

Your Safety is Our Priority



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COVID-19 Safety & Sanitation Plan



Four Winds Casinos

COVID-19 Safety & Sanitation

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Dear Four Winds Guest,

On behalf of the entire Four Winds Casinos management team I would personally like to thank each and every one of you for your patience and continued support. As we face this new normal together, please rest assured that we have taken great effort to be open to the public in a manner that will protect your health and safety, as well as the health and safety of our employees.

In this document you will find an overview of new standards, procedures and changes to our amenities and offerings we have implemented to comply with current social distancing guidelines and CDC recommendations. Although the decision to make these modifications has been difficult, these changes are necessary in the current environment.

As we have adapted to these changes, we will also need your continued cooperation to ensure that you, along with other guests, will have an enjoyable entertainment experience. In addition, we can promise you that exceeding your expectations and providing excellent customer service also remain our top priorities. We will continue to strive to ensure that your Four Winds experience will serve as a much needed, yet safe, escape.

Please stay safe and we look forward to seeing you soon.

Sincerely,

A handwritten signature in cursive script that reads "Frank Freedman".

Frank Freedman, Chief Operating Officer

INTRODUCTION

The information contained in this Plan represents current practices which have been developed as a result of the COVID-19 pandemic as a guideline to assist our employees and guests in regards to best practices and recommended protocol in order to make the best possible efforts to provide a safe and secure environment at our properties. Please note that references to “personal protective equipment” contained within this document or any internal training documentation are not intended as a use of that term as it is defined by the Occupational Safety & Health Administration (OSHA).

It is important to remember that these guidelines will remain dynamic in nature, as we are monitoring guidance issued daily by federal, state, tribal and local agencies; and making changes in accordance. This document is not the entirety of our plan to address these issues we are facing. Departmental training documents and plans have also been created in order to address the unique responsibilities and processes within that area of operation.

Please be advised that some or all of the information contained in this document may not be applicable to other gaming enterprises, industries or businesses. We strongly recommend that before implementing any of the ideas contained herein you carefully evaluate, and consult with legal counsel as appropriate, the legality, applicability and potential efficacy of this information in your place of business. The Pokagon Gaming Authority dba Four Winds Casinos bears no responsibility for any circumstances arising out of or related to the adoption, or decision not to adopt, any of the practices or procedures contained in this Plan.

ABOUT COVID – 19

The virus primarily spreads via respiratory droplets produced when an infected person sneezes or coughs.

It spreads between people who are in close contact (within about 6 feet/2 meters).

At this point in time, The Centers for Disease Control and Prevention (CDC) have identified the symptoms listed below. Please refer to <https://www.cdc.gov/> for updates as well as your local public health authority for local guidance and regulations.

People with COVID-19 have had a wide range of symptoms reported – ranging from mild symptoms to severe illness including death. Older adults and those with severe underlying medical conditions like heart or lung disease, diabetes and others seem to be at higher risk for developing serious complications from COVID-19 illness.

It is important to note that there are people confirmed to have contracted COVID-19 who have shown no symptoms (asymptomatic).

The following symptoms may appear 2-14 days after exposure to the virus. Please note that this is a non-exhaustive list and a full list of symptoms is available at the CDC website at: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

Fever or chills
Cough
Shortness of breath or difficulty breathing
Fatigue or inability to wake
Muscle or body aches
Headache
Sore throat
New loss of taste or smell
Congestion or runny nose
Nausea or vomiting
Diarrhea
New: Confusion

IF YOU HAVE ANY OF THESE SYMPTOMS OR ARE LIVING WITH OR IN CLOSE CONTACT WITH PERSONS WITH THESE SYMPTOMS YOU MUST STAY HOME AND SHOULD CALL YOUR DOCTOR.

TRANSMISSION OF COVID-19

Current guidance suggests that close contact with an infected individual via sneezing or coughing is a common transmission method. In addition, it can be transmitted by touching contaminated surfaces and then the transfer of the virus by touching the contaminated hands to the face (particularly the eyes, nose and mouth). Both of these transmission methods can be prevented with good hand hygiene, social or physical distancing and wearing an approved mask. Current scientific advice is that COVID-19 is very unlikely to be spread by food.

