

GATEWAY CASINOS & ENTERTAINMENT LIMITED

Health & Safety Re-opening Plan



January 28, 2022



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Message from the CEO

As we prepare for the re-opening of our properties, I'm writing to share with you some information on the new Health & Safety (H&S) standards that will be in place on your next visit to a Gateway casino. I know it has been a difficult time but in recent days, we have seen provincial governments allow for the re-opening of many parts of the economy.

We are working diligently to ensure we are prepared to welcome you back. The Gateway team has been collaborating with our gaming regulators and provincial health officials to ensure we have rigorous cleaning and sanitation and safe-distancing measures in place, and have work procedures, practices and equipment appropriate for our industry.

With the health and wellbeing of our patrons, employees and communities as our top priority we have developed H&S standards at our facilities to provide maximum protection for our employees and guests. This detailed plan establishes standards for all areas of our business and these standards will continue to evolve based upon the best-practices and recommendations from health authorities such as the British Columbia Centre for Disease Control (BCCDC), Public Health Ontario and Health Canada, along with industry resources, gaming regulators and safety associations. These best-practices and recommendations may change from time to time as new information comes forward.

Though we must continue to be safe and responsible, we can also begin to come together and participate in the activities and entertainment we enjoy. Your visit may be a bit different but we are working hard to make sure it is as fun, but safe, as possible.

On behalf of everyone at your favourite Gateway casino, we look forward to seeing you soon.

Tony Santo

CEO

Gateway Casinos & Entertainment Limited

COVID-19 Health & Safety Guidance

In addition to specific direction from health authorities and H&S regulators such as WorkSafe BC, WCB AB and Ministry of Labour (Ontario), Gateway must follow direction provided from provincial gaming crown corporations and provincial gaming Regulators.

For instance, but not limited to, the Alcohol and Gaming Commission of Ontario (AGCO) has developed and implemented a new Standard (1.2.1) relating to COVID-19.

To assist Operators, the Canadian Gaming Association (CGA) has published health & safety guidelines for the Ontario casino and charitable gaming sectors.

All re-opening tasks and subsequent gaming activities follow all health and safety requirements of this document until advised to the contrary by government health authorities.

This COVID-19 pandemic plan is in addition to Gateway's existing health and safety standards, procedures and practices.

This plan has been reviewed and assessed by an independent third party.

Gateway has developed Health & Safety (H&S) standards at our facilities to provide maximum protection for our employees and guests. This detailed plan includes H&S measures to protect employees and customers. We have established standards for all areas of our business and these standards will continue to evolve based upon the best-practices and recommendations from health authorities such as the British Columbia Centre for Disease Control (BCCDC), Public Health Ontario and Health Canada, along with industry resources, gaming regulators and safety associations. These best-practices and recommendations may change from time to time as new information comes forward.

This plan was developed in accordance with guidance and recommendations from provincial and local health authorities, applicable across the broader community and industries. Gateway will continue to revise this document with updated health and safety guidelines as and when received to ensure all reasonable efforts are made to provide a safe and enjoyable experience for our guests and employees.

The risk mitigation steps outlined in this document are designed to have no material impact on other laws and regulations casino operators must adhere to, including but not limited to, responsible gaming, anti-money laundering, security and surveillance monitoring and financial reporting.

Communication

The details of this plan, including applicable appendices, is communicated with employees in a manner commensurate with their role. Gateway Casinos uses existing guest communication protocols (e.g. website, signage, email, etc.) to advise guests of changes to casino operations relating to COVID-19.

Legal Disclaimer

This Plan is subject to review and revision to address changes in circumstances associated with COVID-19, and to ensure compliance with applicable public health and workplace safety rules and obligations. In the event of a conflict between this Plan and a legal obligation, the plan is deemed to be amended as legally required.

Training

Employees are trained on the contents of this plan in a manner consistent with their role and duties. Training is completed prior to the beginning of an employee's first shift.

1 Assessment of Risks

The COVID-19 virus is spread by the respiratory droplets an infected person produces when they breathe, cough, sneeze, talk, or sing. Respiratory Infections such as influenza & COVID-19 are mainly spread by liquid droplets that come out of the mouth. Droplets come in both small and large sizes. Larger droplets are heavier and usually only travel up to 2 m; smaller droplets can easily spread in enclosed spaces without adequate airflow and where many people are sharing the same space.

