

ORIGINAL

**CORPORATE ORDER # 0403.1
OF THE
MILLE LACS BAND CORPORATE COMMISSION**

The undersigned, the Commissioner of Corporate Affairs of the Mille Lacs Band Corporate Commission ("Commission"), a corporation and a political subdivision of the Mille Lacs Band of Ojibwe Indians ("Band"), hereby adopts the following Corporate Order effective this 25th day of March 2004.

WHEREAS, the Commission, in order to operate in an effective manner, needs to adopt policies governing the human resource and education and performance functions of all business entities of the Band;

WHEREAS, the Commission needs to adopt such policies and procedures governing the human resource and education and performance functions in a timely manner;

WHEREAS, it is not possible for the full Commission Board of Directors to assemble, meet, consider and take action upon such policies and procedures governing the human resource and education and performance functions in a timely manner;

WHEREAS, the Commissioner of Corporate Affairs is empowered pursuant to Band Statute 16 MLBSA § 111(b) to issue such regulations or take such directives as may be necessary to serve the best interest of the Commission via Corporate Order;

NOW, THEREFORE BE IT RESOLVED, that the Commissioner of Corporate Affairs hereby repeals all existing Company Policies and Procedures governing the human resource and education and performance functions and adopts the new policies, which are attached hereto at Exhibits A and B to this Order and made part hereof by reference thereto.

IT IS SO ORDERED,



Mitch Corbine

Commissioner of Corporate Affairs

**Corporate Commission of the Mille Lacs Band of Ojibwe Indians
Policy and Practice Manual**

Section: Education and Performance	Number: 90.000 Page: 1 of 3
	Issue Date: 7/17/2003
Procedure: Corporate Responsibility	Revision Date:
	Approval: <i>Mitch Collins</i>

I. Purpose

To define the role of the Corporate Education and Performance Department in relationship to the properties and the areas in which it must be involved. Further to explain the Corporate Education and Performance Department's responsibility for developing and documenting policies, practices, and programs that are authorized for use within the Company.

II. Policy

The Corporate Education and Performance Department is responsible for monitoring the design, development and approval of all significant and reoccurring courses, programs and their revisions as necessary to support the Company's direction and need for improved performance. The Corporate Education and Performance Department will collaborate with company businesses to identify and establish minimum training requirements for all associates.

All Education and Performance programs and courses that are developed for associates will be delivered as designed and written. Each Company business may and should add location specific information as needed, as long as the minimum, defined program requirements are met. A current copy of all course revisions/modifications shall be provided to the Corporate Education and Performance department.

It is the responsibility of the Corporate Education and Performance Department, in conjunction with the appropriate businesses, to conduct performance needs analysis, determine if training is needed, make suggestions and recommendations regarding new training requirements, and make revisions to existing training programs and courses.

When training is needed for a special group, i.e. one or two departments or a small business, it may be handled at the location in consultation with the Corporate Education and Performance Department. It is the responsibility of the Corporate Education and Performance Department to initiate, in collaboration with the businesses, policies as needed and ensure compliance.

- All Education and Performance contracts must be reviewed, and the Corporate Director of Education and Performance or his/her designee must approve the training that has been negotiated.

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- All training programs and outside training speakers offered on site shall be communicated to the Corporate Director of Education and Performance or his/her designee.
- Any consultant, outside training material or seminars used in developing significant and reoccurring programs or courses will be communicated to the Corporate Director of Education and Performance or his/her designee.

III. Practice


- A. Develops all internal training programs and courses and ensures all training courses are piloted and revisions made prior to course implementation.
- B. Researches and identifies industry trends and resources to ensure Education and Performance staff members are current, and are using the most efficient and effective technology.
- C. Assists the property Education and Performance Departments and small businesses in the support of operational performance improvement needs through coaching, mentoring and access to corporate resources.
- D. Collaborates with General Managers during the selection of candidates to fill positions at the Education and Performance Department Head level.
- E. Recommends and approves any Education and Performance Department organizational structure changes.
- F. Ensures best practices are communicated between property Education and Performance Departments and Corporate Gaming Group Department Heads. Audits training classes that are being conducted at the businesses to ensure quality and offers recommendations pertaining to technique, style, etc., to improve effectiveness.
- G. Reviews the evaluation and measurement components of training courses and the impact of the training programs for their contribution to achieving the Company's business objectives and goals
- H. Develops Corporate Education and Performance budgets and submits for approval.

