

AKWESASNE MOHAWK CASINO RESORT PANDEMIC OPERATING PLAN



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PART I: PANDEMIC MANAGEMENT PLAN

AMCR is following Disaster Management Planning Guidelines (Prevention, Mitigation, Preparedness, Response and Recovery) to ensure the Health and Safety of our Associates and their families, our Guests and the Tribal Community.

AMCR will take into consideration CDC, State and St. Regis Mohawk Tribe (SRMT) Emergency Operations Center (EOC) guidelines. Information on the pandemic and local caseloads can change quickly and AMCR will react to these changes to keep everyone as safe as possible.



A. PREVENTION

The best plan of action is to prevent the spread of COVID-19 from occurring. Since COVID-19 is transmitted from, close personal contact our Prevention goal is to reduce the number of close personal contacts between employees, Guests and the community while maintaining excellent customer service and experience. Since we are in the customer service business, the Coronavirus is new, and unknown Prevention is challenging. While no device or plan is fool proof we have implemented a number of devices and plans to prevent the spread taking into account the customer service aspect; including reduced operating hours, opening areas that are safest to do so first and opening other areas later, installing barriers, and increasing touchless or self-serve capabilities. Initial property wide Orkin Vital Clean disinfecting system and six-foot distance markers throughout property.

B. MITIGATION

If we cannot prevent close personal contact and spread, we will need to mitigate and reduce the effects of these contacts. We have implemented a number of pro-active procedures and measures to reduce the risk of spread of COVID-19 including a phased roll out opening of sections of the Resort, Training of all staff, Posters and Signage for Guests and Team Members, Progressive Discipline to ensure adherence to all policies.

1. Training: All associates will be trained on COVID-19 our 7 Step Safety Plan.

- a. Social Distancing
- b. COVID Sick Plan
- c. Personal Hygiene
- d. Hand Washing/Sanitizing Hourly or between tasks
- e. Cleaning & Disinfecting
- f. Face Masks & PPE
- g. Checklists, policies and audits

2. Health and Safety Mitigation Plan:

- a. **Guest Arrival.** A security officer will greet each visitor to the resort. Visitors will be screened and asked to use hand sanitizer and to wear a mask. Appropriate signage will also be prominently displayed outlining proper mask usage and current physical distancing practices in use throughout the resort.
- b. **Hotel Guest Elevators.** An employee will be present to sanitize the button panels at regular intervals, at least once per hour. Signage will be posted to explain the current procedures. Two guests will be permitted on the elevator due to social distancing. If Guests are from the same household more than 2 may enter.

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3. Cleaning Products and Protocols

- a. **Housekeeping** uses cleaning products and protocols, which meet EPA guidelines and are approved for use and effective against viruses, bacteria and other airborne and blood borne pathogens. We are working with our vendors, distribution partners and suppliers to ensure an uninterrupted supply of these cleaning supplies and the necessary PPE.
- b. **Public Spaces and Communal Areas:** 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, front desk check-in counters, bell desks, elevators and elevator buttons, door handles, public bathrooms, room keys and locks, ATMs, escalator and stair handrails, casino cage counters, gaming machines, gaming tables, gym equipment, dining surfaces and seating area
- c. **Guest Rooms:** Industry leading cleaning and sanitizing protocols are used to clean guest rooms, 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.
- d. **Laundry:** All bed linen and laundry will be changed daily and continue to be washed at a high temperature and in accordance with CDC guidelines². Dirty linen will be bagged in the guest room to eliminate excess contact while being transported to the laundry facility.
- e. **Back of the House:** The frequency of cleaning and sanitizing will also increase in high traffic back of house areas with an emphasis on the employee dining rooms, employee entrances, uniform control rooms, employee restrooms, loading docks, offices, kitchens, security scanning podiums, Employee Relations service desks and training classrooms. C-O
- f. **Shared Equipment:** Shared tools and equipment will be sanitized before, during and after each shift or anytime the equipment is transferred to a new employee. This includes phones, radios, computers and other communication devices, payment terminals, kitchen implements, engineering tools, safety buttons, cleaning equipment, keys, time clocks and all other direct contact items used throughout the resort. The use of shared food and beverage equipment in back of the house office pantries (including shared coffee brewers) will be discontinued.
- g. **Room Recovery Protocol:** In the event of presumptive case of COVID-19 the guest's room will be removed from service and quarantined. The guest room will not be returned to service until case has been confirmed or cleared. In the event of a positive case. Housekeeping will clean the room using standard COVID cleaning procedures and required PPE.
- h. **Air Filter and HVAC Cleaning:** The frequency of air filter replacement and HVAC system cleaning has been increased and fresh air **exchange** will be maximized.

