



**Fraser Downs at Elements Casino Surrey
Protocols for the 2020/2021 Live Racing Season**

COVID-19 Live Racing Safety Protocols

Effective September 10, 2020 and until further notice

Fraser Downs at Elements Casino Surrey (“**Fraser Downs**”) and Great Canadian Gaming Corporation (“**GCGC**” or the “**Company**”, the parent company of Elements Casino Surrey), in conjunction with Harness Racing British Columbia (“**HRBC**”), are committed to keeping all racing participants and workers safe and healthy. In order to conduct live racing operations, below are the protocols that will be implemented to prevent and control the spread of COVID-19 on Company property. These items will apply to all persons who will be required for the live racing season at Fraser Downs:

- a. To limit the congregation of crowds and maintain physical distancing, there will be no access to the Frontside and Backstretch areas, except for specific racing participants and GCGC team members, as deemed necessary. To be clear, this means that the public will not be allowed in any area of the facility under the current health authority orders.

Only one (1) Trainer, one (1) groom and one (1) owner per horse are allowed into the Backstretch during Live Racing, for their horse(s) race. Physical distancing of two (2) meters must be maintained by each trainer and groom, organized sequentially by the horse number that has been entered in a race.

- b. Access to the backstretch will only be through the North Gate adjacent to the Horsemen’s parking lot (must be strictly observed) and will be limited to essential personnel licensed by the Gaming Policy and Enforcement Branch (“**GPEB**”) including:

- Trainers
- Grooms
- Drivers
- Blacksmiths
- Veterinarians, Assistants and Technicians
- Ambulance Personnel
- GPEB Officials
- Out Riders
- Driver Agents
- GCGC Preauthorized Representatives
- GCGC Management personnel
- Elements Casino Surrey Employees
- CPMA Officials
- Chief Test and Test Inspectors
- Race Secretary
- Track Crew
- Photographer
- Starter
- Standardbred Canada field representative
- Paddock Judges
- Horse Identifier
- Farriers
- Backstretch Restaurant Staff

In addition, breed association management and other support personnel with names provided to GCGC by the breed associations in advance.

- c. Access to Fraser Downs Frontside area will be limited to the following areas as it relates to racing:
- Rooftop Operations including Announcer, On Track Productions, Charter, Timer, Runner, Judges, Tote Staff, GPEB Directors and GPEB inspectors. Elevator posted maximum occupancy and direction of travel in stairwells must always be observed.
 - GCGC Management, Facilities and janitorial personnel.
 - Security, Surveillance, Human Resources or General Manager approved person(s).
- d. To ensure contact tracing can be completed by the provincial authority in the event of a confirmed case, anyone accessing the backstretch through the North Gate will be required to provide personal identification. Individuals will be required to provide their first name, last name, contact phone number or email address. Personal information is collected and secured in accordance with applicable privacy laws and will be destroyed after 30 days. The information provided by an individual will be used solely for contact tracing purposes and will not be disclosed to third parties unless authorized under applicable privacy laws. Gate security will note the entry and exit times by way of a written record keeping system by using a list of essential licensed personnel supplied from the Race Office. Individuals associated with HRBC, GPEB and other personnel as approved by the General Manager will also be tracked. If the individual is known to security as an essential person and requires access on a frequent basis (resident trainer, Drivers etc.), the security guard can simply tick off the requisite box in the daily column of the weekly written record keeping and waive the requirement to present personal identification at the gate. The license expiry dates for these individuals are tracked by GCGC.
- e. All participants and workers must always wear face coverings that meet the guidance provided by the Public Health Agency of Canada (“PHAC”): <https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/prevention-risks/about-non-medical-masks-face-coverings.html> and any specific provincial guidance supplied by the BC Centre for Disease Control and/or WorkSafeBC. Face coverings must completely and comfortably cover the nose and mouth without gaping. Bandanas are an acceptable form of face covering, if worn according to PHAC guidelines. Bandanas are discouraged from being worn if a racing participant will be on camera during live racing. Participants and workers are responsible for using, caring and cleaning their face covering in accordance with PHAC guidelines. Persons requesting access are required to bring their own face covering and anyone without a face covering will not be permitted entry. Any person found on track premises without wearing a face covering will be requested to leave the premises immediately. For more information regarding the appropriate use of face coverings, see: <https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/prevention-risks/about-non-medical-masks-face-coverings.html>