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- I. Reviews annual training budgets at the property and makes appropriate recommendations.
- J. Provides annually required information so the businesses can prepare their operating budgets.
- K. Designs, develops and coordinates, as necessary, all appropriate orientation and training programs for non-casino businesses and the Corporate Office.
- L. Works in conjunction and coordinates with the Band Member Development Department to ensure quality programs are put in place for the benefit of Band members.
- M. Assists all businesses in developing Education and Performance Operational Procedures to ensure as much consistency as possible and that all approved programs are conducted in an effective manner.
- N. Monitors on a regular basis all Education and Performance policies and practices to ensure they are in compliance with the Company's expectations, and issues quarterly updates to the Commissioner of Corporate Affairs, Senior Vice President of Gaming Operations, Corporate Vice President of Human Resources, and properties General Managers and Education and Performance Directors.
- O. Develops or acquires special developmental programs that will assist Corporate Staff in improving individual performance, team building, planning effective and communication and to ensure the readiness to perform in a Corporate role.

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Section: Education and Performance	Number: 90.001 Page: 1 of 3
	Issue Date: 7/17/2003
Procedure: Outside Seminars	Revision Date:
	Approval: 

I. Purpose

To invest in an associate's professional and career development and help keep the Company current and abreast of new information and trends within its business. To provide associates with professional development opportunities, which may not be met by utilizing internal resources.

II. Policy


The Company is committed to investing in the continual development of its associates with the expectation that the investment will be returned through enhanced performance.

A seminar may be requested if it is related to the associate's current job or if the supervisor and Education and Performance Department deem the subject matter to be mutually beneficial to the associate and the Company.

III. Practice

- A. The Company will pay for the cost of approved outside seminars/conferences from organizations approved by the Education and Performance Department and the associate's Department Head. The Company reserves the right to determine at its sole discretion whether a seminar/conference is related to an associate's current job duties or offers the associate career growth opportunities that would benefit both the associate and the Company.
- B. The Education and Performance Department will carefully consider whether in-house training programs may address the associate's need and send associates only when an in-house program is not available or the associate would benefit from further training.
- C. Seminars and conferences will be considered as public courses or workshops taken for professional development.
- D. Seminars **MUST** be approved in advance by the Director of Education and Performance who will consult with Human Resources, functional department head and/or the Business General Manager and/or the Commissioner of Corporate Affairs, before giving final approval.

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- E. If approved, the Company will pay for the cost of the seminar at the associate's regular rate of hourly pay (up to a maximum of eight (8) hours per day), regular salary for salaried associates consistent with the Hours of Work Policy, and travel expenses in accordance with the Business Travel Policy.
- F. All expenses related to the seminar, i.e., hotel, meals, travel, etc., will be charged to the department the associate works in. Seminar expenses must be in line with the approved department budget.
- G. Seminars attended without prior approval will not be considered for payment.
- H. Associate's must have demonstrated a minimum overall rating of "meets standards" on their most recent performance appraisal, acceptable attendance as determined by their Department Head, and no written counseling notices three (3) months prior to paperwork submission.
- I. The associate will be required to sign a Withholding Authorization form authorizing the Company to deduct from the associate's future pay checks any costs incurred by the Company, should the associate fail to meet requirements of this policy.
- J. Successful seminar completion will be documented by the submission of a seminar evaluation form. Associates will have seven (7) days in which to submit an evaluation form to their immediate Supervisor and the Education and Performance Department.
- K. If the associate fails to provide evidence to their Department Head of seminar/conference completion, or notifies their Department Head of any extenuating circumstances which prevented their attendance, the Department Head will coordinate with the associate to repay costs incurred by the Company. The Department Head must notify Education and Performance of associates who did not attend any seminar/conference.
- L. If the associate fails to attend the registered seminar/conference, the amount will be deducted in increments of no less than \$25 per pay period to repay all costs incurred by the Company.

