



## Universal Gaming Group Pandemic Resumption Plan

Universal Gaming Group (“UGG”) is committed to the safety and health of its employees, partner establishments and video gaming patrons. In order to comply with the Illinois Gaming Board (“IGB”) protocols for the resumption of video gaming (“VG”) operations, UGG has begun to implement the following plans and procedures with the goal of safely resuming operations upon the commencement of Phase 4 under Governor Pritzker’s “Restore Illinois” plan. Upon entering Phase 5 of the plan, UGG will begin to scale back on some of these plans and procedures, however not until Phase 5 is reached and the public health crisis is abated. UGG looks forward to working with the IGB, IDPH and its licensed establishments (“LEs”) to ensure a return to a safe and fair operating environment.

### 1. Reopening Procedures and Waiver Requests

Prior to the resumption of VG operations, UGG will begin to implement several new procedures, both within its two operations facilities and in coordination with its partner LEs. From a regulatory standpoint, UGG will ensure the prompt payment of any and all obligations due to the IGB for terminal handler fees and video gaming terminal annual fees, and remind its partner LEs of their obligations to remit applicable location license fees. Additionally, UGG is in communication with the various municipal entities in which it operates to ensure the prompt payment of local video gaming fees where applicable.

At present, UGG does not intend to request any regulatory waivers from IGB, however UGG will immediately inform IGB staff of any unforeseen circumstances which may arise.

All UGG staff will be provided with a copy of this resumption plan and the IGB Protocols for the Resumption of Video Gaming Operations. Staff will be instructed on the new procedures described herein and will be advised to report all failings or noncompliance to the Pandemic Liaison. Furthermore, UGG staff and partner LEs will be provided with specific training on sanitization techniques for video gaming equipment, guidance from IDPH regarding proper sanitization of work areas and hygiene, along with applicable CDC guidance pertaining to COVID-19 prevention and mitigation as practical. Upon the resumption of field operations, UGG field staff will begin to repair VGTs which have been disconnected from the SG system and reestablish communications with

disconnected site controllers. Additionally, UGG staff will execute “deep cleanings” of all VGTs and Redemption Terminals, sanitization of gaming chairs, and sanitization of other surfaces in VG areas.

2. *Social Distancing Requirements*

a. *Ingress and Egress to Video Gaming Areas*

Individual VG areas will be evaluated to determine the measures which will be required to enforce social distancing upon ingress and egress to VG areas. Most locations will be able to accommodate “one-way” entry and exit of VG areas, with applicable signage and floor decals posted where feasible.

b. *VGTs During Play*

VGTs which are not spaced six feet apart will be separated by clear, polycarbonate dividers where space provides. Locations which will not accommodate the installation of dividers will require certain VGTs to be disabled until such time that the VG area can be relocated. Chairs will only be provided for VGTs which remain in operation in order to further enforce social distancing requirements.

c. *Waiting Areas*

LEs will be advised to enforce social distancing guidelines in any designated waiting area outside of VG areas. UGG will make floor decals available upon request by LEs to assist with maintaining social distancing between waiting patrons.

d. *Gaming Area Surrounding the VGTs*

LEs will be advised to permit only those who will be playing VGTs to enter VG areas. No other patrons should be permitted entry to VG areas if all active VGTs are in use.

e. *Tables and Seating Areas in the Gaming Area*

LEs will be advised to temporarily remove all excess seating and/or tables within current VG areas. Only those who are actively utilizing VGTs will be permitted access to the VG areas

f. *Redemption Terminals*

Where feasible, Redemption Terminals may be moved from the current VG areas to ensure a safe distance between players and those wishing to redeem vouchers. Dividers will be installed adjacent to redemption terminals where relocation is not an option. Where applicable, floor decals may be placed to ensure distance between those utilizing the Redemption Terminal and those who are waiting.

g. *Accommodation and Protection of Employees with Compromised Immune Systems*

UGG will advise all employees and partner LEs of the risks associated with COVID-19, especially those risks which pertain to individuals with underlying

health issues. UGG will ensure that all internal employees are advised of their rights under the ADA and will advise partner LEs to do the same. Should a UGG employee belong to a high-risk group, that employee will be advised to work from home until it is safe to return to work.

