

HUMAN RESOURCES PRACTICES

EXHIBIT X. B.1

Sterling Forest Resort will establish a Human Resources Department that is staffed with an experienced and fully competent Human Resources team—designed to support the recruitment, development, engagement, and management of a workforce from the local community and region.

The Genting Group has proven experience developing a skilled, motivated, and diverse workforce capable of upward mobility in various disciplines of work, as evidenced in part by its being rated No. 1 in Malaysia and No. 2 in Asia for Overall Best Managed Company for the Decade by *Asiamoney*.

The workforce at Sterling Forest Resort will be given similar career development opportunities that have proved successful at the Genting Group's other locations including extensive experience in gaming and hospitality, along with opportunities to develop skills in other disciplines, such as finance, transportation, security, and sales and marketing.

To support the human capital needs of the organization, the Human Resource Department will have as its goals:

- To hire and provide employment opportunities to local and host communities
- To recruit, select, and maintain a diverse workforce
- To train, develop, and mentor employees with a focus on upward mobility and personal growth
- To ensure the workforce receives competitive wages and benefits package to provide for the financial security and well-being of employees and their families
- To promote a sense of camaraderie and team atmosphere
- To provide outstanding internal and external customer service in a motivating environment
- To become a community partner by establishing positive relationships among a diverse set of organizations in the community
- To work tirelessly to become the employer of choice in the community

Sterling Forest Resort plans to follow similar practices employed at the New York City and Miami locations by assembling an experienced and diverse management team to ensure a successful and on-time opening. In addition to the access the Genting Group has to extraordinary human capital from around the globe with extensive experience in all areas of gaming, entertainment, hospitality, and resort operations management, there are plans to identify additional experienced local managers and supervisors capable of training the local population in a multitude of employment opportunities that the opening of the facility will create.

The Employment Program will be designed to identify the most qualified candidates for every available position and will focus on local and regional candidates. Our Human Resources operation will deploy our recruitment and employment program and partner with various community agencies and schools to identify candidates who have an interest in working at the Sterling Forest Resort facility. Local and distressed communities will be a focus of the Company's recruitment efforts.

Career Centers:

Sterling forest will launch an employment program anchored by Sterling Forest Resort Career Centers strategically located throughout Sullivan, Ulster, and Orange counties. The Career Centers will be located in underserved communities in the region with the specific mission and purpose of providing access, information, education, and training to the potential future employees of the Sterling Forest Resort. Career Centers will have the specific mission of serving those that are unemployed or underemployed and will implement goals established for the hiring of minority and veteran communities.

Career Centers are currently planned for the Port Jervis and Newburgh communities with additional centers available for communities in Ulster and Sullivan counties. These communities are selected based on analysis of employment demographics in the area. Presented in figure #1 below is a

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summary of data collected for a sample of potentially underserved communities in the area. Note that the communities are selected based on demographic criteria as presented below; average household income less than \$40,000 per year versus the national average of \$51,400; 15% or more of residents are below the poverty level; 30% or more are without health insurance; unemployment rates are 8.5% or greater, compared to a national average of 5.9%.

Sterling Forest Resort Career Centers will provide information to prospective employees. It will serve as an anchor for recruiting and outreach practices in the local community. Prior to opening these Centers will not only serve as a place for people to apply for and learn more about potential careers with Sterling Forest Resorts, they will also serve as training facilities where schools for the various service trades and skills will be convened. Candidates will be interviewed and could find themselves selected for dealer school where weeks of technical training will be provided free of cost to the candidate, and the reward for successful completion of the school is a high paying and exciting career in a casino environment.

