



## **HUDDLE DIVERSITY PLAN**

### **INTRODUCTION**

Huddle Gaming, Inc. (“Huddle”) provides 24/7/365 trading and risk management services to B2C sports betting operators. The goals underlying this Diversity Plan are to ensure equal opportunity and to promote diversity in a manner reflective of the local community where Huddle operates.

### **EQUAL EMPLOYMENT OPPORTUNITY**

Huddle affirms its commitment and pledges its full support of equal employment opportunity for all persons, regardless of race, color, religious creed, ancestry, age, sex, national origin, disability, or military status.

### **DISSEMINATION OF PLAN**

The company CEO has been designated as Huddle’s Diversity Officer. The Diversity Officer is responsible for disseminating the Plan to all employees and for providing a copy of the Plan to all newly hired employees at initial orientation, posting it in shared areas, annual distribution to all employees, posting the Plan on the company website, and publication in the employee handbook.

### **EMPLOYMENT/WORKFORCE DIVERSITY**

#### **EMPLOYMENT MISSION**

Huddle is committed to recruiting, developing, and retaining the most qualified employees regardless of race, color, religious creed, ancestry, age, sex, national origin, disability, or military status. Huddle provides all applicants and employees with equal opportunity in recruitment, selection, appointment, promotion, training, delegation, discipline, and separation. We also make every effort to hire and promote minority groups and women, and to involve them in every level of employment and decision-making.

Huddle’s recruiting efforts include, but are not limited to:

- Posting employment opportunities in newsprint, radio, tv/media, and internet.

- Attendance at community job fairs sponsored by local institutions of higher education, trade schools, media, and diversity groups

## **COMPLAINT PROCEDURE**

Workplace harassment is a form of discrimination that violates Title VII of the Civil Rights Act of 1964 and other federal regulations. The Equal Employment Opportunity Commission (“EEOC”) defines harassment as unwelcome verbal or physical behavior that is based on race, color, sex (including pregnancy), gender/gender identity, nationality, age (40 or older), physical or mental disability, or genetic information. This behavior is considered harassment or discrimination when the offensive conduct becomes a prerequisite to continued employment or if a reasonable person would consider the workplace intimidating, hostile, or abusive. If any person believes he or she has been subject to harassment or discrimination, the individual should report the incident to his or her immediate supervisor. In the event a satisfactory solution is not achieved, or if the nature of the problem is such that the individual is uncomfortable reporting it to the supervisor, the individual is encouraged to report the issue to the Diversity Officer. All complaints will remain confidential. Huddle prohibits retaliation against any complainant or participant in the complaint process.

Harassment is dealt with further in Huddle’s Anti-harassment and Bullying Policy.

### **BREACHES OF DIVERSITY POLICY:**

Huddle’s takes a strict approach to breaches of its Diversity Policy and breaches will be dealt within accordance with Huddle’s Disciplinary and Capability Procedure.

If an employee believes he/she has suffered discrimination, the employee may raise the matter through Huddle’s Grievance Pro-Grievance Procedure or Anti-harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

Making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under Huddle’s Disciplinary and Capability Procedure.

## **TRAINING, DEVELOPMENT, AND RETENTION EFFORTS**

Huddle provides employees with departmental training that allows them to successfully integrate into their departments. Employees are strongly encouraged to apply for open vacancies whenever possible and Huddle provides training opportunities to employees, so they can develop the skills necessary to advance within the company.

## **PROCUREMENT/VENDOR PURCHASING**

Huddle considers quality, service, dependability and price as the main components of any vendor relationship. We pledge to partner, wherever possible, with minority and women vendors, as

well as other diverse groups, to create a mutually beneficial business climate. Huddle’s goal is to ensure that all qualified vendors are given equal opportunity to bid on products and services.

### GOOD FAITH PLAN FOR MINORITY VENDOR PARTICIPATION

Huddle diverse vendor purchasing initiatives include:

- Conduct workshops and other activities to increase MWBE awareness of the types and volumes of goods and services that Huddle purchases for its business.
- Establishing a reasonable payment plan, agreed upon by both the vendor and the Purchasing Department after review of the financial status of diverse vendors.

### VENDOR REQUIREMENTS

Vendors are licensed in accordance with the Pennsylvania Gaming Control Board’s regulations. Huddle additionally reserves the right to complete a due diligence background check on any vendor.

### PURCHASING OBJECTIVE

Huddle’s extensive efforts to identify, train, and assist MBEs, WBEs, as well as other diverse groups of potential vendors results in a roster of vendors that maximizes diversity and is reasonably reflective and inclusive of the communities in which the company operates.

### **DIVERSITY PLAN EFFECTIVENESS ASSESSMENT**

An important part of our diversity plan is the measure of its effectiveness. This objective is achieved by means of preparing a quarterly report that provides a performance assessment of Huddle’s Diversity Plan for the preceding year.

### **CONCLUSION**

Huddle works as a team to develop a high-performing, inclusive work environment reflective of its diverse community. We strive to create a company culture where all ideas and all contributions are valued. Our commitment to making inclusiveness the foundation of our culture is driven not only from our desire to enhance the community, but also from its importance to maintaining a sound business strategy.

**DIVERSITY PLAN STATEMENT**

Gaming Service Provider Applicant Name Huddle Gaming, Inc.

Gaming Service Provider Applicant Mailing Address \_\_\_\_\_

Gaming Service Provider Applicant Phone Number 917-273-9041

Equal Opportunity Officer Francesco Borgosano, CEO

Date Submitted 4 / 18 / 2024

Pursuant to §1325(b)(1) of the Pennsylvania Race Horse Development and Gaming Act and 58 Pa. Code Ch. 481a.

Huddle Gaming, Inc.

**\_\_\_\_\_ (Gaming Service Provider Applicant's Name)  
has developed and implemented a diversity plan, and the diversity plan complies with the Act and  
its Regulations.**

*Francesco Borgosano*

\_\_\_\_\_  
Signature of CEO

Francesco Borgosano, CEO

\_\_\_\_\_  
Printed Name

4 / 18 / 2024

Date