Close Contact: A close contact is generally someone who has been near a person with COVID-19 for at least 15 minutes when health and safety measures were not in place or were insufficient. This includes up to two days before someone develops symptoms.

Surface Contact: COVID-19 can survive on surfaces for hours or days yet, based on analysis, infection from contact with contaminated surfaces seems to be rare.

Areas throughout GWC have been identified where there may be risks, either through close physical proximity or through contaminated surfaces. The closer workers are and the longer they are close to each other, the greater the risk.

We have involved our front-line employees, managers, and our joint health and safety committee.

We have identified areas where people gather and identified tasks and processes where workers are close to one another or members of the public. We have identified the tools, technology, and equipment that workers share while working and identified surfaces that people touch often, such as doorknobs, dials, light switches, slot machines and ATMs.

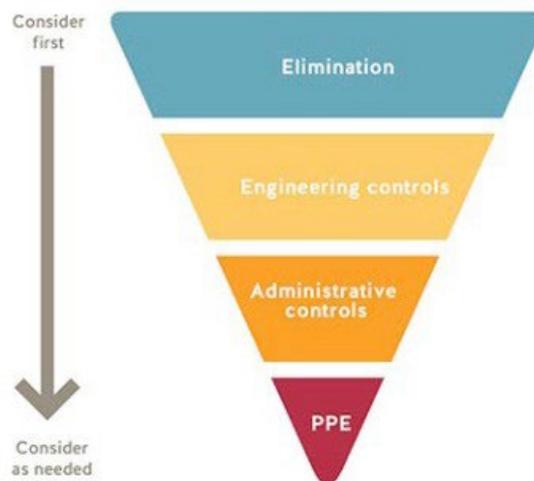
2 Implementation of Protocols to Reduce Risk

Procedures and practices have been implemented to minimize the risks of transmission. Industry-specific protocols, public health orders, guidance and notices, frontline workers, managers, our JHSC representative, CDC, COVID-19 Canada, Restaurants Canada, BCRFA and ABLE association were utilized for information, input and guidance.

Reduction of Risk of Person-to-Person Transmission

Implementation of protocols to protect against identified risks to reduce the hazard of the virus spreading through droplets in the air. Different protocols offer different levels of protection. Wherever possible, the protocol that offered the highest level of protection was used. Consideration of the second, third and fourth levels were applied when the first level was not practicable. At times more than one level of protection to deal with a risk was required. The four levels of protection are:

First level protection (elimination controls):	For example; Self-serve buffet style food service is suspended until further notice.
Second level protection (engineering controls):	For example; plexiglass barriers installed at select locations to separate people and reduce chance of transmission.
Third level protection (administrative controls):	For example; policies and guidelines, such as cleaning protocols.
Fourth level protection (PPE controls):	Only when the first three levels of protection are not enough to control the risks, our employees and patrons use personal protective equipment (PPE) such as face coverings/non-medical masks. PPE is not used as the only control measure, but rather in combination with other measures.



3 Employee Health

First-level protection (elimination controls):

- Effective November 8, 2021, all employees must provide proof of full vaccination or weekly negative test results (refer to Gateway Policy #: C – 2.1 Vaccination-Mask-Testing).
- Self-serve buffet style food service is suspended until further notice.

Second-level protection (engineering controls):

- **Plexiglass barriers** are installed at areas of frequent employee/guest interactions such as the Cage, Security Podiums, Point of Sale Locations, Guest Service Desks and Table Games.
- **Heating, Ventilation and Air Conditioning (HVAC)** systems are checked to ensure they are well-serviced and operating within established service frequencies (e.g. filters and other consumables are replaced at appropriate frequencies).

Third-level protection (administrative controls):