Figure #1: Underserved Community Statistics

Target Cities for Workforce Development						
Cities/Towns resort site	Distance to Site (Miles)	Household Income	Unemp. Rate	Below Poverty Lvl	% w/o Health Cvg.	
Ellenville Village	45	42,600	8.5%	17.2%	17.6%	
Monticello	47	22,897	14.9%	31.1%	33.8%	
Newburgh	30	36,077	8.7%	25.7%	42.9%	
Port Jervis City	35	37,604	12.0%	14.7%	29.3%	
South Fallsburg	48	38,919	8.5%	19.1%	43.6%	
New York State	n/a	56,448	5.9%	12.2%	10.9%	
United States	n/a	51,371	5.9%	11.8%	14.8%	

Recruitment and Employment

This recruitment and employment program will identify targeted local, regional, and minority hiring goals and will leverage the following sources for employment candidates:

- New York State Department of Labor Career Centers
- Hudson Valley local career centers
- College campus recruitment events including:
 - Rockland Community College
 - Westchester Community College
 - Dutchess Community College
 - Ulster County Community College
 - Sullivan County Community College
- Workforce Development Education Program, SUNY – Orange
- Orange County Employment & Training Administration
- Orange County Veterans Administration Office
- Veterans Opportunity to Work Program (VOW) and other local veterans-to-work Programs
- Table games and slot training schools
- Management, supervisory, and front-line job fairs and hiring events (company sponsored)
- Orange County job fairs sponsored by the Department of Labor

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- Orange County Workforce Development System
- Social media outlets, targeted to Orange County and the Mid-Hudson Region
- Sterling Forest Resort's on-site Employment Center, opening six months prior to facility opening.

Responding to workforce needs will require collaboration between many of the workforce development partners and community colleges. With the intent to create new career opportunities for the region's residents that provide for personal growth and advancement, it is envisioned that our Career Program will be developed among local partners and community colleges to address the workforce needs.

The program will include:

- Collaborative development of training and certification programs for the region's workforce
- Career Path Planning for both the underemployed and unemployed, and others who wish to enter the gaming and hospitality industry
- Marketing of these programs to the region's residents, with targeted efforts to reach those who are unreachable through traditional avenues
- Communication of the inventory of available positions, which include the bona fide occupational requirements and starting wages.
- Recruitment, screening, assessment, and job placement processes which promote a diverse workforce

Once candidates are selected and hired, they will begin a regiment of on-boarding, training, and development programs to prepare them for success. The initial training programs at the time of the opening of the facility will include:

- Company orientation
- On-boarding program including an overview of the company, the Sterling Forest Resort facility, employee expectations, rules and regulations, anti-harassment in the workplace standards, and responsible gaming
- Customer service training
- Technical training, based on position assignments
- Supervisory and management orientation

As part of Sterling Forest Resort's commitment to providing its employees with the skills, knowledge, and support to provide world-class guest service, the company also is committed to being a responsible vendor of alcohol and to ensure the enjoyment and safety of our guests and employees. A program entitled Training Intervention Procedures (TIPS) will provide employees with the tools and knowledge needed to support our commitment to serving alcohol responsibly.

TIPS is a four-hour certification (three-hour course plus one-hour exam) given to new hires who will be serving or touching alcohol in some way (security officers, security supervisors, security managers and security director, waiters/waitresses, cocktail servers, bartenders, bar backs, and food and beverage supervisors, managers, and directors). This certification is for three years.

The TIPS goal is to establish acceptable standards of practice for serving alcoholic beverages and includes:

- Encouraging servers to create the kind of environment that promotes safety and responsibility wherever alcohol is served.
- Influencing skills of servers and bartenders so that they learn to respond flexibly and courteously to the safety and well-being of others.
- Incorporating skills and expertise in a positive, meaningful, and profitable way to influence guests' drinking behavior.
- Helping servers learn many "right ways" to intervene in given situations.

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Service Intervention Procedures (SIPS) is a one-hour refresher course given every six months for team members who do not serve alcohol but may interact with guests who have been drinking (dealers, slot attendants, cage cashiers, sports book personnel, bussers, surveillance, etc.).

Both TIPS and SIPS cover the following topics:

- How Alcohol Affects Our Guests
- The Signs of Intoxication: The 4 Behavioral Cues
- Intoxication Rate Factors
- Blood Alcohol Content (BAC)
- Guest Responsibility
- Server Responsibility
- Reasonable Efforts
- Understanding Liability- Dram Shop Liability and Negligence Laws
- Checking IDs
- Documentation of an Incident
- Vignettes (TIPS only) - Rating examples of intoxication and responses by team members

These programs are standard protocol at company properties in New York City and Miami, and the same will be true at the Sterling Forest Resort facility.