COVID-19 is thought to survive on hard surfaces for up to three days which is why the cleaning and disinfection routines we are deploying throughout our properties is critical to minimize its spread. Everyone should do their part to stay informed of the latest available information regarding the coronavirus including transmission routes, symptoms, what to do if they become ill, self-isolation requirements and other relevant information to be able to effectively control the spread of coronavirus.

All persons should consider the current recommendations by health officials regarding travel and gathering and recognize that there is a risk of exposure to COVID-19 whenever we leave the safety of a controlled home environment.

EMPLOYEE HEALTH SCREENINGS

All Four Winds employees are being required to self-monitor for symptoms of COVID -19 and asked not to report to work if they or someone they are in close contact with, are experiencing symptoms or have been diagnosed with COVID - 19.

All employees are being screened at dedicated employee entrances by a Security Officer who will administer a non-contact temperature check and will be subject to a health questionnaire regarding symptoms. Those experiencing symptoms or with an elevated temperature, will be denied entry.

CASE NOTIFICATION

If we are alerted to a presumptive case of COVID-19 at a Four Winds property, whether it be regarding an employee or guest, Risk Management will work with local health officials, including Pokagon Health Services, to follow the appropriate actions recommended.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Appropriate PPE will be worn by all employees based on their role and responsibilities and in adherence to applicable regulations and guidance. Training on how to properly use and dispose of all PPE will be mandatory. Every employee entering the resort is required to wear an approved mask while on property. Gloves will be provided to employees whose responsibilities require them as determined by the available expert guidance including housekeeping, public area attendants and security officers in direct contact with guests.

EMPLOYEE HYGIENE/BEHAVIOR

All employees will be reminded to ensure proper hygiene and sanitary behaviors. Examples of such guidance are as follows:

- ✓ Properly cleanse oneself and maintain good hygiene, prior to reporting for work.
- ✓ Always sneeze/cough into an elbow or otherwise covering your face in a manner that will reduce the risk of spreading the particles. This includes when you are wearing a face mask.
- ✓ Maintain a clean workspace. Regularly disinfect your workspace with the materials provided to you. Ensure that whenever a guest or another employee enters your workspace and makes physical contact with items in your workspace that those items are sanitized following the visitor's departure.

✓

HANDWASHING

- ✓ Frequent handwashing with soap is vital to help combat the spread of the virus.
- ✓ If soap and water are not available, hand sanitizer should be used.
- ✓ Hand sanitizers (at least 60% alcohol) are made available throughout the properties, including– at the staff entrance/exit, office areas, at all hand washing sinks in the front of house and back of house, employee changing rooms, host stands, point of sales, bars, restrooms, etc.
- ✓ Wash hands or sanitize at least once every 60 minutes (for 20-seconds if washing with soap) and after any of the following activities: using the 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.

Follow these steps to properly wash or sanitize:

Practice and promote **proper hand hygiene**.



1 WET
hands with clean running water, turn off the tap and apply soap.



2 LATHER
the back of hands, between fingers and under nails.



3 SCRUB
for at least 20 seconds.



4 RINSE
hands well under clean running water.



5 DRY
hands using a clean towel or air dryer.



IF SOAP AND WATER ARE NOT AVAILABLE,
use an alcohol-based hand sanitizer

- ✓ Allow sanitizer to dry before touching any other surfaces.



- ✓ Alcohol based sanitizers can be **flammable**. Please take caution when using any flammable products.

HAND SANITIZING TECHNIQUE



1 Apply hand sanitizer to the palm of one hand, covering all surfaces.



2 Cover whole surface of hands, rubbing palm to palm.



3 Spread the sanitizer solution over the back of each hand including the wrists with fingers interlaced.



4 Rub palm to palm with fingers interlaced.



5 Grip the fingers on each hand and rub in a sideways back and forth movement.



6 Clasp each thumb in the opposite hand and rotate.



7 Press fingers into palm of each hand and rotate.



8 Once dry, your hands are sanitized.

PHYSICAL DISTANCING

All guests and employees are expected to adhere to social distancing guidelines in all areas of the facilities. The current social distancing guidelines require maintaining at least a six (6) foot distance from others.