Exceptions to wearing face coverings at certain times while on the premises: Drivers will be allowed to lower their face covering into their colours immediately prior to exiting the mobile starting gate, in addition to trainers training in the morning. Outriders are required to wear face coverings at all times. Face coverings may be removed in single occupancy offices or private rooms. In addition, when eating, drinking, smoking, or performing physical labour if individuals

are greater than two (2) metres distance from each other or a physical barrier exists removing the face covering is permitted. Smoking is only permitted in designated areas.

- f. Before entering the backstretch at the North Gate, each person must follow the indicated screening and security measures in place. Currently, self/passive screening is in place with signage posted. This requires each participant and worker to ask themselves the following questions every time before entering the backstretch or buildings:
1. Are you sick/ ill and/or have you had any symptoms related to COVID-19?
 2. Have you had close contact with a confirmed case of COVID-19 in the past 14 days?
 3. Have you travelled outside of Canada (or as directed by the Public Health Office) within the past 14 days?
 4. Have you been instructed by federal or provincial health authorities to self-isolate due to travel or contact history?

If any person answers YES to ANY of the above questions, participants and workers must NOT enter the backstretch or any buildings. They are to contact a provincial health authority for further guidance and requirements. They should also contact their employer or immediate supervisor if they feel sick for further follow-up and instructions.

GCGC reserves the right to introduce additional public safety measures at any time for racing participants and workers if directed to do so by government or the Public Health Authority.

The Company has been and will continue to monitor information from workplace safety legislation, as well as federal and provincial health authorities, regarding measures that can be taken to control risks associated with COVID-19. GCGC has identified key touch points using checklists and addresses these risks through hand hygiene, education, ongoing communications and other measures to ensure those who are sick stay home. In addition to determining the risks and measures for prevention, GCGC has assessed interactions that occur at the workplace. Below is an inventory of anticipated interactions that have been identified for Fraser Downs. This list is not inclusive of all potential interactions but simply a highlight of regular and anticipated interactions.

Department	Interaction	Control in Place
Backstretch Restaurant (operated by third party)	Point of Sale (“POS”), Restaurant, Rest Rooms, Lounge	Physical distancing, floor markings, transparent plexiglass barrier @ POS, signage, face coverings. Operated and all protocols responsible by a third party (Debra Dalton)
HRBC Office	Offices, Boardroom	Physical distancing, floor markings, signage, possible barriers, face coverings.

Department	Interaction	Control in Place
Drivers' Room (when applicable)	Showers, Locker Area, Change Room	Physical distancing, floor markings, signage, protocols in place, face coverings.
Restrooms	Restrooms	Physical distancing, signage, face coverings.
Veterinarian Trailer	Veterinarian Trailer	Physical distancing, floor markings, signage, face coverings.
Track Maintenance	Office, Lunchroom, Janitorial, Work- shop	Physical distancing, signage, face coverings.
Testing Barn	CPMA Office	Physical distancing, floor markings, signage, possible barrier, face coverings.
Race Office	Photocopier	Physical distancing, floor markings, signage, face coverings.
Race Office	Trainers & Horse Owners – Entries, Claims, Draws, GPEB interviews etc.	Floor markings, physical distancing, barrier, signage, face coverings.
Mobile Starting Gate	Mobile Gate Crew	Physical distancing, face coverings.
Paddock	Drivers, Grooms, Trainers	Physical distancing, signage, face coverings.
Rooftop Operations	Announcer Booth	Physical distancing, signage, face coverings.
Rooftop Operations	On Track Productions	Physical distancing, barrier, signage, face coverings.
Rooftop Operations	Timers	Physical distancing, signage, face coverings.
Rooftop Operations	Media, Judges	Physical distancing, signage, face coverings.
Backstretch Security	Testing Barn	Physical distancing, signage, protocols in place, face coverings.

