapted infection control strategies based on a thorough hazard assessment, using appropriate combinations of engineering (physical) and administrative controls, safe work practices; including training, and personal protective equipment (PPE) to prevent worker exposures.

We have followed OSHA's *Guidance on Preparing Workplaces for COVID-19*, as recommended by the CDC, to help prevent work exposure to COVID-19 as it applies to all U.S. workers and employers. Per OSHA's *Occupational Risk Pyramid for COVID-19*, our workers fall in the Medium or Lower Exposure Risk Levels of the pyramid based on their job tasks. Workers in the medium level may have contact with the general public and some examples include schools and high-volume retail settings. Workers in the lower level have minimal occupational contact with the public and other coworkers. Our workers do not fall in the High or Very High Exposure Risk Levels as they do not have high potential for exposure to known or suspected sources of COVID-19 during their work.

This Plan presents what workplace controls we have and will put in place to prevent the spread of COVID-19 and represents what we will do to keep our employees, customers and vendors safe. Each business unit within Gaming has its own customized COVID-19 Protocols, even

more detailed than this document. In addition, we have completed a Hazard Risk Assessment regarding employees and their use of protective face masks; which we will and have provided to them. These three documents rely on current science and sanitization methods from CDC and OSHA regarding COVID-19. We will continue to refine, and update are plan as we receive more expert guidance from our Oneida Nation Health Officials and as CDC and OSHA make changes to their guidelines. Our standard setting enabled us to pass a rigorous health inspection from the Oneida leaders in our medical community for our Casino Reopening Plan.