- ✓ Employees shall avoid all personal contact when greeting other employees and guests - like shaking hands and hugging.
- ✓ Floor markings have been added in both front of house and back of house areas where people may have a need to congregate or “line up,” in an effort to provide visual assistance in distancing measures.
 - Please note that even where visual markings are not present, you are still expected to maintain appropriate distance from others.

SHARED EQUIPMENT

Many of our employees have positions and/or duties which require them to share equipment and/or spaces with other employees or guests. Such situations pose difficulties with maintaining sanitation and cleanliness and preventing the spread of germs and viruses. As such, all employees are required to sanitize such equipment and spaces and have been provided specific guidelines as to how to in a manner that will be effective in killing potential virus contamination.

SECTION 2: GUEST PROTOCOLS

GUEST ARRIVAL & PARKING

In an effort to monitor all arrivals and departures from property as well as to promote proper social distancing, routes have been established for guest arrival, entry and exit.

A security officer will greet each guest at the main entry point. Vehicles containing Minors or pets (other than service animals) will be denied entry.

- ✓ There will be one traffic route onto each property for guests. In New Buffalo in particular, protocols have been established for entry from the rear property entrance as well, directing guests to the main entry point.
- ✓ Valet parking, chauffeur services, bus lines and shuttle services will be unavailable to our guests until further notice.
- ✓ Upon parking their vehicle, guests will proceed to a clearly marked entry path where the below described entrance screening will take place. Markings along this path will be placed at the appropriate distance to ensure social distancing.
- ✓ Visitors will also be asked to follow proper hygiene (including hand sanitizer and/or hand washing) and to wear a mask (which will be provided by Four Winds). Personal masks will be accepted as long as the mask is non-offensive in nature.
- ✓ Appropriate signage will also be prominently displayed at entries (as well as throughout the property) outlining proper mask usage, physical distancing and proper hand washing/sanitizing.

MINORS

No person under the age of twenty-one (21) will be allowed entry into any Four Winds property until further notice.

GUEST HEALTH & SCREENING

- As indicated above, all guests will be required to submit to a health screening by our Security team upon entry into the facility, similar to the screening process for our employees.
- At entry screening, any guest who answers positively to experiencing symptoms and/or whose temperature reads above 100.4° F, will be refused entry in an effort to protect our guests and employees. Initial screenings that result in a positive result, will be subject to a discreet secondary screening for confirmation.
- All guests denied entry due to temperature and/or symptoms, will be provided COVID – 19 information including general guidance as well as a listing of local health resources.
 - The guest may also receive a temporary trespass from Four Winds properties. The temporary trespass can be rescinded upon appropriate medical clearance of the guest.

PERSONAL PROTECTIVE EQUIPMENT/HYGIENE

As noted previously, all guests are required to wear a protective mask while in all public areas of the facility.

- ✓ Guests may wear their own mask if they prefer. However, personally owned masks must be non-offensive in nature and designed similar to a surgical mask.
- ✓ The mask must be worn at all times that the guest is in any public area of the facility, with certain exclusions which include but may not be limited to:
 - In restaurant facilities – ONLY once your food has arrived, for consumption of the meal.
 - When asked to remove your mask in order to verify identity.
- ✓ Appropriate signage is posted reminding guests who choose to dispose of their masks, to properly dispose in designated trash receptacles upon departure.
- ✓ Sanitizer stations are available throughout the properties, as well as signage with guidance on appropriate handwashing/sanitizing techniques.

Guests are not allowed to smoke inside of the facilities until further notice and may only smoke in designated exterior locations.



