



**MILLE LACS CORPORATE VENTURES
COMMISSIONERS ORDER #1503.1**

The undersigned, as Commissioner of Corporate Affairs of Mille Lacs Corporate Ventures, a Corporate Body Politic ("MLCV"), hereby adopts the following Commissioner Order effective this 14 day of March, 2015.

WHEREAS, pursuant to 16 MLBSA § 6 the Commissioner of Corporate Affairs is authorized to issue regulations and other directives in the form of Commissioner Orders to accomplish the Commissioner's corporate duties and responsibilities; and

WHEREAS, MLCV adopted a Policy #20.006-1 Corporate Non-Gaming Suitability Standards policy ("Suitability Policy") in order to provide guidance to those persons within MLCV, and/or any of its non-gaming subsidiaries, responsible for hiring, and in order to protect its guests, customers, associates and the public from negligent hiring; and,

WHEREAS, MLCV has found the Suitability Policy unduly restrictive and an impediment to staffing of our non-gaming subsidiaries; and

WHEREAS, MLCV, in order to clarify and update the Suitability Policy to better serve its business purposes, wishes to adopt the revised policy attached hereto as "Exhibit A."

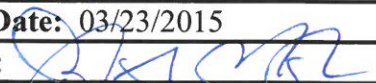
NOW THEREFORE BE IT ORDERED, that Policy # 20.006-1 is hereby superseded and replaced with that document attached hereto as Exhibit A.

IT IS SO ORDERED,

A handwritten signature in blue ink, appearing to read "Joseph S. Nayquonabe", is written over a horizontal line.

Joseph S. Nayquonabe
Commissioner of Corporate Affairs

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Policy and Practice Manual**

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	Approval: 

I. Purpose

To provide guidance to those persons within Mille Lacs Corporate Ventures, and any of its non-gaming subsidiaries (the “Company”), who are responsible for recruitment and selection of Associates via the establishment of a suitability standard.

II. Policy

Those persons within the Company responsible for the recruitment and selection of applicants shall apply the following suitability standards in order to protect our guests, customers, the public and fellow Associates from negligent hiring.

III. Practice

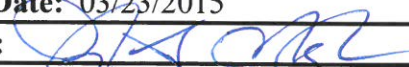
A. Background Investigations

1. **Investigation Required.** Each person who applies for employment with the Company or participates in a job training program with the Company and who is not required to obtain a license through the Mille Lacs Band Gaming Regulatory Authority shall be subject to a background review prior to employment.
2. **Juvenile Convictions.** The Company shall not consider the juvenile criminal history of any applicant, unless the applicant was charged as an adult and the charges were so adjudicated, or the behavior was so recent that the Company, in its discretion, determines that the person may still pose a suitability risk for employment.

B. Employment Prohibited. The Company shall not employ anyone who poses a threat to the financial well-being of the Company, or poses a threat to the public interest, safety or welfare of the Company or any of its guests or Associates, or the Mille Lacs Band of Ojibwe including anyone who:

1. has been convicted of a felony or gross misdemeanor within the previous one (1) year (excluding DUI/DWI/OWI);
2. has been released from a significant period of incarceration (defined as more than 30 days) within the previous one (1) year;
3. has ever been convicted of, or has charges pending for, the following types of crimes:
 - a) theft, fraud or misrepresentation of any kind, including but not limited to theft by fraud, worthless checks, auto theft, welfare fraud, falsification of documents, false identification, etc. or:

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- b) criminal sexual conduct,
- c) any other crime that the Company determines, in its sole discretion, poses an unacceptable risk to the public interest, safety or welfare of the Company or any of its guests or Associates, or the Mille Lacs Band of Ojibwe.

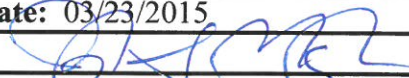
C. Duty to Report

1. Both Non-Gaming License Applicants and Associates shall have a duty to report any charges to their supervisor (excluding traffic-related misdemeanors) filed against them within five (5) business days after the individual becomes aware that they have been charged with an offense. The supervisor so notified shall report the relevant information to the appropriate HR. Failure to report such information shall constitute separate and sufficient grounds to deny or separate employment.

D. Board of Appeals

1. Any person denied employment pursuant to this Policy may within ten (10) calendar days of written receipt of a negative hire determination file a written appeal of such decision to the Board of Appeals.
2. The Board of Appeals shall consist of the Corporate Vice President of Human Resources/Talent or their designee and the Corporate Attorney.
3. The Board of Appeals shall meet to consider all appeals on a date agreed upon between the Board and the appellant, but in no case later than thirty (30) calendar days after receiving the written request for an appeal hearing.
4. The applicant shall at all times bear the burden of proving sufficient rehabilitation and current fitness for employment. The Board may consider some or all of the following in determining whether such burden has been met:
 - a) The applicants testimony regarding the incident/s in question and any subsequent efforts at rehabilitation or restitution;
 - b) Any recommendations submitted on behalf of the applicant.
 - c) The applicants prior employment history.
 - d) Any other factors the Board of Appeals determines, in its sole discretion, relevant to the recommendation.

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These criteria described above shall be considered guidelines only. Nothing in this section may be construed to require the Board of Appeals to recommend a waiver or to require the Company to actually hire or continue employing any individual.

5. The Board of Appeals shall issue a written recommendation to the Commissioner of Corporate Affairs within one (1) week of the appeal hearing. The Commissioner's written decision, either approving or denying the recommendation, shall be final for a period of one (1) calendar year from issue. After such time, the appellant may re-file an appeal not more frequently than once per calendar year.

E. Effective Date

1. This policy shall not apply retroactively to any associate of the Company, but shall be effective as of the date of its adoption.