



26 May 2021

By email: [REDACTED]

Ms Catherine Myers
 Chief Executive Officer
 Victorian Commission for Gambling and Liquor Regulation
 Level 3, 12 Shelley Street
 RICHMOND VIC 3121

Dear Ms Myers,

Re: Crown Resorts Limited - Responsible Gaming Enhancements

Crown Resorts Limited and its domestic subsidiaries (collectively, "Crown") recognise that responsible gaming ("RG") is a critical cornerstone of its social license to operate a gaming business in Australia. Accordingly, Crown is committed to providing services, programs and initiatives to minimise harm and problem gaming behaviours through the provision of timely and effective assistance for customers.

To enhance Crown's RG services, on 24 May 2021 the Board of Directors of Crown Resorts Limited endorsed a plan proposed by Steven Blackburn, Crown's new Chief Financial Crime and Compliance Officer, to increase operational, clinical, management and support staff for the RG function across Crown. 14.25 additional Full Time Equivalent ("FTE") roles will be added to Crown's existing complement of 38.55 FTE roles, bringing Crown's total FTE roles in the RG function to 52.8.

This 37% increase in FTE roles will provide the direct outcome of greater visibility of, and engagement by, operational staff on the casino gaming floor. In addition to providing greater visibility, these resources will assist with the collection and evaluation of critical data, leading to a material uplift in Crown's contribution to Australia's broader approach to responsible gaming. Supported by a new Data Analytics team, the RG function will be empowered to improve the identification of patterns and typologies, which will then be used to further hone Crown's approach to addressing problem gaming.

In addition to increasing FTE in the RG function, the Board has endorsed a number of proposed enhancements to support Crown's approach to responsible gaming. We recognise that some of the proposed enhancements will require discussion with, and approval from, the Victorian Government. These enhancements are attached at **Appendix A** to this letter. We would be happy to meet with you at your convenience to discuss these enhancements to Crown's responsible gaming program.

Kind regards,

[REDACTED]

Xavier Walsh
 Chief Executive Officer
 Crown Melbourne Limited

Copy: Ross Kennedy, Chairperson, VCGLR
 Helen Coonan, Executive Chair, Crown Resorts Limited
 Steven Blackburn, Chief Compliance & Financial Crime Officer, Crown Resorts Limited



Appendix A
Responsible Gaming Enhancements

RESPONSIBLE GAMING ELEMENT	ENHANCEMENTS
Time limits on play	<ul style="list-style-type: none"> • Crown will introduce the following time limits on playing at Gaming Machines, Table Games and Electronic Table Games: <ul style="list-style-type: none"> ○ Domestic Players – 12 hours in a 24 hour period with observation/intervention at eight and 10 hours. Customers will not be able to play for more than 48 hours in a week. ○ International Premium Program Players – staying less than seven days - 18 hours in a 24 hour period with interventions at hours 12, 14 and 16. Players staying for longer than 7 days would align with Domestic Player limits (not applicable to Crown Perth).
State-wide Exclusion Register	<ul style="list-style-type: none"> • Crown will support a state-wide exclusion register in the states in which it operates, as applicable. This would include: <ul style="list-style-type: none"> ○ Self Exclusion ○ Third Party Exclusion • This will be dependent on agreement with other industry participants and privacy considerations, among other complexities. • A staged approach starting with an Australasian Casino Self Exclusion Program to be proposed.
Bingo	<ul style="list-style-type: none"> • Prior to lockdown, Crown Melbourne has previously offered Bingo for Crown Rewards members. This program will cease.
BUS/Red Carpet Program	<ul style="list-style-type: none"> • Prior to lockdown, Crown Melbourne offered the 'Red Carpet Program', where community groups organise a group of members and arrange transport (by Bus) to Crown Melbourne. Participants are offered food and beverage and potentially funds toward the bus hire. This program will cease. • Prior to lockdown, Crown Perth operated line runs and offered a program allowing community groups to arrange a group visit to Crown Perth (bus organised by Crown Perth). Participants would purchase a Bus Pack of offers. This program has not operated since the initial COVID-19 lockdown, ceasing on March 23, 2020. It will not operate going forward.
Diversity of RG staff	<ul style="list-style-type: none"> • Crown will recruit additional Responsible Gaming Advisors, with priority given to those from Culturally and Linguistically Diverse (CALD) backgrounds including language skills that are underrepresented in the staff profile but overrepresented in persons experiencing harm from gambling.



Cashless	<ul style="list-style-type: none"> • Subject to the direction of the respective State governments, it is Crown's intention to move to cashless gaming over time. The main way to fund gaming activity would be via the introduction of a digital wallet for all games which would include enhanced RG functionality. For casual gaming machine players this could be via a ticket that can be purchased at the cage or ticket machines. • ATMs will still be placed no closer than 50m from the gaming floor for Crown Melbourne and 40m for Crown Perth. • Note acceptors will not allow for more than \$500 cash to be inserted at any one time in respect of uncarded play. With the exception of one older game theme, note acceptors for gaming machines at Crown Perth are currently restricted to \$100. • An enterprise approach would be contemplated by the Crown Resorts Digital Payment Steering Committee in consultation with relevant parties.
Marketing Offers	<ul style="list-style-type: none"> • Controls have been put in place to ensure that direct to member offers do not require customers to exceed historical behaviours (spend or visit frequency) in order to get their first benefit. No offers outside of this control have been sent to customers since reopening.
Crown Rewards	<ul style="list-style-type: none"> • Operational: Crown will replace gaming vouchers on signing up to the Crown Rewards Program with a non-gaming/promotional voucher instead. • Review/Research of the Loyalty Program: The objective of this research will be to determine if there are any aspects of the Loyalty Program that may be causing harm and what measures can be put into place control those risks. Considerations are: <ul style="list-style-type: none"> ○ Engagement of an external independent researcher ○ Release of customer data – to be anonymised ○ A reliable read on the extent of the causal direction between the association of elements of the Loyalty Program and problem gambling. This is complex as been noted in academic research ○ Establish a way to ensure the research can provide direction on any causal relationship to problem gambling ○ A consultative process with the researcher in the design and methodology
Gaming Sales staff incentives	<ul style="list-style-type: none"> • Currently, no Gaming Sales staff participate in a Sales Incentive Plan which involves turnover-based incentives. This will not change. All future employee incentive plans will consider RG implications.