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- M. If an associate's employment is discontinued for any reason, unless initiated by the Company, costs associated with seminars attended 90 days prior to the associate's last day of employment, at the Company's option, may be deducted from the associate's final paycheck.

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Section: Education and Performance	Number: 90.002 Page: 1 of 3
	Issue Date: 7/17/2003
Procedure: Instructor/Sponsor Programs	Revision Date:
	Approval: 

I. Purpose

To ensure that the "top performers" from a department(s) are selected for the role of Instructors and Sponsors for specific Training Modules.

II. Policy

Each business will maintain an adequate number of Instructors/Sponsors to effectively support the implementation of the Education and Performance Department curriculum and job skills training modules.

Associates selected as Instructors/Sponsors not only will possess the appropriate level of technical knowledge, but will also be capable of communicating effectively with others, lead by example and be committed to train and assist fellow associates.

Hourly associates selected as Instructors or Sponsors will receive additional compensation when performing the duties of Instructor or Sponsor. Such training shall be conducted during the associate's regularly scheduled work hours.


Salaried supervisors will be paid their normal salary and, whenever possible, should be scheduled for training duty during their regular shifts.

General Managers and the Operations Team will encourage their staff members to participate as Instructors and Sponsors. The Corporate Education & Performance Department is responsible for monitoring and measuring the quality of the Instructor and Sponsor programs to ensure compliance with this policy and the program's effectiveness. The findings will be documented in regular reports to the property's General Managers.

III. Practice

- A. The Education and Performance Department is responsible for coordinating the selection and approval of Instructors/Sponsors and maintaining an adequate number for each specific module up to, and including, supervisory skills.
- B. A base number of Instructors/Sponsors will be established for every department/business in conjunction with the Director of Education and Performance and the Department Heads or business General Manager.

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- C. Instructor/Sponsor recommendations will be made by the management of each department/small business based on an associates technical knowledge and job performance, attendance, communication, and interaction with other associates, with the approval of their department head.
- D. All selected Instructor/Sponsor will attend the appropriate course and be certified before they are allowed to serve in the capacity of an Instructor/Sponsor.
- E. Once certified, Instructors/Sponsors will receive the following additional compensation for the time spent in this capacity (Paid by the E&P Department)

Non-Tipped Hourly

- 1. Instructors receive \$2.00 per hour premium pay.
- 2. Sponsors receive \$1.00 per hour premium pay.

Tipped Hourly


- 1. Instructors receive base hourly rate and average reported tip rate and \$2.00 per hour.
- 2. Sponsors receive base hourly rate and average reported tip rate and \$1.00 per hour.

- F. Instructors will be observed by co-facilitated sessions with one (1) instructors or Education and Performance staff members until it is determined they are capable of working on their own. This is a requirement for certification.

IV. Sponsor Responsibilities

- A. Meet new associates on their first day and assist in the check in process.
- B. Observe and coach new associates.
- C. Observe and coach new associates using job skills checklist to conduct training and achieve learning goals.
- D. Model appropriate behaviors while on the floor.


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V. Instructor Responsibilities

- A. Ensure room and materials are ready for training.
- B. Review materials and prepare for facilitation prior to class sessions.
- C. Model appropriate behaviors while instructing and when associate is on the floor working their shifts.
- D. Use Instructor and Participant Guides to deliver training.
- E. Provide feedback as necessary to the Education and Performance Department and the participant's supervisor.
- F. Encourage group participation and responses to questions posed by individuals and groups.
- G. Be available to answer associates questions while on the floor.

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Section: Education and Performance	Number: 90.003 Page: 1 of 2
	Issue Date: 7/17/2003
Procedure: Orientation/Entry Level Job Skills	Revision Date:
	Approval: 

I. Purpose

To welcome new associates and introduce them to the Company and the Mille Lacs Band of Ojibwe.

To ensure all associates receive an appropriate level of training prior to performing their job, and be prepared to provide the guest with a high level of Guest Service.

To inform new associates about the company mission statement, company expectations and apprise them of Company Policies and benefits that affect each associate.

II. Policy

In preparing all associates to perform their jobs in a way that presents the associate and the Company in a positive and professional light to our guests, the Company has initial orientation, guest service and job skills training requirements that must be adhered to.


