

**Caesars Entertainment Health and Safety Plan**  
**Ongoing Operations**  
**COVID-19**

**Caesars Atlantic City**  
**Harrah's Atlantic City**  
**Tropicana Atlantic City**

**Updated July 13, 2022**

## **PURPOSE**

The purpose of this document (“Plan”) is to set forth the protocols to be implemented by the Caesars Entertainment Atlantic City Casino and hotel operations as well as back-of-house operations to mitigate and reduce risk of exposure to infectious diseases such as COVID-19. The following information is intended to serve as a guide for safe and effective ongoing maintenance of guest areas and team member workspace areas. All property areas identified will be cleaned and disinfected according to the Plan, based on information provided by the World Health Organization (“WHO”), Centers for Disease Control and Prevention (“CDC”), and United States Environmental Protection Agency (“USEPA”), in addition to local health districts and leading industry experts.

Responsible Gaming is one of the foundations of our Code of Commitment. As part of our Code of Commitment, we have been leading the industry in the development of Responsible Gaming practices to inspire grown-ups to play responsibly, while offering help to guests when gambling is no longer enjoyable. The various programs we have developed to promote responsible gaming over the past several decades are in service of these goals. Our integrated approach to responsible gaming is built on clear objectives, measurable outcomes and scientific research and evidence. It is supported by professional staff training and state of the art, purpose-built information technology systems, as described more fully on our website at [caesars.com/corporate/corporate-social-responsibility/play/responsible-gaming](https://caesars.com/corporate/corporate-social-responsibility/play/responsible-gaming). We will continue to maintain this commitment to responsible gaming throughout this public health emergency caused by COVID-19 and beyond.

Compliance with this Plan is the responsibility of all Team Members and, similar to the Caesars Entertainment Corporation Ethics and Compliance Program, the senior executives of each operating property, business unit, and shared services unit are responsible for assisting in compliance with this Plan, which shall include active implementation and monitoring for compliance with the COVID-19 requirements.

## **DEFINITIONS**

<i>Clean</i>	Physical process to remove germs, dirt, and impurities from surfaces
<i>Disinfect</i>	Typically a chemical process to kill germs on surfaces
<i>PPE</i>	Personal Protective Equipment
<i>Hard Surface</i>	Semi-porous or non-porous surface including (but not limited to) wood, drywall, tile grout, hardwood floor, linoleum, concrete, glass, metal
<i>Soft Surface</i>	Porous surface including (but not limited to) carpeting, clothing, bedding, pillows, mattresses, upholstered furniture, fabrics, leather, wall insulation, ceiling tile
<i>Non-Food Contact Surface</i>	Hard surface that is not used for food preparation or containment such as countertops, handles, knobs, doors, etc.
<i>Food Contact Surface</i>	Hard surface used specifically for food preparation or containment such as glassware, plates, utensils, knives, cutting boards, storage containers, etc.

## **GUIDELINES PRIOR TO OPENING**

### **Cleaning and Disinfecting**

It is important to note the difference between cleaning and disinfecting surfaces. According to the CDC, cleaning is a physical process that removes germs, dirt, and impurities from surfaces but does not kill bacteria or viruses. The method reduces bacterial and viral counts on the surface to decrease potential spread. Conversely, disinfecting is typically a chemical process to kill bacteria and viruses but does not necessarily remove dirt or other impurities from the surface. The CDC recommends a combination: clean a surface first to remove all dirt and impurities in order to expose the surface entirely, and then disinfect the clean surface with an appropriate chemical and chemical contact time.

#### *Surface Types*

Due to the complexity of casino and hotel operations, several different surface materials are present throughout the properties. For simplicity, these have been categorized into hard (semi- and non-porous) or soft (porous) surfaces. Hard surfaces can generally be cleaned and disinfected with an EPA registered chemical product (e.g., Ecolab – Peroxide Multi Surface Cleaner and Disinfectant; EPA #1677-238). Depending on the product used, contact surface time varies, although usually an effective viral disinfectant requires around five minutes of contact time. The surface must be visibly wet for the entire required time frame. In general, surfaces can then be wiped and allowed to air dry. Food contact surfaces and non-food contact surfaces will be addressed appropriately. Most hard surface disinfectants are not suitable for glassware, dishes, or silverware, and the dishwasher will be utilized for these items, with a steam setting if possible. Team members will refer to the product sheet for all chemicals used for both food and non-food contact surfaces to ensure proper usage.

Soft surfaces (linens, carpets, rugs, drapes, cushions, etc.) can be cleaned using soap, water, and steam. The CDC recommends laundering items (if possible) according to manufacturer's instructions. The warmest water setting possible will be used, and the item will be dried completely. For surfaces that cannot be laundered, visible contamination will be removed (if present), followed by a water/soap solution, and lastly a steam treatment if possible.