Department	Interaction	Control in Place
Backstretch	First Aid Ambulance	Physical distancing, protocols in place, face coverings.
Backstretch	Access and I.D. check, Trespass & Patrols	Physical distancing, signage, protocols in place, enclosed booth at access gate, face coverings.
Winners Circle	Trainer/Driver/Photographer	Physical distancing, protocols in place, face coverings.
Rooftop Operations	Charter	Physical distancing, protocols in place, face coverings.
Barn F Paddock	Drug and Alcohol testing office	Physical distancing, protocols in place, face coverings.
Backstretch	Tack Shop	Physical distancing, signage, face coverings (operated by a third party)

Backstretch

- Only one (1) trainer; one (1) groom and one (1) owner per horse are allowed onto the backstretch area during live racing.
- The one (1) owner can arrive 15 minutes before their race and must leave immediately after the race.
- GCGC team members and essential personnel for horse racing in the backstretch will maintain physical distancing and face covering protocols.
- No guests or public, no exceptions, under the current health authority orders.
- No congregating of essential personnel in any areas.
- Only one (1) GCGC approved photographer is allowed onto the backstretch area for the purposes of taking the winning photo at the Winners Circle.
- The below provisions are in place with respect to access to the Rooftop Operations relating to live racing activities:
 - Rooftop Operations including Announcer, On Track Productions, Timers, Charter with Assistant, Runners, Judges, GPEB Directors and GPEB inspectors. Maximum occupancy numbers in elevators and direction of travel floor markings in stairwells must always be observed.

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- GCGC Management, Facilities and Janitorial personnel.
 - Security, Surveillance, Human Resources or any other individual who has been approved by the General Manager are permitted entry.

Racing Office

- The racing office will be limited to two (2) persons at a time.
- All essential personnel must follow the most current posted protocols.
- Essential personnel and Owners making claims must adhere to signage and floor markings, and are required to wear face coverings, while inside the Racing Office.
- Entry Day – Entries must be call in only whenever possible.
- Draws will be limited to Race Office personnel and witness only.

Mobile Starting Gate

- All mobile starting gates will be disinfected before the start of each racing day.
- The mobile starting gate crew must wear face coverings at all times.

Paddock/Post Parade on Track Surface

- Paddock is closed to everyone other than essential personnel who are required to accompany each horse to and from the racetrack.
- Grooms/Trainer will walk horses from the barn to the Paddock stall and will maintain position at head of horse.
- Grooms/Trainer will maintain physical distancing from opposite sides.
- Horses will maintain distance of at least two (2) metres while in Paddock area.
- Whenever possible, instructions be given by the trainer to the Driver via mobile phone or text before racing.
- All essential personnel must use face coverings while in the Backstretch/Barn/Paddock and the Track Surface.

Driver's Room

- **Drivers' Room will remain closed for the 2020/21 season or until such time as approved to reopen by the Racing Office.** Once reopened, all Drivers' Room areas will be cleaned frequently throughout the day and key touch points will be disinfected.
- Drivers and essential personnel are the only individuals who are permitted in the Drivers' Room.
- Drivers showing any signs of illness will be denied access to the Drivers' Room and property.
- Drivers showing any signs of illness after gaining entry to Fraser Downs will be asked to leave the property.
- Drivers will be spaced a minimum of the required two (2) metres from one another while in the Drivers' Room.

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- All Drivers will follow signage, floor markings, direction of travel floor markings and entrance/exit indicators.
 - Drivers are required to leave the Drivers Room immediately following their last drive.
 - The showers will remain open; posted capacity limits are to be followed.
 - Travel for Drivers will be restricted and a 14-day mandatory self-isolate (quarantine) is in effect for all drivers and essential personnel who have travelled internationally or as required by the Public Health Office. Any self-isolation (quarantine) will not occur at Fraser Downs.

Roof Top Operations

- Rooftop Operations will be limited to the Announcer, On Track Productions, Timer, Charter, Runner, Judges, GPEB inspectors, GPEB Directors, Facilities and Janitorial personnel and other personnel who have been approved by the General Manager. Maximum occupancy numbers in elevators and direction of travel floor markings in stairwells must always be observed.
- All Roof Top personnel must complete the COVID-19 access agreement waiver.
- Personnel must enter the building via the security entrance and adhere to all health and safety guidelines and GCGC's Corporate Ethics and Conduct Manual.

