

Employee Gaming Policy Effective July 23, 2020

Oneida Indian Nation employees are welcome to wager at the Nation's gaming facilities during off-duty hours, with a few important rules to ensure appropriate internal controls.

Loyalty Programs & Promotions

All employees 18 years and older are required to use their own TS Rewards loyalty cards when wagering. Employees are not permitted to participate in casino promotions, drawings, tournaments or giveaways. This includes promotional events in Bingo, Poker, Slots, Keno, Table Games, and Sports Book. Employees who achieve casino VIP status are permitted to participate in private events and dinners, but cannot participate in giveaways or drawings that may be a component of these VIP events.

Sports Book Wagering

Nation employees who are 18 years of age and older may wager at any of the Nation's Sports Book locations with the following exclusions:

- Employees, and any supervisors of such employees, who work in the Sports Book Department at Turning Stone Resort & Casino, YBR Casino & Sports Book or Point Place Casino
- Employees in the Information Technology Department who have physical or remote electronic access or responsibility for Sports betting systems
- Oneida Indian Nation Gaming Commission Employees
- In-house attorneys who represent the Nation
- Executive Management

In addition to these exclusions, all eligible employees must follow these additional guidelines for Sports Book Wagering:

- Employees must have and always use their own employee TS Rewards Card, which includes an employee designation, when placing Sports Book wagers; anonymous play is not allowed. Failure to use your employee TS Rewards Card may result in your ineligibility to collect winnings. Lost TS Rewards Cards must be reported to the TS Rewards Desk.
- Employees who receive cash payouts at a casino cage or at the Sports Book betting desk, must identify themselves as employees at the time of payment. When paying an employee, a Cage Supervisor or Sports Book Manager or Supervisor on duty is required to oversee the transaction.
- Employee Sports Book wagering activity will be audited periodically for any irregularities.

Slot Machines

All Nation employees 18 years and older may play Slot Machines at Turning Stone Resort & Casino, YBR Casino & Sports Book, and Point Place Casino with the following exclusions:

- Employees who work in the Turning Stone Resort & Casino, YBR Casino & Sports Book, or Point Place Casino Slot Departments
- The Director, Manager, Player Services Shift Managers, Host Managers, Executive Hosts and Casino Hosts in the Player Development Department
- Oneida Indian Nation Gaming Commission Employees
- Employees in the Information Technology Department who have physical or remote electronic access to Slot Machines
- All Executive Management

All Nation employees 18 years and older may play Slot Machines at SavOn or PlayOn, with the following exclusions:

- SavOn, PlayOn or Maple Leaf Market employees who hold a gaming license
- Oneida Indian Nation Gaming Commission employees
- Employees in the Information Technology Department who have physical or remote electronic access to Slot Machines
- All Executive Management

All Nation employees 18 years and older may play Slot Machines at The Lake House with the following exclusions:

- Slot Employees assigned to work at The Lake House
- Oneida Indian Nation Gaming Commission employees
- Employees in the Information Technology Department who have physical or remote electronic access to Slot Machines
- All Executive Management

Slot Vouchers

While employees who are allowed to play slot machines will obviously handle slot vouchers when they are at the casinos and other gaming facilities as a guest, employees are prohibited from accepting vouchers as tips, tokes or as payment for goods or services in the course of their work assignments. Should a guest leave a voucher, employees should contact a supervisor immediately. All vouchers received or found at a casino must be turned in to Security at the Casino Base office on the gaming floor. All vouchers received or found at SavOn, PlayOn, or The Lake House must be turned in to the Manager on Duty who will place the vouchers in a secured Lost & Found Box.

In addition to these exclusions, all employees must follow some simple guidelines for playing Slot Machines:

- Employees must have and always use their own employee TS Rewards Card, which includes an employee designation, when playing Slot Machines; anonymous cash play is not allowed. Failure to use your employee TS Rewards Card may result in your ineligibility to collect winnings. Lost TS Rewards Cards must be reported to the TS Rewards Desk.
- Employees who receive cash payouts at a casino cage, from a Slot Services
 Representative, or a SavOn/PlayOn Gaming Cashier, must identify themselves as
 employees at the time of payment. When paying an employee, a casino Cage
 Supervisor or SavOn/PlayOn Manager on duty is required to oversee the
 transaction.
- Employee gaming activity, comps, Free Play and other records will be audited periodically for any irregularities.

Table Games and Keno

Employees assigned to work at the Turning Stone Resort & Casino (including golf and hotel facilities), YBR Casino & Sports Book and Point Place Casino are prohibited from playing Table Games and Keno at any location. All other employees 18 years and older may enjoy these games.

Poker

All employees 18 years and older may play Poker except Oneida Indian Nation Gaming Commission employees. Employees of the Poker Department may only play Poker at tables designated for Poker employees.

Bingo

All employees 18 years and older may play Bingo except Oneida Indian Nation Gaming Commission employees, and Turning Stone Bingo employees.

Pull Tabs

All employees 18 years and older may play Pull Tabs at Turning Stone Resort & Casino, with the following exclusions:

- Oneida Indian Nation Gaming Commission employees
- Turning Stone Bingo employees
- All Executive Management

All employees 18 years and older may play Pull Tabs at SavOn or PlayOn, with the following exclusions:

- Oneida Indian Nation Gaming Commission employees
- SavOn, PlayOn and Maple Leaf Market employees who hold a gaming license
- All Executive Management

Code of Conduct for Employee Gaming and Sports Wagering

Employees may only participate in gaming activity during their non-working hours and, as employees, are held to the highest standards of behavior while on Nation properties. All policies, procedures and standards of behavior apply while employees are on property. Additionally, the following minimum standards apply to employee gaming:

- 1. License/I.D. badges, uniforms and other articles which would identify players as employees may not be worn at any time while playing or while visiting as a guest.
- 2. While license/I.D. badges should not be worn while playing, they should be carried by the employee while on property and produced upon request.
- 3. As always, employees who work at a casino property should advise their manager or supervisor in advance if they intend to be on property during off-duty hours.
- 4. Eligible employees may play before or after work and on unscheduled days, but are never allowed to play while clocked-in, while on break, or during scheduled work periods. Additionally, employees may not play (or be on the work premises) during any unauthorized absence from a scheduled shift or while on leave of absence or administrative or disciplinary suspension.
- 5. Employee gaming activity may in no way affect or interfere with employees' attendance at work or their job performance.
- 6. As players, employees should neither expect, nor are they entitled to, any favorable treatment or extra privileges. All employees must avoid any behavior which conveys a conflict of interest with our guests or relating to a business decision.
- 7. Employees are expected to display the highest standards of respect, courtesy and professionalism to guests, co-workers and Nation property while visiting and playing. Employees should avoid displacing guest business during peak periods. Employees may not get in any line to place a wager if more than 3 guests are already in line or if more than 3 guests arrive in the line behind the employee.
- 8. Employees must be playing while in gaming areas. They may not loiter in any guest area or at a machine. They may not interfere or distract on-duty employees for non-business reasons.
- 9. Employees may not be present in the Turning Stone Resort & Casino employee cafeteria, YBR Casino & Sports Book employee dining room, Point Place Casino employee dining room, or any other break rooms or back-of-the-house areas of Nation operations when not scheduled to work, and may not partake of any activities or perks that are intended for on-duty employees.
- 10. Employee's misuse of the TS Rewards point system for the purposes of personal advantage is prohibited.
- 11. Management may deny or suspend gaming privileges for any employee at any time for any or no reason and may update this policy at any time with or without notice.