All associates are required to complete Company Orientation, Guest Service Training and attend specific Job Skills Training, if applicable prior to being allowed to perform their job duties. Casino associates may not begin work prior to attending the Orientation Session.

Associates returning to work within 30 days are treated as if there was no break in their employment.

III. Practice


- A. All changes, updates, etc., to the Orientation packet are communicated by the Human Resource Department to the Education and Performance Department in a timely manner. The Education & Performance Department's HR Specialist will ensure new associate packets are prepared prior to each Orientation session.
- B. The Human Resource Department schedules new associates to attend the next available Orientation.

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- C. After Orientation classes, associates that will regularly receive “tips” will be paid the Federal minimum wage for their position when it is greater than their hired wage while in Orientation, Guest Service and Job Skill training.
- D. Applicants are not considered associates until completing Orientation.
- E. Property associates are required to attend Guest Service Training prior to performing their job duties.
- F. Supervisors are responsible for ensuring associates attend required training in accordance with company expectations.
 - 1. All associates transferring into a new job, except those wishing to become Dealers, will be paid for Job Skills Training to learn their new job.
 - 2. Associates who wish to learn to become a Dealer will attend Dealer Training on their time and they will not receive compensation for this training.

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Section: Education and Performance	Number: 90.004 Page: 1 of 2
	Issue Date: 7/17/2003
Procedure: Curriculum Development	Revision Date:
	Approval: 

I. Purpose

To define the responsibility of developing training programs so that there is a coordination of effort between Corporate and the businesses. To ensure that each associate receives a consistent message during training that supports the Company's operating policies and Mission Statement.

II. Policy

When developing curriculum it is important that consistent messages be imparted to the participants in a manner that promotes learning. All curriculum programs should provide the necessary information that supports an overall mission, strategy and operating policies and practices in all businesses.

Therefore, needs assessments, formal curriculum, Supervisory Skills Modules, and Executive Development programs will be designed, acquired, developed and produced in coordination with the Corporate Office. This is to ensure consistency and availability to all businesses and in coordination with the Company's behavioral learning style.

Each business has a responsibility to continually evaluate their training needs and strategies, consult with, and recommend new programs or program revisions, which will improve the operation of a department or a business and provide for the personal development of associates. All evaluations and recommendations should be communicated to the Corporate Director of Education and Performance.


Individual properties may not develop, revise or contract with outside consultants for the development or presentation of training programs by persons outside the company without the prior approval of the Corporate Director of Education and Performance.

Note: Outside persons being contracted to develop or present training programs may need to be licensed before performing the work.

III. Practice

- A. Based on the Program Designers role and responsibilities and/or recommendations received, the Corporate Education and Performance Department, in collaboration with the businesses, will address new training and development by defining the method of instruction to be used, researching the cost

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of program development (including all production costs), and prioritizing the development based on other identified Company needs.

Once it is determined that a training program needs to be developed, a "project team" may be established consisting of a Project Manager, Training Program Designer/Developer and Business Representative(s).

The Program Designer/Developer will be responsible for the writing and documentation of the program.

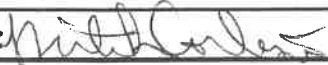
The Business Representative(s) will be responsible for providing input, reviewing and giving feedback on program content, and implementing pilot and instructor training. Business Representatives may consist of persons assigned to the property Education and Performance Department, Operations Department Representatives or Small Business Managers who are knowledgeable in and can provide meaningful input into the program being developed.

- B. Each business may develop periodic meetings to accommodate specific needs i.e., communication to support specific marketing promotions or events, gaming specific to the casino or individual refresher training requirements. However, outside resources may not be used without prior Corporate approval.

When the business determines that this type of training or meeting is required, the Director of Education and Performance at the property must communicate to the Corporate Director of Education and Performance through monthly schedule details. The specific need, the goals to be achieved, the training or communication approach that will be utilized, and person(s) who will be responsible for conducting the training will be mutually agreed upon prior to implementation.

- C. The Corporate Director of Education and Performance, in collaboration with the businesses, will review and approve ALL changes to training programs and materials prior to implementation.
- D. Outside consultants, trainers or seminar speakers may only be contracted after receiving approval from the Corporate Director of Education and Performance or his/her designee.