Backstretch Restaurant

- Essential personnel will be encouraged to carry out their food.
- Backstretch Restaurant inside seating will be limited and food and alcohol service will operate in accordance with provincial health authority orders and guidelines, [WorkSafeBC guidelines](#) and the third-party operators' COVID-19 safety plan.
- Tables will be limited to single occupancy or household "bubbles" based on provincial health authority orders and guidelines

Floor plans related to the Health and Safety hierarchy of controls for each specific backstretch area can be found in the separately available Fraser Downs Site-Specific COVID-19 Prevention and Control Plan.

g. Physical Distancing of two (2) metres is always required to be maintained except in certain circumstances where distancing is not practical. In those instances, added precautions will be taken such as:

- Transparent (plexiglass) barriers will be present in all offices with interaction, and security.
- Starting gate times to be minimized and Mobile Gate Crew to wear face coverings at all times.
- Limit of one (1) person per approved vehicle within the backstretch area. GCGC to approve as an exception in advance, a second person riding in the same vehicle. If an exception is granted, [preventative measures](#) will be in place as recommended by WorkSafeBC.

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- Specific Test Barn Protocols will follow all Canadian Pari-Mutuel Agency (or “CPMA,” the federal regulator for the conduct of live horse racing) mandated standards and procedures as outlined by the Federal Government.
 - Approved third-party contractors (Feed Suppliers, On Track, farriers, veterinarians, equipment supply etc.) to wear face coverings and abide and acknowledge all GCGC Code of Conduct and COVID-19 health and safety protocols.

It is important to consider that some participants may be within the same household or “bubble(s)” and it may be acceptable based on Public Health Authority direction, that some groups of people may be allowed to congregate together in certain settings within a two (2) metre distance. However, while at Fraser Downs, trainers and their employees within the same household are required to strictly maintain physical distancing requirements of two (2) metres, due to challenges associated with monitoring and public perception from others.