- Gateway uses select **communication channels** to educate guests on what to expect upon arrival at our casinos, and their responsibilities to maintain a safe environment for fellow guests and employees.
- Management completed a COVID-19 **risk assessment** of each property, assessing the issues covered in this document and identifying unique site-specific areas of concern. Joint Health & Safety Committee members contribute to this assessment upon their return to work.
 - Alternative methods were sought for any task or function deemed to represent a high risk of COVID-19 communication.
- **Back of house health & safety reminders** are posted throughout the property reminding employees of the proper way to wear, handle and dispose of masks, wash hands, sneeze and to avoid touching their faces.
- All public and shared spaces within the casino are thoroughly **cleaned** prior to opening to the public, following applicable provincial health & safety guidelines and using products approved by applicable health authorities to disinfect surfaces.
- All contact surfaces are sanitized upon completion of any Security-related incident (in addition to standard sanitization protocols)
 - Handcuffs, holding rooms/interview rooms, medical rooms and all related equipment and contact surfaces are sanitized after each use
 - Standard protocols are followed unless a specific incident requires more invasive contact (e.g. taking a subject into custody for a criminal offense, physical removal of a problem patron or medical crisis)
- **Frequent handwashing** with soap is vital to help combat spread of the virus. All Gateway employees follow the existing Gateway Handwashing Standard Operating Procedure

(SOP).

- Employees are instructed to wash their hands with soap and water or use sanitizer 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 a shift.
- Proper handwashing signs are posted throughout the casino.
- Employees receive **training** on COVID-19 prevention through the online training platform and/or in person sessions.
 - Employees complete the training prior to their first scheduled shift and attest to completing the training through a manual or electronic sign-off.
 - Training includes items such as; hand washing requirements, physical distancing requirements and self-monitoring of COVID-19 symptoms.
- Employees conduct a **COVID-19 self-assessment** prior to attending the site for each shift. Gateway maintains records of all employee attestations.
- Employees showing **symptoms of COVID-19** are prohibited from Gateway Casinos and remain appropriately isolated at home, including:
 - Anyone who has symptoms of COVID-19, including fever, chills, new or worsening cough, shortness of breath, sore throat, and new muscle aches or headache.
 - Anyone directed by Public Health to self-isolate.
 - Anyone who has arrived from outside of Canada (and been advised to quarantine as per federal quarantine requirements) or who has had contact with a confirmed COVID-19 case.
- Employees who become sick during their shift **notify their manager immediately**, even with mild symptoms.
- Employees with COVID-19 symptoms are immediately separated from other employees and guests and advised to go home or to a healthcare facility (depending on the severity of symptoms) and to follow public health guidance on caring for oneself and others.
 - Sick employees are advised of self-isolation criteria from public health authorities and reminded they are not to return to work until they have met public health criteria to discontinue self-isolation.
 - Employees are told to not attend work if they are sick and they should notify their manager if they become sick with COVID-19 symptoms, test positive for COVID-19, have been exposed to someone with COVID-19 or been exposed to someone with COVID-19 symptoms (confirmed or suspected).
 - Areas recently used by sick employees are immediately removed from service and not returned to service until cleaning and disinfecting has been completed.
 - Notify site HR Department.

- Sick employees are advised to use the online Provincial COVID-19 Self-Assessment Tool which provides recommendations for COVID-19 testing; employees should follow these recommendations.

Fourth-level protection (personal protective equipment):

- Employees are provided and required to wear **face coverings** (i.e. masks) in all public areas (e.g. foyers, gaming floors etc.) and non-public areas where physical distancing cannot be guaranteed (e.g. hallways, count rooms, shared offices etc.). This is reviewed regularly and updated as appropriate to align with public health guidelines.
- Appropriate **personal protective equipment** (PPE) is worn by employees based on role and responsibilities and in adherence to provincial regulations and guidance.
 - Training on how to properly use and dispose of PPE is mandatory and provided in SOPs.
- Any employee required to come within two meters of any person (a) not wearing a mask or (b) wearing a face covering that doesn't cover their mouth, nose and chin (i.e. a face shield), is required to wear PPE that provides protection to the employee's eyes, nose and mouth. Examples include, but are not limited to:
 - F&B servers, bar staff and wait staff are required to wear a face shield (or goggles), in addition to a face mask, when serving patrons who are not wearing masks.
 - Gaming floor staff are required to wear a face shield (or goggles), in addition to a face mask, when interacting with patrons who are not wearing a mask (e.g. those wearing a face shield instead of face mask).

This does not apply to scenarios where the employee and patron are separated by plexiglass or other impermeable barrier.

- **Hand sanitizer dispensers**, touchless whenever possible, are located at key guest and employee entrances and contact areas such as reception areas, lobbies, casino floor, restaurant entrances, meeting and convention spaces, elevator landings, pools, salons and exercise areas.
 - Hand sanitizer is provided at each timeclock location and employees are required to sanitize their hands after clocking in.