4. AMCR COVID Safety Policy

For additional safety rules and guidelines for employees see AMCR COVID Safety Policy

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C. PREPAREDNESS

1. AMCR will prepare for a possible COVID-19 event by:
 - a. Ordering PPE and necessary supplies
 - b. Utilizing the Communication plan
 - c. Training staff
 - d. Utilizing Audits and Checklists
 - e. Initiating Progressive Discipline when warranted

2. A COVID Safety Response Officer has been appointed to coordinate response to COVID events.

3. A COVID Response Team has been put in place to help manage COVID events and COVID safety.
 - a. **COVID Response Team** handles a COVID events with the assistance and guidance of the CSRO and consists of members from the AMCR operating departments.
 - b. **Contact Tracers** – Are part of the COVID Response Team and perform internal contact tracing with employees. All members have been certified in contact tracing. A minimum of five team members will be certified in Contact Tracing
 - c. **Safety Team** – Includes members of a variety of departments to ensure day to day safety procedures are being followed and to facilitate communication

D. RESPONSE TO A COVID EVENT

1. Employee COVID Event

- a. Initial Screening
 - i. A Security Officer will use a non- touch thermometer to scan all who enter the Resort. Employees will be asked screening questions including questions about COVID symptoms and contact.
 - (a.) Employees utilizing a fever reducing medication to control a fever will NOT be considered symptom free and will be required to answer affirmatively when asked screening questions regarding symptoms.
- b. Secondary Screening
 - i. A scanning device will take a secondary scanning at the employee entrances.
- c. Employees who fail screening

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- i. Security will forward a report to their supervisor with information on the employee. Name, date, badge, reason for the failed screening. The supervisor will forward the report to the employee's supervisor.

d. Employee Reporting

- i. Employees will stay home and call their supervisor and report the following:
 - (a.) They feel sick with one COVID symptom for only one day and scenarios b – h does not apply to them
 - (b.) They feel sick with multiple COVID symptoms and/or for more than one day and/or have worsening symptoms and/or scenarios c – h does apply
 - (c.) They are being tested for COVID-19 -results pending
 - (d.) They have tested positive for COVID-19
 - (e.) They have been in contact with someone who tests positive or who has COVID symptoms
 - (f.) They have been notified to isolate or quarantine by the department of health or government official
 - (g.) They have or will travel outside the designated radius or to NY Travel advisory states
 - (h.) They have or will be in a group larger than the designated group size

e. Supervisor Reporting

- i. Supervisors will email the COVID Response team if items b through h above are reported.

f. Department of Health Reporting

- i. Phone calls from a Department of Health office about employees or guests will be directed to the CSRO or Security Manager on Duty.

g. COVID Response Team

- i. COVID Response Team will contact the supervisor and/or employee with follow up, contact tracing, quarantining time frames and return to work qualifications based on CDC, State and SRMT guidelines.

h. General Manager or Delegate

- i. If an employee tests positive, the General Manager or CSRO will inform the SRMT EOC. The General Manager will send out a memo informing all employees.