- h. *Procedures for Responding to Establishments and/or Patrons who do not comply with social distancing requirements*

UGG field staff will be instructed to report all incidences of noncompliance with this Resumption Plan and the IGB Protocols for the Resumption of Video Gaming Operations to the Pandemic Liaison. Should qualified instances of noncompliance discovered, the Pandemic Liaison will report these instances to IGB staff. LEs will be encouraged to enforce compliance with this plan and report any noncompliance to the UGG Pandemic Liaison or the IGB.

### 3. Personal Protective Equipment (“PPE”)

- a. *Distribution and availability of face masks and other appropriate PPE to patrons and Employees*

UGG will provide face masks, gloves, and a supply of personal sanitizer to all of its field staff. Within its facilities, UGG will make hand sanitizer readily available to all office staff and provide masks for use while staff is in common areas. UGG will provide an initial supply of face masks and hand sanitizer to its partner LEs prior to the resumption of operations. Furthermore, UGG will advise its partner LEs to make face masks and hand sanitizer available to patrons and LE staff.

- b. *PPE Use Requirements for Patrons and Employees, Including Exceptions and Procedures for Identity Verification and Surveillance Purposes*

LEs will be advised of their continuing duty to require the use of face masks while patrons are indoors. UGG will assist LEs with posting signage at the entrance of each VG area, instructing patrons to check in with LE staff and present ID prior to occupying a VGT for play.

- c. *Procedures for responding to patrons and LEs who refuse to comply with PPE requirements*

UGG field staff will be provided with an electronic checklist to be completed upon every visit and instructed to report all incidences of noncompliance with this Resumption Plan and the IGB Protocols for the Resumption of Video Gaming Operations to the Pandemic Liaison. Should instances of noncompliance be discovered, the Pandemic Liaison will report these instances to IGB staff.

Reports of such instances will include the approximate date and time, license number of the location, a brief narrative of the situation and any names able to be gathered.

- d. *Procedures for proper and safe disposal of used PPE*

UGG will make separate receptacles available at its two facilities for the disposal of used PPE. Only gloved employees will be permitted to dispose of used PPE in sealed garbage bags, and all used PPE will be disposed of on a daily basis. LEs will be advised to follow the same procedures.

*e. Requirement that all patrons and employees have some type of face covering*  
UGG field staff will be required to don face coverings while working within LEs and UGG office staff will be required to wear masks while in common areas of UGG's two facilities. UGG will also make door signage available to LEs to notify patrons of face covering requirements prior to entering the locations.

*f. Steps taken to ensure an adequate PPE supply chain including how the PPE is obtained/stored*

UGG is currently working with multiple suppliers to ensure the prompt delivery and resupply of PPE, along with initial supplies for UGG's partner LEs. Should stock run low at one supplier, UGG hopes to be able to rapidly procure resupply from a backup supplier.

*g. Specify the number of days the supply must be stored and the minimum PPE storage reserves that will be maintained (in days).*

UGG intends to maintain a twenty-day supply of PPE at its two facilities and will order resupply every ten (10) business days. Unused PPE will be discarded sixty days after receipt.

#### *4. Cleaning, Disinfecting and Sanitizing*

UGG will have both of its facilities professionally cleaned and sanitized prior to reopening. In addition, UGG office staff will be encouraged to stagger the times they occupy the facilities and work remotely when able. The two facilities will be placed on a more frequent cleaning schedule than was in place prior to the shutdown of operations. All video gaming equipment will be "deep cleaned" and sanitized by UGG on a 30-day schedule, in addition to regular exterior cleaning by UGG and LE staff. UGG will provide an initial supply of hand sanitizer, disinfectant wipes, cleaning solution and associated equipment to all its LEs, along with a recurring supply of disinfectant wipes for the VG equipment.