#### *Electronics*

For electronics including cell phones, tablets, touch screens, keyboards, video screens, ATM machines, bill breaker machines, radios, etc., visible contamination will be removed (if present) and the manufacturer guidelines for cleaning and disinfecting the device will be followed. If no manufacturer guidance is available, a CDC or EPA recommended cleaner shall be used. All surfaces will be dried thoroughly.

#### *Personal Protective Equipment ("PPE")*

Team members will consult the chemical Safety Data Sheet ("SDS") for appropriate PPE.

## **Water, Electrical, and HVAC Systems**

Comprehensive guidelines have been developed regarding the inspection, operation, and maintenance of these systems and those guidelines are followed.

## **Water Features, Pools, and Hot Tubs**

Manufacturer guidelines will be referenced to clean and disinfect water features, pools, and hot tubs. In general, the CDC recommends removing any visible slime or biofilm before filling with water and performing a disinfection procedure before use.

## **Training**

Team members will be trained on proper cleaning and disinfecting protocols and training will be provided on how to properly use and dispose of all PPE according to company guidelines. Comprehensive training will be conducted on all aspects of the plan for Team Members in all departments including but not limited to, housekeeping, food and beverage, internal maintenance, hotel operations, casino operations, and security. Training will be conducted through a range of methods, including, in-person sessions, telephonic/video conferencing and/or through written materials such as Standard Operating Procedures. Team members will be informed of proper PPE required for cleaning and day-to-day operations. Each department leader will review and relay new HR Protocols as they are made available.

Signage for team members will be created and displayed (in both English and Spanish) to promote the cleaning process and products in addition to standard PPE for team members to reference in the back of house area.

## **GUIDELINES FOR DAILY OPERATION**

The following guidelines for daily operation focus on the guest experience and team member interaction. The following procedures are set forth to comply with applicable federal, state, and local guidelines with respect to operations in each of the identified locations and venues at our properties.

### **Masks**

In accordance with New Jersey Executive Order 292 the Public Health Emergency in New Jersey was terminated effective March 7, 2022.

Patrons are not required to wear masks, while they are in indoor public spaces, including but not limited to retail, recreational and entertainment businesses, food and beverage establishments and casinos, but patrons, of course, may choose to wear masks at their discretion.

Patrons will be required to lower their mask when conducting cashier transactions and when requested for identification purposes.

## **Team Members**

Team Members will be instructed to stay home if they do not feel well and to utilize wellness nurse visits if feeling ill or showing flu-like symptoms. Team Members will be instructed to contact a supervisor or manager if they notice a co-worker experiencing symptoms such as coughing, shortness of breath, or other flu-like symptoms. Team members must report all positive test results to Human Resources, and they are not allowed to enter the casino complex until cleared to return to work by Human Resource. See also Appendix C for contact tracing protocols.

Team members are not required to wear company-issued masks as part of their uniform, but may continue to do so if they so choose.

Hand washing, cleaning, and disinfecting education will continue as appropriate via signage and/or team meetings.

## **Protocol for Ill Guests**

Caesars Entertainment team members are well versed in how to react to ill guest situations and do so with empathy, respect, confidentiality and professionalism. All team members working in an area that has guest access or have electronic/telephonic communication with guests are reminded to immediately notify their supervisor or security team if the team member encounters or is made aware of an ill guest situation that may be associated with COVID-19. See also Appendix C for handling ill guests and contact tracing protocols.

## **Cleaning, Sanitizing and Disinfecting**

The Casino Hotel facilities shall be regularly cleaned, sanitized, and disinfected with an emphasis on “high touch areas”. The Management of each department shall determine the frequency of cleaning and sanitizing based on level of business and the particular needs of each department.

## **Casino**

### *General*

Hand sanitizer stations will be positioned throughout the gaming floor and around table game areas. Hand sanitizer will be made available and provided upon guest request.

### *Table Games*

Sanitizing will occur at table games as needed. The rails and chairs at each gaming table that is in use will be disinfected as needed and anytime that a guest may request the cleaning of a particular gaming table surface area. Dealers will make hand sanitizer available for customers at the tables.

### *Sports Book and Racing*

Hand sanitizer is available to customers at the counters upon request.

Team members will clean and disinfect high-touch surfaces of betting kiosks as needed and anytime that a guest may request the cleaning of a particular area or kiosk. Hand sanitizer will be available to customers at windows and upon request.

### *Food Service on Casino Floor and Sports Book*

To the extent food service is offered in such areas, food service to guests shall follow the same food service requirements as provided for in this Plan as set forth below.

## **Food and Beverage Outlets**

Consideration has been given to certain of the best practices outlined in NJ DOH July 2021, Guidance for Indoor and Outdoor Dining with respect to the operation of Food and Beverage outlets, including kitchens.