2. Guest COVID Event

a. Initial Screening

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- i. A Security Officer will use a non-touch thermometer to scan all who enter the Resort. A scanning device will take a secondary scanning.

b. Secondary Screening

- i. If the visitor refuses the secondary reading, they will be denied entry to the property and provided a COVID-10 information card.

c. Visitors Entering with Elevated Temperature

- i. If the secondary reading confirms that the visitor has a temperature at or above 100.4°F, the visitor will be denied entry** to the property.
- ii. A Security Supervisor will collect basic visitor information including name, names of Guests sharing their room and close contact guests in their traveling party and ID (i.e. driver’s license or employee ID). The Supervisor will then make initial observations for the known symptoms of COVID-19 including cough, fever and shortness of breath (if possible).
- iii. If a visitor refuses to provide information or cooperate with Security, the visitor will be denied entry to the property

d. In House Hotel Guests

- i. A person displaying a cough, shortness of breath or other known symptoms of COVID 19 or a temperature at or above 100.4°F will be discreetly offered a secondary screening.
- ii. If a current hotel guest is deemed to have an elevated temperature, and not in medical distress, the guest should be offered the opportunity to return to their room and gather their belongings before they leave the property.
- iii. **If a guest requests to return to their room:**
 - (a.) Security will be called to escort the guest for the remainder of the process.
 - (b.) The guest will be provided appropriate PPE (if not already wearing) and escorted directly to their room.
 - (c.) Security will control the elevator to ensure no other visitors use the same cabin.
 - (d.) Security will notify Housekeeping and the elevator will be returned to service only after the room has been properly cleaned and sanitized.
 - (e.) Security will notify the Hotel supervisor on duty to pin the room and not permit access until clearance is given and/or the room is properly sanitized.
- iv. **If the guest does not return to their room:**
 - (a.) Security department will notify the Hotel Supervisor on Duty to pin the room and not permit access until it has been cleared and the room is properly sanitized.

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- (b.) The guest’s belongings will remain in the room until security can arrange for the safe removal and storage of the belongings.
- (c.) Hotel Management will determine the best course of action to handle the outstanding folio on a case by case basis
- (d.) *Guests who have previously displayed an elevated temperature may NOT return to the resort until they have been medically cleared.

v. If the Guest with an elevated temperature is sharing the room or has had close contact with other visitors:

- (a.) The Security Supervisor will determine room shares and close contact guests traveling with the elevated temperature guest. The full protocol will be followed beginning with a secondary screening for all close contacts.
- (b.) All close contacts will be asked to leave property until medically cleared.

E. RECOVERY

1. During recovery, the Resort will put into place deep cleaning/sanitizing of all affected areas and move associates around to cover the job duties and tasks left vacant by quarantined Associates.
2. AMCR will seek open and transparent communication with Associates, Guests and the Community.
3. After a COVID-19 event an After Action meeting will convene (using social distancing) to review the plan and response to the COVID-19 event. Recommendations will be brought forth to improve or make changes to the Prevention, Mitigation, Preparation and Response plans.

Part II: AMCR PANDEMIC BUSINESS OPERATING PLANS

A. REDUCED HOURS & REDUCED OPERATIONS

Akwesasne Mohawk Casino Resort opened with reduced hours and reduced operations. Games and amenities will be opened in phases when it is safe and appropriate to do so. Throughout the phases, appropriate back-of-house (BOH) staff will be brought on to support the front-of-house operations (FOH). The Guest Experience is considered throughout the planning.

1. Hours of Operation

AMCR will be open to the public from 9:00 am to 1:00 am until further notice*. During the closed hours, staff will perform the deep cleaning and disinfect often-touched surfaces. *Subject to change without notice based on business needs and local curfews.

2. Occupancy Levels

- a. AMCR will operate at 50% seating capacity or less.
- b. The restaurant venues when open will have occupancy numbers reduced by the social distancing requirement. The lower occupancy will assist in social distancing and reduce the density of guests within smaller areas.

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B. SAFETY

1. **AMCR will follow the COVID-19 Management Plan and the AMCR Safety Policy.**

2. **Face Masks:** Anyone who enters the building is required to wear a face mask.

- a. Masks must be worn covering the both the mouth and nose.
- b. Guests and employees may only remove their masks to eat, drink or smoke in designated areas.
- c. All AMCR associates must follow the mask guidelines in the AMCR Safety Policy.
- d. Face shields can only be worn with a face mask.
- e. Those Associates required to clean or disinfect will wear the proper Personal Protective Equipment (PPE) in accordance to the CDC and to the directions on the cleaning product label.