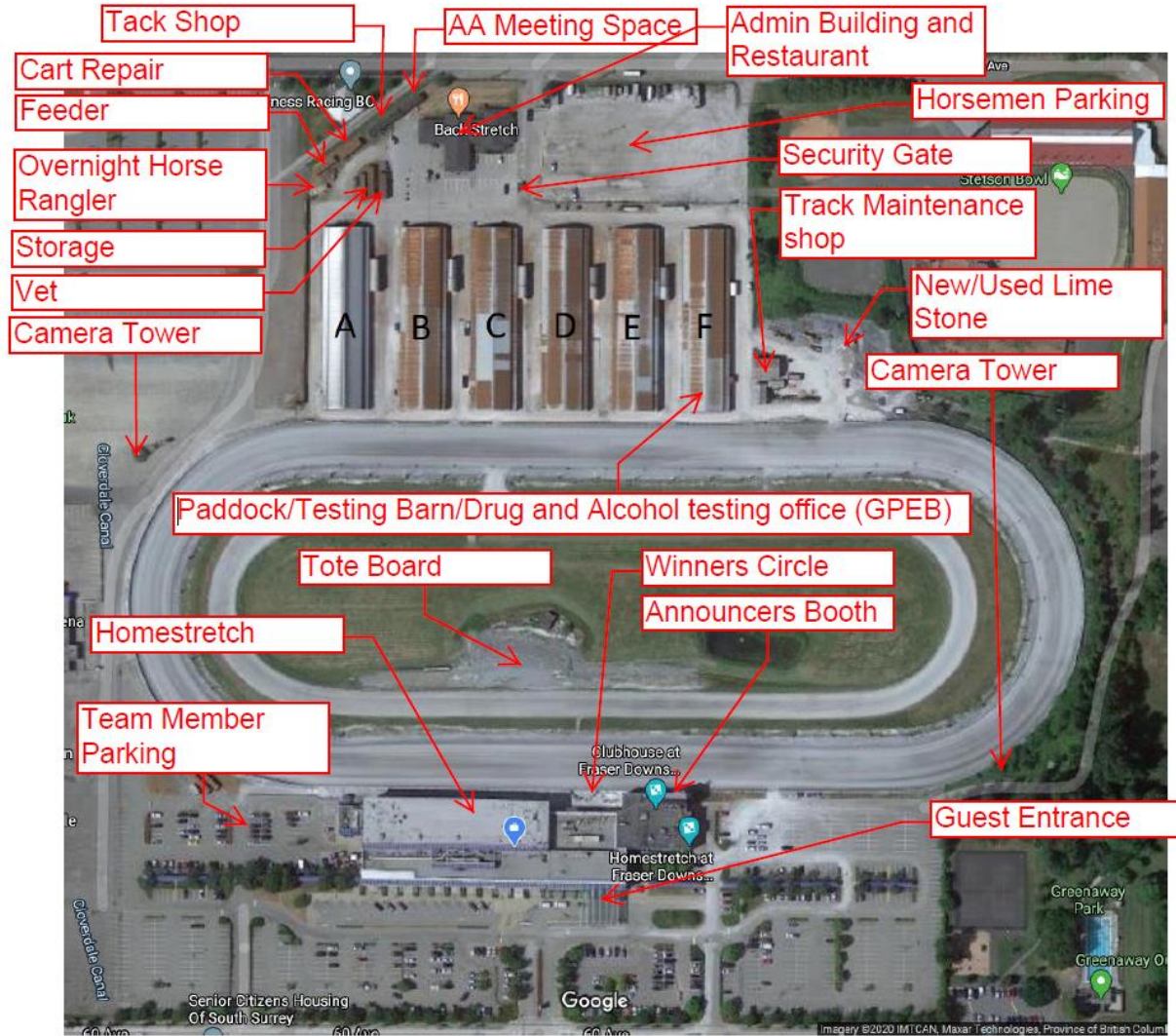
- h. Two (2) persons permitted per horse into the designated Paddock area, no exceptions, which means one (1) Trainer and one (1) Groom may accompany each entry to the Paddock. If an assistant is required to help walk an entry to the Paddock, the assistant must wait outside Barn F physically distanced at all times. Should a horse be difficult, or an additional person is required, the assistant may enter the Paddock area to help with the express consent of the Paddock Judge.
- i. Face coverings must be worn while inside the Race Office building. To limit exposure, the racing office will be limited to two (2) persons capacity at a time. All visitors must follow the most current posted protocols. Visitors must adhere to floor markings while inside the racing office. On entry day, Trainers are encouraged to call in the entries, whenever possible. Draws will be limited to Race Office personnel and a GPEB witness only. Further specifics and information relating to the revised business protocols and procedures of the Race Office, related Claims and Entries and the continued function of Horse Person’s Bookkeeper, can be obtained from Race Office personnel through Nichelle Milner, Racing Secretary, Fraser Downs.
- j. All races will be photographed at the wire. To obtain a copy of the photos, owners may make arrangements directly with the photographer.
- k. Hand washing and/or hand sanitizer stations and/or equipment are available to all persons at all touch point areas throughout the Frontside and Backstretch area. These are pre-existing handwashing stations for the most part, however additional hand sanitizer stations will be provided as required. If participants are wearing gloves for protection, they must be sanitized regularly. Disposable, single-use face coverings and vinyl or nitrile gloves must be disposed of in in a regular garbage bin; this information must be followed by all participants and workers. It is important to remember that COVID-19 does not absorb through your skin. Gloves are considered an extension of your hands and therefore offer limited protection. If an individual is wearing gloves, they must do safely and avoiding cross contamination. Do not touch your face with unwashed hands and do not touch your face with gloves. Gloves must be worn in accordance with information provided by workplace safety legislation.
- l. Enhanced cleaning and sanitization procedures, as well as disinfection of key touch points and equipment will be in place in the following Frontside and Backstretch areas, with responsibility allocated as follows:

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- The backstretch and associated roof top operations, mobile starting gate, Paddock, Race Office, Elements Casino Surrey team member areas and associated washrooms are Tornados responsibility and will be handled in accordance with Tornados contract terms and COVID-19 safety plan
 - Backstretch Restaurant, Driver’s rooms, barns, and associated washrooms are a joint responsibility with the HRBC
 - GPEB office will be the responsibility of GPEB
 - Test Barn are the responsibility of the GCGC, based on operations and testing procedural input from CPMA
- m. Fraser Downs and the HRBC will ensure that these requirements are communicated to its personnel and participants.
- GCGC and Fraser Downs will ensure all team members are appropriately trained and educated on all COVID-19 health and safety measures
 - HRBC is responsible to ensure all members adhere to these COVID-19 Safety Protocols
 - GPEB is responsible to both adhere to these COVID-19 Safety Protocols at all times and assist to enforce compliance with these Protocols along with GCGC Security and Surveillance
 - Tornado is responsible for ensuring that their team members, including janitorial crew, will adhere to these COVID-19 Safety Protocols

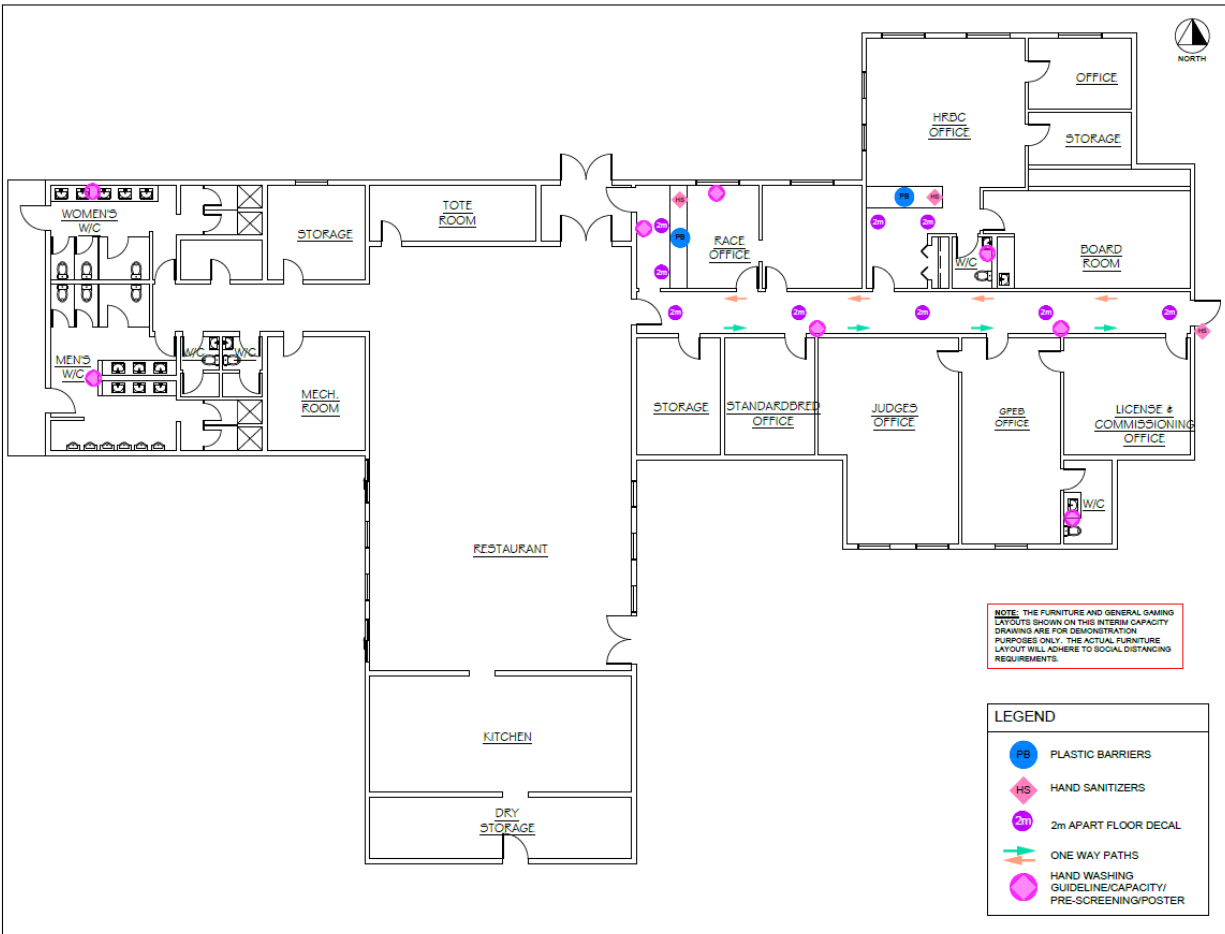
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Fraser Downs at Elements Casino Surrey Layouts and Hierarchy of Health and Safety Control Plans