[https://nj.gov/health/legal/covid19/Indoor\\_Dining\\_Guidance\\_7-1-21.pdf](https://nj.gov/health/legal/covid19/Indoor_Dining_Guidance_7-1-21.pdf)

### *Restaurants*

Hand sanitizer stations will be available for guests at each entrance to the restaurant.

For Team Members, a wall-mounted hand sanitizer station will be located inside kitchen doors for servers, cooks, and management to use frequently.

Podiums, countertop surfaces, POS systems, etc. will be cleaned and disinfected as needed while in use.

### *Food Courts and Quick Service Restaurants*

Hand sanitizer stations will be available for guests at each entrance and throughout large areas. Team members will clean and disinfect the countertop as needed.

### *Buffets*

Buffets will follow all cleanliness standards and any other required government directives with respect to same.

### *Lounges and Bars*

Hand sanitizer will be available to customers upon request. Team members will clean and disinfect the countertop as needed. Communal ice machines, tubs, and storage will be emptied, cleaned, and disinfected as needed.

### *Nightclubs*

Indoor showrooms and nightclubs will comply with all then-current government guidance with respect to such venues.

### *Kitchens*

Dish and glass washers will be inspected for appropriate chemical and temperature frequently. Food contact surfaces and non-food contact surfaces will be addressed appropriately. Team members will refer to the product sheet for all chemicals used for both food and non-food contact surfaces to ensure proper usage. Countertops and workspace surfaces will be cleaned and disinfected at open, close, and as frequently as needed. Communal ice machines, tubs, and storage will be emptied, cleaned, and disinfected regularly.

Team members will be encouraged to wash their hands every break period for a minimum of 20 seconds and further encouraged to do so frequently throughout the day.

A wall-mounted hand sanitizer station will be located inside kitchen doors for servers, cooks, and management to use frequently.

## **Hotel**

NJ DOH Protocols and Guidance for Hotel Sanitization (NJ ED 20-024) as updated on November 24, 2021, will be followed.

### *Front Desk, Check-In, and Bell Desk*

Hand sanitizer will be available on the counter, and team members will make hand sanitizer available to guests when requested. Team members will clean and disinfect the countertop as needed.

*Check-in kiosks:* Touch screens will be cleaned and disinfected throughout the day while in use. Hand sanitizer stations will be positioned near the kiosks, and/or hand sanitizer will be provided to guests if requested.

Carts, wheelchairs, and baggage carts will be cleaned and disinfected as needed.

### *Guest Rooms and In-Room Services*

Guests checking in at the front desk will be informed that, if they would like to decline in-room housekeeping service during their stay, the guests should utilize the "Do Not Disturb" sign and/or mechanism on the outside of the hotel room door. Each casino property will follow its



Do Not Disturb wellness check procedures for any guests declining daily in-room housekeeping. Room deliveries will be bagged and hung on the door. Team Members will knock on the door and ensure guests receive any deliveries.

If a guest was ill while in a guest room, that room will be taken out of service and cleaned in accordance with enhanced cleaning and disinfecting guidelines.

### *Laundry*

The CDC recommends laundering items according to manufacturer's instructions using the warmest water setting possible and drying the item completely. The steam setting will be used if available and applicable. Team members will follow biohazard protocol for guests with known flu-like symptoms. Shaking or excessively disturbing dirty laundry will be avoided. Clothes hampers and clothing transportation carts will be cleaned and disinfected according to the surface type. Disposable gloves shall be worn when handling dirty laundry.

### *Salons and Spas*

Salons will follow guidance provided by regional boards of cosmetology. Similarly, spas will follow guidance provided by regional boards of massage therapy and will refer to the American Massage Therapy Association for applicable resources. Salons and spas will clean and disinfect surfaces, as may be required.

Hand sanitizer will be available in spas and salons, and team members will provide hand sanitizer to guests, if requested

### *Fitness Centers*

Hand sanitizer will be available in the fitness center and team members will provide hand sanitizer to guests, if requested.

Fitness Centers shall follow any then-current government guidance with respect to such venues.

### *Pools*

Pool chairs, loungers, and cabanas will be cleaned and disinfected as needed. Hand sanitizer will be made available upon request. Countertops will be cleaned and disinfected as needed. Lifeguard stations will be cleaned and disinfected as needed. Pools will follow any then current government guidance with respect to such venues.

*Business Centers:* Hand sanitizer will be made available upon request. Any equipment or surfaces will be cleaned and disinfected as needed.

### *Retail Outlets*

Retail Stores shall follow any then-current government guidance with respect to such venues.

### *Theatres and Show Rooms*

Theatres and show rooms will comply with any then-current government guidance with respect to such venues.

### *Rides and Attractions*

Rides and attractions will follow any then-current government guidance with respect to such venues.