SECTION 3: FACILITIES

INCREASED SANITATION EFFORTS

Four Winds utilizes cleaning products and protocols which meet guidelines and are approved for use and effective against viruses, bacteria and other airborne and bloodborne pathogens. We continue to work with our vendors, distribution partners and suppliers to ensure an uninterrupted supply of these cleaning supplies and the necessary PPE for our environmental services staff.

Public Spaces - The frequency of cleaning and sanitizing has been increased in all public spaces with an emphasis on frequent contact surfaces including, but not limited to: counters, bell desks, elevators and elevator buttons, door handles, public bathrooms (see below), room keys and locks, ATMs, hand railings, casino cage counters, gaming machines, gaming tables, gym equipment, dining surfaces and seating areas, push plates, door frames, light switches, drinking fountains, cabinet handles, hand sanitizer units, public information kiosks.

Back of the House - The frequency of cleaning and sanitizing has also increased in high traffic back of house areas with an emphasis on the employee dining rooms, employee entrances, wardrobe departments, employee restrooms, loading docks, offices, kitchens, security podiums, service desks and training classrooms.

Restrooms – Particular care is given to all public restrooms with an emphasis on increased cleaning and sanitizing of all contact surfaces. All public restrooms will be closed down for a period of deep cleaning at least once per shift (on a rotating basis, so that there are always restroom facilities available).

RESTAURANT/BAR FACILITIES

- ✓ All Four Winds Restaurants and Bars have reduced seating capacities to allow for appropriate social distancing between each seated group/party of guests.
- ✓ Due to the self-serve nature of the offerings, the Buffets are unavailable until further notice. Once opened, precautionary measures will be enforced.
- ✓ Condiments to be served in single use containers (either disposable or in containers which are washed after each use).
- ✓ Check presenters and all other reusable guest contact items will be sanitized after each use. Pens are single use or sanitized regularly
- ✓ Menu options include both virtual options and disposable options.
- ✓ Kitchens and all equipment both front and back of house, are deep cleaned and sanitized at least once per day.
- ✓ Employees will monitor physical distancing at entries, waiting areas and queues (in addition to signage and floor markings).
- ✓ Signage and/or floor markings are posted in food pick up areas to promote social distancing.
- ✓ Casino Service Bars are staffed to allow for appropriate distancing between employees.
- ✓ All food and beverage items to be placed on the table, counter, slot or other surface instead of being handed directly to a guest.
- ✓ Self-serve drink stations are frequently sanitized and have safety measures in place to help keep guests safe.
 - Hand sanitizer stations at all beverage self-serve drink stations
 - Floor markers for social distancing
 - Individually wrapped straws, sweeteners, sugar and creamers
- ✓ Beverage servers will deliver beers and cocktails in covered, ungarnished cups.

GAMING FLOOR

Primarily, the Four Winds properties are a gaming entertainment proposition. As such, our goal is to provide as many amenities to our guests on our gaming floor as possible, while still maintaining a safe environment for our guest as well as our employees serving these guests.

With that in mind, many of our offerings will be limited initially with the goal of phasing in offerings as it becomes safe to do so. Some of the measures and precautions that you can expect on our gaming floor are as follows:

Slot Floor/W Club/Gifting Centers/Cage:

- ✓ Seats and machines are sanitized regularly.
- ✓ Select slot machines have been taken out of service and the chairs removed to allow for appropriate distancing between guests.
- ✓ Guests to maintain six feet of separation (with appropriate queuing measures in place) while waiting in line at the W Club, Guest Service counters, Cage and Gifting Center.
- ✓ Plexi-glass Dividers are in place at counters to provide additional separation between guests and employees.
- ✓ Pens used by guests for signature purposes are one-use or are sanitized regularly. Guests are allowed to keep the pen or dispose of it.

Table Games:

- ✓ Dedicated staff members to sanitize table game rails, chairs and player positions regularly.
- ✓ Dealers and/or Supervisors to sanitize equipment such as shuffle machines, dealing shoes, sticks, etc. periodically between games.
- ✓ Dice handled by a guest are disinfected at each inspection.
- ✓ Single decks of cards may be disinfected at select intervals in order to minimize risk of contamination.
- ✓ Guests will not be offered the option to cut the deck in Blackjack.
- ✓ Pits and Tables opened in a manner that will allow for appropriate social distancing between players at tables.