4 Guest Health

First-level protection (elimination controls):

- Effective November 8, 2021, all employees must provide proof of full vaccination or weekly negative test results (refer to Gateway Policy #: C – 2.1 Vaccination-Mask-Testing).
- Self-serve buffet style food service is suspended until further notice.

Second-level protection (engineering controls):

- **Plexiglass barriers** are installed at select areas of frequent employee/guest interactions, such as the Cage, Security Podiums, Point of Sale Locations, Guest Service Desks and Table Games.
- **Heating, Ventilation and Air Conditioning (HVAC)** systems are checked to ensure they are well-serviced and operating within established service frequencies (e.g. filters and other consumables are replaced at appropriate frequencies).

Third-level protection (administrative controls):

- Gateway uses select **communication channels** to educate guests on what to expect upon arrival at our casinos, and their responsibilities to maintain a safe environment for fellow guests and employees.
- Management completed a COVID-19 **risk assessment** of each property, assessing the issues covered in this document and identifying unique site-specific areas of concern.
 - Alternative methods were sought for any task or function deemed to represent a high risk of COVID-19 communication.
- All public and shared spaces within the casino are thoroughly **cleaned** prior to opening to the public, following applicable provincial health & safety guidelines and using products approved by applicable health authorities to disinfect surfaces.
- **Front of house health and hygiene reminders** are posted throughout the site such as the proper way to wear, handle and dispose of masks, and washing of hands.
- **Frequent handwashing** with soap is vital to help combat spread of the virus.
 - Proper handwashing signs are posted throughout the casino.
- Guests are checked for **proof of full vaccination** (refer to SOP) and conduct a **COVID-19 self-assessment** prior to entering the site.
 - Patrons self-assess in accordance with the advice, recommendations and instructions of the Office of the Chief Medical Officer of Health before they enter the premises of the establishment.

- Management and employees are given instruction on how to respond swiftly and **report any presumed cases** of COVID-19.
 - Guests who display COVID-19 symptoms are advised of home isolation criteria.
 - Guests with COVID-19 symptoms are immediately separated from other guests and employees and advised to go home or to a healthcare facility (depending on the severity of symptoms) and to follow public health guidance on caring for oneself and others.
 - Areas recently used by the sick guest are immediately removed from service, and not returned to service until cleaning and disinfecting has been completed.
 - Notify site HR Department.

Fourth-level protection (personal protective equipment):

- Guests are required to wear masks or appropriate **face coverings** in accordance with local and provincial health requirements, but are required to briefly lower face coverings for identification purposes in compliance with regulatory and safety requirements.
- **Hand sanitizer dispensers**, touchless whenever possible, are located at key guest and employee entrances and contact areas such as reception areas, lobbies, casino floor, restaurant entrances, meeting and convention spaces, elevator landings, pools, salons and exercise areas.

5 Joint Health and Safety Committee

Occupational joint health and safety committees play an important role in establishing and maintaining healthy and safe workplaces. They have opportunity to review and provide feedback on this H&S Plan as well as the site-specific plans as they may change from time to time.

Joint Health and Safety Committee are not meeting during the provincially mandated lockdown. Upon return, joint health and safety committees will be re-instated and will operate effectively during the COVID-19 pandemic, including:

- Ensuring there is a mechanism in place where employees can raise any concerns about the risk of COVID-19 exposure at the workplace to the joint committee.
- Having committee members participate in a walk-through assessment of the work process to identify potential areas of increased risk and priority action.
- Ensuring that the joint committee is involved in the development of control plans for different job tasks.
- Getting joint committee involved in promoting approved social distancing measures.
- Having joint committee provide feedback on the effectiveness of control measures implemented.



Department Specific Sanitization Policies

Casino Operations

Casino management continues to review risk assessments of areas of particular concern for COVID-19 transmission. It is each casino’s goal to include worker involvement to this process as much as is feasible. Increases to existing cleaning protocols and frequencies are required for all areas deemed to present an elevated risk of COVID-19 transmission. All gaming sites adhere to the following cleaning and sanitation frequencies.