- a. VGTs will be "deep cleaned" on a thirty-day schedule by UGG staff. Deep cleanings will consist of the sanitization of all exterior surfaces, cleaning and vacuuming of internal filters, dust abatement and sanitization of associated VG equipment such as chairs and bases.
- b. VGT partitions will be thoroughly wiped down by UGG collection and service teams upon every visit to LEs. LEs will be advised to wipe down VGT partitions periodically throughout, and at the end of every business day. LEs will be encouraged to sanitize chairs after each use.

- c. Other frequently touched surfaces within VG areas will be sanitized upon scheduled “deep cleanings.” LEs will be advised to regularly sanitize these surfaces, with daily sanitization as the minimum, however sanitization after every patron use will be encouraged.
  - d. Chairs within the VG areas will be wiped down and sanitized by UGG collection and service teams upon every visit to LEs. LEs will be advised to sanitize each chair after every use by a patron.
  - e. Redemption Terminals and ATMs will be thoroughly wiped down by UGG collection and service teams upon every visit to LEs. LEs will be encouraged to wipe down Redemption Terminals and ATMs after every use.
5. Signage  
UGG will post signage at the entrances, interiors and exits of every VG area, notifying patrons of the policies in place prior to utilizing a VGT. Signage will remind patrons of their requirements to wear face masks while inside LEs and encourage patrons to sanitize their hands prior to and after VGT use. Signage will instruct patrons to check in with LE staff prior to VGT use. Samples of signage which is to be posted is attached to this plan as Exhibit A. Signs which will be available upon request are attached to this plan as Exhibit B.
6. Capacity and Occupancy  
LEs will be advised of current DCEO capacity and occupancy limits. Additionally, LEs will be advised of best practices to ensure CDC social distancing guidelines and IDPH requirements and advised when CDC, IDPH and DCEO guidance changes.
7. Daily Health Screening  
UGG will conduct the screenings on a non-discriminatory basis and will treat employee responses as confidential medical records in strict compliance with the Americans with Disabilities Act, as applicable. Any information regarding employee illness will be stored separately from the employee’s personnel file. UGG reserves the right to bar access to UGG facilities if an employee refuses to cooperate. UGG will encourage LEs to implement a similar policy.
8. Training
  - a. Proper use and disposal of PPE  
UGG employees will be trained on the proper wear of face masks, the appropriate wear and removal of disposable gloves, and given instruction on the new requirements. UGG will make separate receptacles available at its two facilities for the disposal of used PPE. Only gloved employees will be permitted to dispose

of used PPE in sealed garbage bags, and all used PPE will be disposed of on a daily basis. LEs will be advised to follow the same procedures.

*b. Social distancing guidelines and COVID-19 exposure mitigation strategies, including hand washing and to stay home if feeling sick*

UGG has implemented several internal policies to mitigate the risk of COVID-19 transmission at its two facilities and will continue to instruct field personnel on mitigation techniques while performing job functions in UGG partner LEs.

Office staff has been advised to-

- i. Telework when feasible.
- ii. Implement Social Distancing measures by:
  1. Increasing physical space between themselves, other staff members and LE patrons/employees, along with encouraging the closing of office doors while working in UGG facilities
  2. Staggering work schedules for all who are required to report to UGG facilities
  3. Decreasing social contacts in the workplace by limiting the number of personnel in common areas at one time
  4. Halting all visits to UGG facilities by non-UGG personnel
- iii. Ceasing non-essential business travel

Signs have also been posted in UGG facility common areas to remind staff to regularly wash their hands and to stay home if they are feeling ill.