As part of Sterling Forest Resort's commitment to employees, the company has and continues to maintain a hiring-from-within policy, which affords promotional opportunities for those employees who desire to enrich their careers by growing their skills and assuming additional responsibilities. In the short time since the opening of Resorts World Casino New York City, the property has promoted 172 employees, or 12 percent of the workforce from within.

The company's comprehensive ongoing program of training and employee development is a fundamental component of its ability to ensure a successful opening and ongoing operations. Sterling Forest Resort will be staffed with an on-site training department. Training programs in all areas of the operations will focus on development of customer service delivery skills, technical training in specific disciplines, and management development programs. The outcome of the training programs will be a more educated workforce capable of producing enhanced levels of service to customers and enhanced personal growth for employees. At the Genting Group, training has and continues to be a way of life, with a continuing program of training and development offerings that provide employees with the skills necessary to succeed and become upwardly mobile.

Training programs in the following disciplines will be offered: customer service delivery, supervisory and management development, food and beverage, slot operations, security, surveillance, finance, marketing, and administrative operations. These training programs, offered at the Genting Group's existing facilities, will be replicated at the Sterling Forest Resort facility and tailored to the local population. These programs will provide the fundamental platform for employees to deliver high levels of customer service in an outstanding entertainment facility, where customers feel secure and delighted by the levels of service.

In establishing transparent career paths with measurable criteria, Sterling Forest Resort plans to establish ongoing career-based educational opportunities including a Career Path Counseling function designed to educate, train, and provide the skills necessary for advancement to positions with greater responsibility and corresponding higher levels of compensation.

In most cases, employees can gain departmental experience and demonstrate the necessary skills for the next supervisory/management level of experience within two to three years. With strong support from management, and the individuals' desires for advancement, frontline employees will see these opportunities become reality. Sterling Forest Resort also will use the latest techniques in instructional design to provide the Human Resources Training programs necessary to accomplish this goal. Among the core programs available, the following learning outcome based offerings will be offered:

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- Anti-Harassment and Discrimination in the Workplace
- Interviewing, Coaching, Teambuilding and Diversity Skills
- Customer Service Skills
- Policies and Procedures
- Responsible Gambling
- Employee and Labor Relations
- Leadership Skills
- Stepping up to Management
- Managing Legal Liability in the Workplace
- Finance for the Non-Financial Manager

Customer Service Program

Sterling Forest Resort plans to provide a Customer Service Training program designed and facilitated by 3rd party service experts. These programs are teach the skill sets and behaviors necessary to surprise and delight guests, develop a “customers first” philosophy by making memorable experiences at the property, and inspire guests to return for additional visits.

The training program will provide employees with the necessary tools to create legendary and memorable customer experiences. Employees receive customer service and sales skill training designed to help employees more consistently surprise, delight, and “wow” customers.

The program includes five key components:

1. Assessment of skills
2. Training and development based on assessment of existing skill level
3. Experiential learning and feedback
4. Reinforcement though employee messaging, coaching, and additional training
5. Management tools: mystery shopping by the same company providing this training to ensure alignment of training, learning, and measurement. The feedback is cycled back to the employee for additional learning and development.

Supervisors and managers also participate in the training and are responsible for driving performance. They will coach, motivate, and provide effective feedback to employees to ensure employees have every opportunity to be successful.

A key to the company’s ability to sustain their position in the marketplace as an employer of choice is to ensure that there is a comprehensive succession plan in place. The company will provide annual performance evaluations to all employees, and as part of that process, employees are provided with the opportunity to discuss their career plans with their department management. From there, the company will build a succession planning process to position employees on a trajectory for their next position by ensuring they receive development and mentoring opportunities in their incumbent positions while preparing for their next roles.