	Example	<u>Cleaning Protocols</u>	<u>Disinfecting Protocols</u>
No Touch Areas	<ul style="list-style-type: none"> <input type="checkbox"/> Automatic doors <input type="checkbox"/> Shipping/Receiving Area <input type="checkbox"/> Facility Maintenance Workshop <input type="checkbox"/> BOH Floors/Walls <input type="checkbox"/> FOH Carpet/Floors/Walls 	No increase to pre-COVID- 19 cleaning schedules	



Low Touch Areas	<ul style="list-style-type: none"><input type="checkbox"/> Back of house non-shared desks<input type="checkbox"/> Elevators (walls, floor)<input type="checkbox"/> Plexiglass<input type="checkbox"/> Access Control Keypads<input type="checkbox"/> Employee Breakroom surfaces<input type="checkbox"/> Ballot Drums<input type="checkbox"/> Slot Machines<input type="checkbox"/> Slot Chairs<input type="checkbox"/> Table Game Chairs<input type="checkbox"/> Pit Stand<input type="checkbox"/> Gaming Chips/Table Game Equipment<input type="checkbox"/> Public Telephones (taxi/visitor/pay)<input type="checkbox"/> Stanchions	Cleaned and disinfected once per day
High Touch Areas	<ul style="list-style-type: none"><input type="checkbox"/> Doorknobs<input type="checkbox"/> Handrails<input type="checkbox"/> ID Scanner<input type="checkbox"/> Table Game Rails<input type="checkbox"/> Elevator Buttons<input type="checkbox"/> Kiosks/ATMs<input type="checkbox"/> Washroom Surfaces<input type="checkbox"/> Redemption Counters<input type="checkbox"/> Guest Services Desks<input type="checkbox"/> Exterior Doors (depending on direction)<input type="checkbox"/> Self-Serve Stations (if operating)<input type="checkbox"/> Serving Trays	Cleaned and disinfected twice per day and when visibly dirty
Personal Use Items	<ul style="list-style-type: none"><input type="checkbox"/> Employee Radios<input type="checkbox"/> Wheelchairs<input type="checkbox"/> Shared employee desks and workstations<input type="checkbox"/> Interac Terminal Keypads<input type="checkbox"/> Trolleys, carts, pump trucks etc.<input type="checkbox"/> Self-Exclusion Area<input type="checkbox"/> Employee Keys<input type="checkbox"/> Employee Keypads<input type="checkbox"/> First Aid equipment<input type="checkbox"/> Shared Vehicles<input type="checkbox"/> Biometric Readers	Cleaned and disinfected by the user after each individual use (i.e. before being made available to a new user) and at the end of each shift



Discontinued Use	High touch items where cleaning is difficult, or is not essential to the operation of the casino, may include items such as: <input type="checkbox"/> Shared Pens	Item is removed from service
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Gaming site management use the above table as a guideline. Unique areas of concern specific to an individual site are assessed against the same table and attributed the same frequency of cleaning. Individual sites may vary based on volume, size, amenities, etc.

Site management assign staff accordingly to accomplish the above and use cleaning products and protocols approved for use and effective against viruses, bacteria and other airborne and bloodborne pathogens.



Resources

Public Health Canada

- Risk mitigation tool for workplaces/businesses operating during the COVID-19 pandemic

<https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/guidance-documents/risk-informed-decision-making-workplaces-businesses-covid-19-pandemic.html>

- Non-medical masks and face coverings: About

<https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/prevention-risks/about-non-medical-masks-face-coverings.html>

Ontario Ministry of Health

- COVID-19 Guidance: Essential Workplaces

https://www.workplacesafetynorth.ca/sites/default/files/uploads/COVID-19_guidance_essential_workplaces_MOH-2020-05-02.pdf

Ontario Ministry of Labour

- Restaurant and food services health and safety during COVID-19

<https://www.ontario.ca/page/restaurant-and-food-services-health-and-safety-during-covid-19>

Public Health Ontario

- Prevention
 - How to Protect Yourself from COVID-19
 - Reduce Your Risk from COVID-19
 - Non-medical Masks and Face Coverings
 - Non-Medical Masks: Detailed Q&A
 - Mask Use for the Workplace (Non-Healthcare Settings)
 - How to Wash Your hands and How to Use Hand Sanitizer
 - Physical Distancing
 - Cleaning and Disinfection for Public Settings

<https://www.publichealthontario.ca/en/diseases-and-conditions/infectious-diseases/respiratory-diseases/novel-coronavirus/public-resources>

Ontario Public Services Health and Safety Association

- COVID-19 Resource Centre - Tools and resources for workers and employers

<https://www.pshsa.ca/covid-19>