- ✓ Three-four guest maximum per Table Game, depending upon the particular table size.
- ✓ Plexiglass dividers have been added to select games in order to provide separation between positions to safely increase the available number of positions.
- ✓ Discourage unrelated guests from congregating behind players.
- ✓ Dealers to verbally give breaks instead of “tapping in” and maintain appropriate separation.
- ✓ Hand Sanitizer will be maintained in the Pits and offered to both employees and guests periodically.

Poker Room:

- ✓ Dedicated staff members will sanitize the table rails and chairs on a regular basis. Prior to sitting a new player, the position will be disinfected by a staff member. Cards will be replaced on a regular basis and disinfected by a staff member.
- ✓ Hand sanitizer will be maintained at each table as well as located throughout the room for guest and employee use.
- ✓ Poker room employees will be required to wash their hands on each break.
- ✓ A maximum of seven players will be allowed per table in order to adhere to social distancing.
- ✓ Guests will not be allowed to congregate in the room, at the entrance, or to stand behind players.
- ✓ No food service will be permitted in the Poker room.
- ✓ The Poker Room will receive a deep cleaning each day during closure.
- ✓

Keno:

- ✓ Keno is currently not being offered.

HOTEL & SUPPORT SERVICES

The Four Winds New Buffalo hotel towers will ensure appropriate safeguards for our guests and hotel employees. The following protocols, at a minimum, will be in place:

- ✓ Valet Service is unavailable until further notice.
- ✓ One Coat Check Attendant will be scheduled per shift. They will wear gloves and masks and change gloves every hour.
 - Coats will be placed on every 3rd coat hanger on white rail units. Dowagiac will place all coats in day bags.
 - Counter and plexiglass will be sanitized throughout the shift.
- ✓ The Pool deck weather permitting is open with appropriate protocols in place regarding handling of used linens and social distancing.
- ✓ The hot tub and Fitness Center is closed until further notice.
- ✓ Guests requesting bell service will be assisted with care and the bell cart will be sanitized after assistance to each guest is complete.
- ✓ Queuing of lines at the check in counter, to include floor markings for social distancing.
- ✓ Dedicated staff members to sanitize elevator buttons on a continuous basis.
- ✓ In addition, the number of parties allowed on an elevator at one time will be limited, with signage posted reflecting the limitation.
- ✓ Our usual industry leading cleaning protocols will be used to clean guest rooms, with enhancements for sanitation with particular attention paid to high-touch items including television remote controls, toilet seats and handles, door and furniture handles, water faucet handles, nightstands, telephones, in-room control panels, light switches, temperature control panels, alarm clocks, luggage racks and flooring.
- ✓ All bed linen and laundry will be changed at checkout and continue to be washed at a high temperature and in accordance with CDC guidelines. Extra precautions will be taken when handling dirty linens in the room in order to eliminate excess contact while being transported to the laundry facility.
- ✓ In the event of presumptive case of COVID-19 for a Hotel guest, the guest's room will be removed from service and quarantined. In the event of a positive case, the room will only be returned to service after undergoing an enhanced sanitization protocol.
- ✓ Vending and ice machines will be sanitized at regular intervals.
- ✓ In an effort to minimize contact between employees and guests, room service will be unavailable and housekeeping services will only occur upon departure of the guest. Toiletry and towel replenishments will be left outside of the room.

RETAIL

Guest occupancy limits will be enforced to allow for appropriate distancing in our open retail spaces.

We will ensure regular cleaning and sanitizing of our retail spaces.

ENTERTAINMENT

In order to ensure proper social distancing and guidelines related to large gatherings, the Silver Creek Event Center in Four Winds New Buffalo, will remain closed until further notice.

As circumstances allow for us to begin to provide entertainment acts in our Restaurant and Bar facilities, we will do so with appropriate protocols in place to ensure that social distancing is maintained.