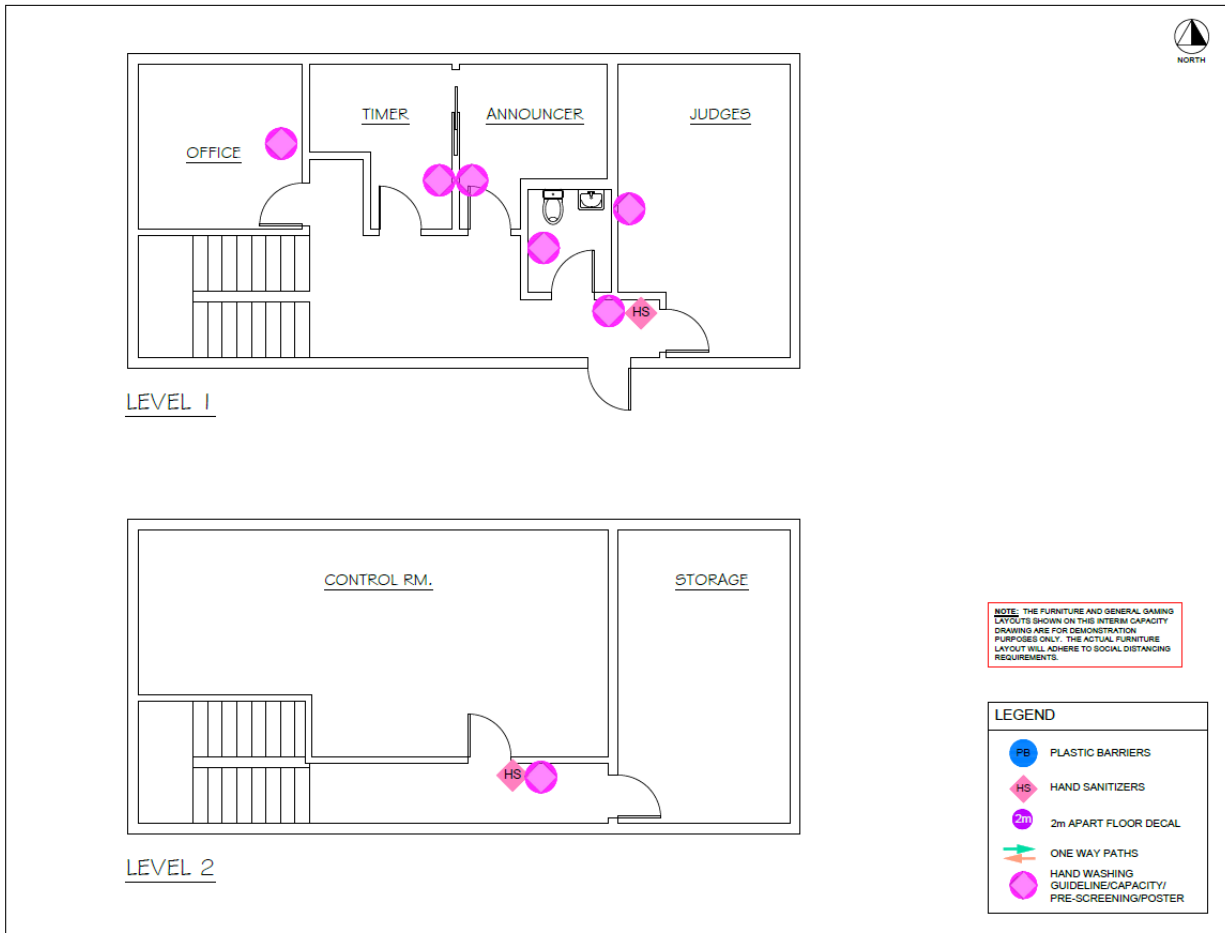
Fraser Downs at Elements Casino Surrey Existing Site Layout



Administration Building and Restaurant



Rooftop Operations



Race Day COVID-19 Health and Safety Plan