3. **Social Distancing**

- a. COVID-19 is spread through close contact of people. To lesson close contact AMCR will incorporate Social Distancing throughout the property in accordance to Tribal and/or State guidelines. Guests and employees will use separate entrances and exits. The Slot floor reconfiguration will incorporate appropriate social distancing between players. Table Games will remove seating, limit players and temporarily cease Poker. Restaurants will offer limited occupancy and incorporate social distancing anywhere a line or que may form. The Hotel, when operational will utilize social distancing at the front desk, limit the occupancy of the elevators. Bingo when operating will limit seating and manage ques to enforce social distancing. Ancillary services within the casino will incorporate adequate social distancing by signage, floor stickers, barriers and/or stanchions.
- b. In the back of the house, AMCR associates will incorporate social distancing in the workspace by separating work stations physically or with barriers or by scheduling where possible. Signs and floor stickers will facilitate social distancing in the hallways, the employee break room, the wardrobe and other areas where people may come in close contact with each other.

4. **Non- Smoking:** AMCR opened non-smoking

- a. To reduce the occurrence of mask removal, smoking will not be allowed in the building. Guests may smoke outside in a designated smoking area.
- b. Employees may smoke outside in designated employee smoking areas.

C. REGULATORY

- 1. Prior to reopening, the St. Regis Mohawk Tribal Gaming Commission, the New York State Gaming Commission and the National Indian Gaming Commission did receive proper notification including this plan.

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2. Changes and updates to the plan will be made through normal policy change procedures.

D. PHASE ONE

1. Slots

- a. Reconfiguration of slot gaming floor to allow social distancing between gaming machines. Before opening all equipment was tested to ensure compliance to all regulatory requirements. player tracking system parameters were tested to ensure integrity and proper operation of the system. Gaming machines were removed from the gaming floor both Class III and Class II to ensure social distancing, along with utilizing the Poker Room space for added gaming floor space. Ticket redemption, player point accruals, or coupon expirations, etc. were reviewed to determine if expiration dates apply.
- b. If machines are moved or added to the gaming floor social distancing parameters must be met.

2. Food & Beverage - The Tavern, Sticks Sports Book Grill, Maple Brewing, Floor Beverage Service & Employee Dining Room

- a. These will be the initial food venues to open. Beverages on the gaming floor will be through beverage servers and service bars only, self-serve beverage stations will closed. All public bars will be closed and will reopen upon approval of Saint Regis Mohawk Tribe.
- b. **Tavern and Sticks Sports Book & Grill** food venue reduced occupancy by engineered social distancing. Using single use menu, plates, flatware, napkins and condiments. Hours of operation will be 11:00 am to 10 pm daily extended hours for weekends. Assisted daily curbside meal delivery may be added. Hours subject to change with State and Tribal Guidelines.
- c. **The Employee Dining Room** occupancy engineered social distancing. Single use plates, cups, utensils and condiments. Self-service salad bar eliminated. On occasion food is provided to employees it will be done in a manner to maintain social distancing and it will be served in single serve containers. Employees may use the buffet as dining space to allow for social distancing.
- d. **Maple Brewing** will have no interruptions. Floor service bar will have no interruptions; associates will wear masks; gloves are optional as they will be handling cash.
- e. **Service Bar 1 & 2** will be open for beverage service maintaining proper social distancing.
- f. **Alcohol service** will be determined by state liquor rules and SRMT EOC rules.

3. Marketing

- a. Marketing promotions and events will be designed to operate without creating bunching or grouping of Guests.
- a. Concerts and events that cannot be re-designed for social distancing will be cancelled.

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- b. Give-a-ways or other promotions that lead to queuing will be have social distancing signs and queuing markings clearly visible.
- c. Touch points will be reduced where possible and sanitizer for use between guest interactions will be provided if reduction of touch points cannot be achieved.

4. Security

- a. Security will conduct non-touch temperature checks on everyone coming into the facility. Security will conduct non-touch temperature checks on all associates coming into work. The front entrance will provide entry for guests, along with a secondary site for guests that may have a high temperature.