### *Convention Meetings and Banquets*

Convention meetings and banquets will follow any then-current government guidance with respect to such venues. Food Service at such events will also follow any then-current government guidance as set forth above in the Food & Beverage section of this Plan.

Hand sanitizers or hand washing stations will be made available in the convention areas both in front and back of house hallways. Regular cleaning and sanitizing of public areas will be conducted, with attention being paid to high-touch points.

### *Common Areas*

Common high-touch areas such as handrails, escalators rails, elevator panels, door handles, etc. will be cleaned and disinfected regularly.

## **APPENDIX C: RESPONDING TO GUEST AND TEAM MEMBER ILLNESS AND CONTACT TRACING EFFORTS FOR POSITIVE COVID-19 CASES**

### **GUEST ILLNESS**

Team Members are well versed in how to react to ill guest situations and will do so with empathy, respect, confidentiality and professionalism. All Team Members working in an area that has guest access or have electronic/telephonic communication with guests are reminded to immediately notify their supervisor or security team if the Team Member encounters, or is made aware, of an ill guest situation that may be associated with COVID-19.

### **CONTACT TRACING**

#### **Contact Tracing for Positive COVID-19 Guest Cases**

When advised that a guest was tested and determined to be COVID-19 positive and was in the casino hotel complex during a period when he/she may have been infectious to others:

Security will collect, if not already subject of an incident report, guest information including name, names of those sharing their hotel room, and close contact guests in their traveling party, and details about the guest's activities at the property (for possible contact tracing and enhanced cleaning) and will generate a report.

The incident report will include the information above as well as the guest's home address, room number (if applicable), date of COVID-19 diagnosis, and whether the guest was transported for medical care. The incident report will be updated as new information becomes available.

The Casino will take reasonable efforts to determine the areas traveled by a guest while on property and any Team Members with whom the guest may have had close, prolonged contact. Such efforts may include the use of resources such as surveillance system, player card/customer management system and guest interviews.

The Casino, may, in the alternative, engage a qualified third-party contact tracing service for contact tracing purposes.

Human Resources will be notified by Security or Risk Management of each Team Member who is suspected to have had close prolonged contact with the guest who tested positive for COVID-19 and Human Resources and/or Risk Management shall further ensure that the additional contact tracing procedures are performed.

Any Team Members who have been in close, prolonged contact with the guest will be directed to self-isolate/quarantine in accordance with CDC guidelines.

Any high-contact areas where the guest had extended contact will be cleaned and sanitized if not done so already when guest was removed from the property.

The Casino will respond to any and all information requests received from the NJDOH to facilitate any further contact tracing efforts.

The Casino shall also report to the local department of health any cases where it was reported to the Casino that a guest tested positive for COVID-19 during a time when the guest may have been infectious.

**Contact Tracing for Positive COVID-19 Team Member Cases:**

Any Team Member who has a confirmed diagnosis of COVID-19 shall report the occurrence to the Team Member's to the Human Resources Department.

When the Casino is advised that a Team Member was tested and determined to be COVID-19 positive and was in the casino hotel complex during a period when he/she may have been infectious to others: Human Resources, in conjunction with Risk Management, shall collect all pertinent information and generate a report which shall include:

- TM Name and TM ID Number
- TM Contact Information
- Date of COVID-19 diagnosis
- Whether the Team Member was transported for medical care
- Team Members or guests with whom the Team Member believes that he/she had close, prolonged contact while he or she was exhibiting symptoms of COVID-19 and the circumstances and locations of any such contact.

Human Resources or Risk Management will maintain a list of all Team Members known to have had such close prolonged contact with the Team Member who tested positive for COVID-19 and additional contact tracing procedures will be performed.

Any Team Members who have been in close, prolonged contact with the Team Member will be directed to self-isolate/quarantine in accordance with CDC guidelines.

The Casino shall report to the local department of health any cases where a Team Member tested positive for COVID-19 during a time when the Team Member was infectious, unless the positive test results for the team member were already reported by the local department of health to the Casino.

The Casino will comply with any information requests received from the NJDOH to facilitate any further contact tracing efforts.

**Contact Tracing for Positive Tenant and Vendor Employee COVID-19 Cases**

Vendors and Tenants will be requested to provide notice to the Casino if any of their respective Team Members have tested positive for COVID-19 and provide the Casino with information as to any Team Members with whom the employee indicated he/she had close prolonged contact for contract tracing purposes.

## Coordination with other Regulatory Agencies

All reports shall be maintained by the Casino will be made available to the local department of health and NJDOH personnel and their designees, including contact tracers, upon their request.

The Casino shall be available to coordinate with NJDOH personnel and their designees, including contact tracers, to provide or collect further information as described in the Sections above related to Team Members, guests or others who were determined to be COVID-19 positive.