*c. Recognition of possible COVID-19 symptoms*

UGG shall issue CDC/IDPH literature to all staff and LEs regarding the identification of possible COVID-19 symptoms and provide instruction on the same. A sample of the literature which will be made available to UGG and LE staff is attached as Exhibit C.

*d. Procedures for reporting possible COVID-19 exposure*

UGG staff will be instructed to immediately report the possibility of COVID-19 exposure to the Pandemic Liaison. Upon receiving a report of possible COVID-19 exposure, the Pandemic Liaison will-

- i. Instruct the employee to immediately return home and self-isolate
- ii. Arrange for the employee to receive a COVID-19 test at the facility most convenient to the employee, at no cost to the employee
- iii. Trace and document the employee's contacts with UGG staff and visits to LEs for the prior seven days
- iv. Not allow for employees to return to work until a negative diagnosis is returned
- v. Report the possible exposure to IDPH where applicable

*e. Procedures for responding to patrons and LEs who refuse to comply with social distancing and PPE requirements*

UGG field staff will be instructed to report all incidences of noncompliance with this Resumption Plan and the IGB Protocols for the Resumption of Video Gaming Operations to the Pandemic Liaison. The Pandemic Liaison will investigate each instance and interview UGG and LE staff as applicable. Should qualified instances of noncompliance be discovered, the Pandemic Liaison will report these instances to IGB staff. Reports of such instances will include the approximate date and time, license number of the location, a brief narrative of the situation and any names and contact information able to be gathered.

*f. Procedures for accommodation and protection of employees with compromised immune systems*

UGG staff will be advised of their rights under the ADA to request reasonable accommodation due to possible preexisting health conditions and/or compromised immune systems which place them at high-risk for complications stemming from COVID-19 infection. Staff will be instructed to submit confidential requests for accommodation through the Pandemic Liaison. Such requests will include recommendations for the accommodation sought and will be periodically reviewed with the requesting employee as the public health situation evolves.

*g. Compliance with the Resumption Plan*

All UGG employees will be provided with a copy of this plan, instructed on their responsibility to comply, and asked to sign a statement of receipt and acknowledgement. Signed statements will be maintained in employees' personnel files. Employees will be advised that failure or refusal to comply with this plan and the IGB's Protocols for Resumption of Video Gaming Operations will result in adverse action taken by the company and a noncompliance report to IGB.

*h. Proper use and disposal of cleaning, disinfecting and sanitizing products*

Employees will be instructed on the proper use and disposal of cleaning, disinfecting and sanitizing products in accordance to each product's instruction label and/or Safety Data Sheet (SDS).

*9. Monitoring and Reporting*

The Pandemic Liaison will coordinate with all department managers regarding the monitoring of employee compliance with this Resumption Plan. Instances of noncompliance will be documented by the appropriate manager and forwarded to the Pandemic Liaison for investigation. Any qualified finding of noncompliance will be documented and reported to appropriate IGB and IDPH personnel.

Corrective training and additional instruction will be mandated for all employees found to be in noncompliance and repeated instances of noncompliance will result in adverse action, up to and including termination of the violative employee.

UGG collection, field service and account management teams will be instructed to report instances of LE noncompliance to the Pandemic Liaison for investigation. Upon



substantiated findings of noncompliance, the Pandemic Liaison will forward a report to appropriate IGB and IDPH personnel. The report will include-

- i. The approximate date and time of the instance
- ii. The license number of the LE at which the instance took place
- iii. Names and contact information of personnel who witnessed the instance
- iv. A brief narrative of the incident

Identified cases of COVID-19 infection will be immediately reported to IDPH and the applicable county health department by the Pandemic Liaison. The Pandemic Liaison will report the identity of the infected individual, last known locations of contact for the previous seven days and any other reasonable information requested by IDPH and county health officials. The Pandemic Liaison will reasonably assist contact tracing authorities with investigation upon request. LEs will be encouraged to report two or more confirmed employee or patron cases to the applicable local health department.