Recognizing that today’s society is made up of working parents, Sterling Forest Resort will establish an on-site day-care program for families who work at the Sterling Forest Resort facility. The day-care program will provide an experience where children learn in a caring environment through a carefully developed and designed curriculum that is developmentally, culturally, and individually appropriate.

The day-care center will be operated by a nationally recognized and accredited day-care provider to ensure the best-in-class operations for Orange County families. Accreditation through the National Association for the Education of Young Children (NAEYC) requires that a child care program meets a variety of strict criteria including having a well-trained faculty, good staff-child ratios and group sizes, a

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comprehensive curriculum, and stringent health and safety standards. The program will provide meaningful opportunities for family involvement and inclusion.

We expect the Day-Care Center to operate between the hours of 7:00 a.m. to 6:00 p.m., Monday to Friday, and serve infants (from six weeks old) through five years old, as well as include consideration for after-school programs.

The day-care provider will conduct a comprehensive background check on all prospective employees and frequent visitors. The background check will consist of a county criminal record check for the past seven years performed in all counties that a person has lived, worked, or attended school. In addition to the county criminal search, a sex offender search, OFAC search, and a social security verification trace also will be conducted. In addition, the day-care center will be compliant with New York State Office of Children and Family Services' strict regulations for licensure and for registration of the day-care center and its employees.

In addition to providing competitive wages, training, development, and mentoring programs to assist employees in developing their career paths, Sterling Forest Resort will offer a comprehensive benefits package to employees, as it does at our New York City and Miami locations. Those benefits include low-cost medical and dental coverage through a nationally recognized provider, and at no cost to the employee, Life Insurance and Long-Term and Short-Term Disability Insurance.

Included in the medical plan is coverage for preventative care, a prescription plan, and mental health and substance abuse disorder services.

The Employee Assistance Program will provide an additional layer of services to Sterling Forest Resort employees for any problem requiring counseling including:

- Counseling services
- Financial and legal advice
- Family support
- Relationship assistance, coping and depression support

This program includes a toll-free phone line offering personal and confidential assistance 24 hours a day, seven days a week. Employees also can gain access to this information online.

Sterling Forest Resort will strive to understand problem gambling and to assist and guide those individuals who have or may have a problem. Sterling Forest Resort also has a strict policy against underage gambling, and it is each employee's responsibility to enforce this policy.

All employees will participate in Responsible Gaming training; the training educates employees on how to recognize problem gaming and gives them the tools and referral resources to assist those patrons who may have a problem. The company subscribes to the National Council on Responsible Gaming (NCRG) and uses NCRG resources in providing training to employees.

Through new hire orientation, back-of-house signage, and ongoing reinforcement activities, the company takes proactive steps to address compulsive gambling and underage gambling, which can negatively affect both guests and employees and interfere with business operations.

The company realizes employees are not treatment professionals, yet they can identify and discreetly intervene with players who may have a compulsive gambling problem by contacting a supervisor, manager, or casino host.

As part of the company's ongoing training and development efforts, both at the time of on-boarding and on an annual basis, all employees participate in a Responsible Gaming program.

Underage Gamblers

Individuals under the age of 18 are prohibited from gambling. It is the responsibility of all employees on the casino floor to identify underage gamblers, and is not limited to our security personnel. Employees are expected to check a guest's ID or notify security immediately if it is suspected that a guest is not old enough to gamble. All employees receive pre-employment and annual training that specifically sets

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forth our policy and trains all employees on the procedures to identify, prevent, and address the risks of underage gaming.

Responsible Gaming

Training will be provided to all employees regarding on our Responsible Gaming Program, as is further described in detail in Exhibit X.A.1 through Exhibit X.A.6. This training is provided annually to all employees and is one of the most robust and innovative programs designed and implemented in North America.

Title 31

Training will be provided to gaming employees prior to employment and on a recurring basis as part of a comprehensive Title 31 Compliance program. The Title 31 compliance program is described in greater detail under Exhibit VIII.D.1. Our focus will on Title 31 compliance will be a key objective of our VIP services training for those employees most likely to be exposed to or engaged with customers handling large monetary transactions. This training will integrate expectations for exceptional service delivery alongside the paramount need for compliance.