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Section: Education and Performance	Number: 90.006 Page: 1 of 1
	Issue Date: 7/17/2003
Procedure: Education and Performance Library	Revision Date:
	Approval: 

I. Purpose

To provide an Education and Performance library in each casino that will consist of a wide variety of educational and developmental resources including, books, audiotapes, videotapes and manuals to be used by associates to enhance personal and professional effectiveness.

II. Policy

Each property will maintain an Education and Performance library, the contents of which will be approved by the Education and Performance Department staff for use by any Company associate upon presentation of proper identification.

The library contains resources which may consist of books, manuals, audio or video tapes, etc., that pertain to the Band Government, Band Culture/History, the gaming industry, material regarding a specific job or department, self-improvement programs, management skills, guest relations, etc.

The libraries will be maintained by the Education and Performance Department at each property, and will be responsible for controlling its content and monitoring associate use.

III. Practice

- A. The property's Education and Performance Department will at all times maintain a current inventory of all items in the library. Regular communication on the library to encourage associates to use it will be coordinated through the Education and Performance Department.
- B. Any associate may use the library at no cost. When checking out material from the library the associate will sign for the material and be informed of the date the material is to be returned.
- C. Any associate who fails to return the material or returns the material in a damaged condition, may be assessed the cost of the material.
- D. The Corporate Education and Performance Department will monitor library contents on a regular basis.

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Section: Education and Performance	Number: 90.007A Page: 1 of 2
	Issue Date: 7/17/2003
Procedure: Tuition Payment	Revision Date: 10/18/05
	Approval: 

I. Purpose

To encourage associates to further their education in subjects which are related to their current jobs, a promotional opportunity or Company related field.

II. Policy


The Company will pay for the cost of an approved course at an accredited Higher Education College or University which can be of direct benefit to the organization. Payment cost includes tuition, required books and lab fees. Eligible associates must have completed at least 180 days of continuous service before being allowed to participate in the program. The maximum benefit for a full-time associate is \$3,000 per fiscal year, and the maximum is \$1,500 for associates that work more than 20 hours per week but do not work sufficient hours to qualify for full-time status.

Distance Learning or Correspondence courses can be requested if offered through an accredited educational institution. These courses should be completed six months from the date of registration.

III. Practice


- A. Class attendance and completion of study assignments shall be accomplished outside of the associate's regular working hours. Time spent in class, or studying, will not be considered as time worked for pay purposes. Travel will not be paid (mileage, meals hotels, etc.) Any courses taken without prior approval will not be considered for payment.
- B. The associate will be required to complete and sign a Withholding Authorization form authorizing the Company to deduct from the associate's future pay checks any cost incurred by the Company should the associate fail to meet requirements of this policy.
- C. Associates who are enrolled in courses are required to achieve a passing grade of a "C" or better, and provide proof of final grade within 15 days of receipt of grades.
- D. If an associate withdraws from school or a course, the associate is required to notify the Education and Performance Department in writing immediately.

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- E. The amount due to be paid back to the Company will be deducted from the associates paycheck in increments of no less than \$25 per pay period to repay all costs incurred by the Company.
- F. Any debts owed to the school, other than those paid for by the Education and Performance Department, must be paid prior to enrolling for the next course.
- G. If an associate's employment is discontinued for any reason, unless initiated by the Company, all tuition paid six months prior to the associate's last day of employment, at the Company's option, may be deducted from the associate's final paycheck.
- H. Associate must have demonstrated an overall minimum performance rating of "meets standards" on their most recent performance evaluation, have acceptable attendance as determined by their Department Head, and have no written counseling notices 3 months prior to paperwork submission.
- I. Payment to the college or university will be made after any scholarships or grant monies are applied and upon receipt of a detailed invoice. The tuition payment is coordinated through the Education and Performance Department.

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Section: Education and Performance	Number: 90.010 Page: 1 of 3
	Issue Date: 7/17/2003
Procedure: Compulsive Gambling	Revision Date:
	Approval: 

I. Purpose

To define the Company's position as it relates to compulsive gaming behavior and its support of responsible gaming behavior throughout the organization.

