

## CORPORATE COMMISSION of the Mille Lacs Band of Ojibwe Indians

# CORPORATE ORDER #0513.1 OF THE CORPORATE COMMISSION OF THE MILLE LACS BAND OF OJIBWE INDIANS

The undersigned, as Commissioner of Corporate Affairs of the Corporate Commission of the Mille Lacs Band of Ojibwe Indians, a Corporate Body Politic (the "Commission"), hereby adopts the following Commissioner Order effective this 15<sup>th</sup> day of May, 2013.

WHEREAS, the Commissioner of Corporate Affairs shall issue regulations and other directives in the form of Commissioner Orders to accomplish the Commissioner's corporate duties and responsibilities; and

WHEREAS, the Commission wishes to guard against actual or perceived collusion by Associates of the Gaming Enterprises; and,

WHEREAS, the Commission also wishes to allow Associates to gamble at a Commission Gaming Enterprise other than the one for which they work; and,

**WHEREAS**, the Commission, in order to clarify the existing policy, wishes to amend policy #24.007-"Associate Gambling" as follows:

- Part II-Add the following paragraph, "Company Associates, with the exception of the above list, may game at a Company Property at which they do not work. Non gaming operations (NGO) Associates may game at any casino property location."
- Part III-Remove the following sentence, "In the case of associates that do not work at a Company Gaming Property, the associate may not play these games at the Company Gaming Property that is closest to their work station."

**NOW THEREFORE BE IT ORDERED**, that until or unless superseded or amended, Policy #24.007 is hereby amended.

IT IS SO ORDERED,

Joseph S. Nayquonabe

Commissioner of Corporate Affairs

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

Section:	<b>Number</b> : 24.007 <b>Page</b> : 1 of 2
Human Resource – Benefits	<b>Issue Date:</b> 12/01/92
Procedure:	<b>Revision Date:</b> 5/14/2013
Associate Gambling	Approval:

#### I. Purpose

To state the guidelines by which an associate can participate in gaming activities at a Company property.

#### II. Policy

The Commissioner of Corporate Affairs, all Vice Presidents, Directors Managers, Department heads, and other associates at the grade E10 level or above, associates employed in the Corporate Commission Gaming Group, associates employed in the Corporate Commission Legal department; associates employed in the Information Technology department, and associates employed in the Marketing department are prohibited from gaming at any Company location.

Company Associates, with the exception of the above list, may game at a Company Property at which they do not work. Non gaming operations (NGO) Associates may game at any casino property location.

#### III. Practice

Eligible associates must adhere to the following rules and restrictions when participating in gaming activities.

- A. Associates participating in any gaming activities may do so only when they are considered off duty; this includes Associates on approved FMLA, Personal Leave of Absence or PTO. Furthermore, associates shall not game within thirty (30) minutes of the start or conclusion of their work day.
- B. No Grand Casino sponsored coupons may be redeemed. Coupons sponsored by the Mille Lacs Band may be accepted.
- C. Associates shall not join the players club.
- D. Associates shall not wear any clothing that identifies them as an associate of the Company while gambling. This shall include name tags and ID badges.
- E. Associates may play Bingo, Pull Tabs and Class II Card Games (i.e. Bad Beat Jackpot etc.) at any Company Property.

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- F. Associates may only play Slots and Class III Table Games at a Company Property at which they do not work.
- G. Associates must conduct themselves in a professional, courteous manner while gambling. Any associate, who exhibits behavior which reflects negatively upon the Company, shall be asked to leave the casino and may be subject to disciplinary action up to and including separation.
- H. Associates may not gamble on progressive slot machines that have a jackpot of \$25,000 or more.
- I. The Commissioner of Corporate Affairs, all Vice Presidents, Directors, Managers, Department Heads, Associates at the E10 level or above and any associate assigned to the Marketing Department are prohibited from accepting prizes, tips, gifts, or any form or remuneration, whether free or from a participation fee (i.e. raffle), from events sponsored in whole or in part by the company. This prohibition does not apply to events or promotions held specifically for associates.
- J. Note: Commissioner of Corporate Affairs reserves the right to change or modify this policy at any time.