

Exhibit X.B.2

AFFIRMATIVE ACTION PLAN

(Amended per NYSGLB Memo Dated May 12, 2014)

The Gaming Facility Location Board recognizes the importance placed upon minority and women-owned business enterprises (MWBE) business participation by the State and adopts a policy to encourage contract opportunities for all small businesses including State certified MWBEs. A successful RFA proposal will include a meaningful opportunity for state certified MWBE businesses to participate in the development, construction and operation of the gaming industry.

Meaningful participation includes significant opportunity by certified MWBE small businesses through inclusion of specific, measurable commitments for vendor and supplier participation and development of a MWBE small business-monitoring program.

Submit as Exhibit X. B.2. how the Applicant and, as applicable, the Manager proposes to establish and implement an affirmative action program that identifies specific goals for the engagement of minorities, women, persons with disabilities and veterans on construction jobs and service and professional jobs during operation, in order to increase the diversity of the gaming industry workforce.

Affirmative Action Plan

Nevele Resort, Casino & Spa fully supports the NYSGLB's goals for ensuring that the economic benefits of this project are spread as broadly as possible throughout the host community, surrounding communities, the region and the state to reflect the diversity of these areas. In furtherance thereof, we are committed to complying with all state and federal fair employment practice laws, as well as maintaining a workforce that reflects the diversity of the surrounding community. Nevele believes in and supports equal opportunity employment to all persons regardless of race, creed, color, age, national origin, alienage or citizenship status, gender (including gender identity and sexual harassment), sexual orientation, disability (including pregnancy), marital status and partnership status, arrest or conviction record, status as a victim of domestic violence, stalking and sexual offenses and unemployment status.

As is evidenced by the Affirmative Action Program of Equal Employment Opportunity on the following pages, Nevele Resort, Casino & Spa is fully committed to equal employment. In addition to equal employment opportunity, we are also fully committed to providing NYS certified MWBE, persons with disabilities and veterans with opportunities in the development, construction and operation of the Gaming Facility.

Nevele recognizes the important role that NYS certified MWBE, persons with disabilities and veterans play in the community, the economy and to Nevele Resort, Casino & Spa. We are committed to pursuing business relationships with such enterprises and will strive to continually improve business opportunities. This commitment is not charitable; the relationships we seek must be able to provide value to both Nevele Resort, Casino & Spa and to the various certified MWBEs, to disabled persons and to veterans. It is with this commitment that Nevele pledges a policy similar to that of the State of New York. As such, as it relates to NYS certified MWBE, persons with disabilities and veterans entities, Nevele will:

- Actively and affirmatively solicit bids for contracts and subcontracts from these entities.
- Request a list of such entities and agencies from the State of New York.
- Ensure that plans, specifications, request for proposals and other documents used to secure bids will be made available in sufficient time for review by prospective entities.
- When feasible, divide the work into smaller portions to enhance participation by these entities and encourage the formation of joint ventures and other partnerships amongst these entities to enhance their participation.
- Document and maintain records of bid solicitation, including those from these entities, and the results thereof.

Summary of Supporting Documentation

To fully respond to this Exhibit, we have included a copy of the attached documents:

- Affirmative Action Plan (Operations)
- Affirmative Action Outline including MBE, WBE Records on Past Projects (Construction)
- Agreement between Nevele Investors, LLC & STRIVE International