II. Policy

We believe problem gambling is a serious issue and deserves a proactive response from the casino industry. We are committed to providing human and financial resources to promote education and awareness of any problem gambling to our guests and associates.


The Corporate Commission and its gaming entities are committed to taking a leadership role on the issue of problem gambling. It is our goal as an entertainment industry to promote and support responsible gambling behavior. We believe that it is our responsibility to be sensitive to our associates, guests and host communities by proactively addressing any problem gambling issues.

We define problem gambling as any gambling behavior that negatively impacts the lives of individuals, resulting in serious personal, financial or legal consequences. Problem gambling takes two major forms: compulsive gambling and underage gambling, which affect both guests and associates. The Company shall commit to the prevention of underage gambling of all kinds per the Tribal-State compact and shall manage and conduct its activities in a manner which recognizes the necessity of programs and policies that address this problem.

III. Practice

- A. The Problem Gambling Prevention Program, established by the Mille Lacs Band of Ojibwe, consists of the following elements:
- Referral system,
 - Associate Education and Training,
 - Guest information,
 - Exclusion.
- B. The Corporate Director of Education and Performance, in consultation with the Corporate Senior Vice President of Gaming and Business Operations, shall

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develop and update as necessary the Problem Gambling Prevention Program. The Corporate Senior Vice President of Gaming and Business Operations shall ensure program implementation in all its gaming entities.


- C. The referral system of the Problem Gambling Prevention Program shall be based on a current directory of reputable organizations and individuals that provide assistance and resources for individuals with identified gambling problems.
- D. The Company will provide on-going training and education of selected Key Associates with an appropriate awareness of problem gambling and related policies. The Problem Gambling Prevention training shall be provided to all Casino associates who have regular contact with Guests. The training program is provided as part of the Associate Orientation program and requires annual in-service refreshers, including but not limited to the following:
- A description of the Problem Gambling Prevention program;
 - The nature, extent and effects of compulsive gambling;
 - How to recognize the warning signs of potential and actual gambling problems;
 - Techniques and the process for intervening constructively with identified problem gamblers; and
 - Identification of underage Guests on the gaming floor.
- E. The Company will provide resources to Guests on the Problem Gambling Prevention program by use of visible signage and through promotional materials as follows:

Signs. Signs that clearly and in plain language inform Guests about how to obtain assistance in dealing with gambling problems. These signs shall be prominently posted at the following locations within the casinos:

- At each entrance and exit;
- At any check cashing facility;
- Near any ATM cash machines; and
- Any other locations as determined by the Corporate Senior Vice President of Gaming and Business Operations.

Promotional Material. The Problem Gambling Prevention Program shall contain guidelines and suggestions for including messages about responsible gambling and resources for problem gambling behavior. The Corporate Senior Vice

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President of Gaming and Business Operations will monitor the promotional materials and advertising/marketing campaigns of each gaming entity to ensure that such messages are being included to the extent appropriate. This promotional material shall be prominently located at the following locations within the casino:

- At Guest Services;
- At main brochure racks on the gaming floor; and
- Any other locations as determined by the Corporate Senior Vice President of Gaming and Business Operations.

- F. A Guest's name may be added to an exclusion list established by the gaming entity. Exclusion can occur at the request of a Guest who states that he or she may have a gambling problem; at the request of the gaming entity for cause; or at the request of a household family member of a Guest (after a completed due-diligence investigation by the Vice President/Director of Security) who alleges that the Guest has a gambling problem. All requests shall be in writing and submitted to the Vice President/Director of Security and a copy to the Director of the Mille Lacs Band Gaming Authority.
- G. The Company may participate in local, state, regional and national programs designated to help alleviate problem gambling and contribute funds to agencies that assess the prevalence and address the treatment of gambling disorders.
- H. The Corporate Commission and its gaming entities may participate in industry-wide programs and initiatives to increase awareness and ensure that accurate information is placed in the public domain.
- I. The Corporate Commission and its gaming entities shall work in cooperation with social agencies and governmental authorities on matters related to this issue.
- J. The Corporate Internal Audit Department shall be required to perform periodic audits to ensure that signs are posted, as required, and promotional materials are available to Guests and associates. Deficiencies will be reported to the Casino management for correction.