E. PHASE TWO - WILL START AFTER PHASE ONE HAS BEEN EVALUATED. THIS EVALUATION INCLUDES CASE NUMBERS.

1. Food & Beverage - Maple Steak & Ale/Bingo Grab-n-Go

- a. **Maple Steak & Ale** menu will be added to the Tavern menu. Reduced occupancy a result of engineered social distancing floor plan. Utensil handling, menu, condiments and table disinfecting procedures maximize diner’s protection. Assisted daily curbside meal delivery is a possibility.
- b. **Grab-n-Go:** Grab –n-Go will be evaluated with the consideration of business levels prior to opening. Occupancy will be set by engineered social distancing. Minimal menu, no self-serve items. Single use utensils and condiments.

2. Gift Shop

- a. Limited days and limited hours initially. 50% occupancy. Floor marking to reinforce social distancing. Clear barrier added at cashier counter. No returns.

F. PHASE THREE - WILL START AFTER PHASE ONE & TWO HAVE BEEN EVALUATED. THIS EVALUATION INCLUDES CASE NUMBERS.

1. Table Games

- a. Table games will open and occupancy set by engineered social distancing. Plexiglas is installed in between each seat to separate the players and dealers. There is a 3 chair maximum per table on Blackjack and novelty games. TG Personnel will perform disinfecting after each player leaves, including often touched surfaces when dealer changes occur. Dealers will verbally tap into games. Chips in the bank will be disinfected during closed hours. Dealers at games without barriers are required to wear a face shield and cloth face mask.
- b. Hand sanitizer will be provided for guests to use while playing at the table game. Guests will be reminded of proper mask usage and to utilize the hand sanitizer before beginning to play.

2. Hotel

The Hotel will open with 50 rooms initially. Elevators will have maximum occupancy of two (2). Hotel

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housekeeping will disinfect rooms utilizing new protocols to minimize risk to associates and maximize safety to guests. Removal of: Coffee Makers and condiments; Directory book; extra pillows and blankets; clothes hangers; Pens and paper from all rooms. Housekeeping will only enter a room 24 hours after a guest has left to disinfect. A disinfected room will remain vacant a minimum of 24 hours. Upon evaluation the Hotel may open more rooms.

3. Cedars Coffee

Cedars has been moved to the Tavern. Cedars will have a separate entrance from the Tavern with social distancing in place.

G. PHASE FOUR - WILL START AFTER PHASE ONE, TWO & THREE HAVE BEEN EVALUATED. THIS EVALUATION INCLUDES CASE NUMBERS. EACH PART OF PHASE FOUR WILL BE EVALUATED INDEPENDENTLY

1. Valet/Coat Check

a. Valet services may return in this phase with hand sanitizing after every touched vehicle. Coat check can use plastic bags to cover each coat.

2. Native Harvest Buffet

a. The Buffet will reopen with limited hours and a re-design that will separate the guest from the food. Guest service will be cafeteria style or a limited/fixed menu. Utensils and condiments will be single use. May require a remodel to maximize associate and guest safety.

3. Cascades & Bars

a. Cascades bar will open with alternating bar slots turned off and chairs removed. The Tavern will open the same way. Plastic cups utilized in all bars.

4. Bingo

a. When it is safe to open Bingo:

- i. Bingo operations will commence on a Monday, Wednesday and Thursday schedule only. Online and telephone reservations through our Hold My Ticket software will minimize guest contact and provide occupancy management. Assigned seating will utilize the engineered social distancing floor plan. Associates and guests will be required to wear facial coverings. Extended bingo sessions with two (2) 30-minute breaks to offer buy in opportunities. Prices and payouts will reflect the new maximum occupancy levels.

5. Sweetgrass Spa and Hotel Pool/Fitness Room

a. The Spa, Pool and fitness room's reopening will be evaluated based on current guidelines and case numbers.

6. Sticks Sports Book (Wagering Venue)

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- a. When it is feasible to open the Sports Book, Kiosks will be turned with proper queuing to incorporate social distancing and provide sanitizing wipes for use between users. Winning tickets paid through the Cage/Winners Club.

7. Banquets closed indefinitely

8. Bussing closed until further notice

9. Concerts in the Mohawk Bingo Palace canceled until further notice