

**Royal Commission into the Casino Operator and Licence****STATEMENT OF STEVEN BLACKBURN**

**Name:** Steven Blackburn

**Address:** Crown Towers, Level 3, 8 Whiteman Street, SOUTHBANK VIC 3006

**Occupation:** Group Chief Compliance and Financial Crime Officer, Crown Resorts Limited

**Date:** 21 April 2021

1. I make this statement in response to the Royal Commission's Request for Statement - 007.
2. In this statement, I refer to Crown Melbourne Limited, a company wholly owned by Crown Resorts Limited (the ultimate holding company), as "**Crown**", unless expressly noted to the contrary.
3. In this statement, I refer to Crown Resorts Limited, the ultimate holding company, as "**CRL**", unless expressly noted to the contrary.
4. Unless indicated otherwise, I make this statement from my own knowledge or on the basis of documents of Crown and CRL that I have reviewed so as to understand matters relevant to the Royal Commission's Request for Statement - 007.

**Crown employment history**

5. I have been employed by CRL since 24 February 2021, exclusively in the role of Chief Compliance and Financial Crime Officer.
6. Reporting directly to the Chief Executive Officer of CRL (the "**CEO**") and the Board of Directors of CRL (the "**Board**"), I am responsible for, among other things,
  - (a) providing expert advice to the CEO and the Board on compliance and financial crime issues;
  - (b) developing and leading the strategic approach for managing and enhancing compliance and financial crime to ensure efficiency, consistency and quality across CRL;
  - (c) enhancing CRL's capacity to respond proactively to threats and vulnerabilities; and
  - (d) leading teams in the analysis and interrogation of incidents and allegations to ensure appropriate and timely responses.

7. Each of the Executive General Manager, Compliance, the General Manager, Anti-Money Laundering and Group Money Laundering Reporting Officer (“**MLRO**”) and Group General Manager, Responsible Gaming report directly to me. The Head of Compliance, Betfair Pty Ltd and the Head of Compliance, Aspinalls Club Ltd report indirectly to me.
8. I was approved by the Victorian Commission for Gambling and Liquor Regulation (“**VCGLR**”) as an Associated Individual of Crown on 26 February 2021 and hold a Casino Special Employee Licence issued by the VCGLR on 1 March 2021. I was appointed as a Close Associate of Crown Sydney Gaming Pty Ltd by the Independent Liquor and Gaming Authority of New South Wales (“**ILGA**”) on 12 March 2021. I hold a Casino Key Employee Licence issued by the Gaming and Wagering Commission of Western Australia (“**GWC**”) on 1 April 2021.

### **Professional background**

9. Prior to joining CRL, I was most recently employed by the National Australia Bank (“**NAB**”) in the position of Chief Financial Crime Risk Officer and Group MLRO, from 29 June 2018 to 12 February 2021. In that position, I was responsible for Anti-Money Laundering, Counter-Terrorist Financing (“**AML/CTF**”), Sanctions and Anti-Bribery and Corruption (“**ABC**”) (collectively, “**Financial Crime**”) Risk. I was responsible for NAB’s Financial Crime program content and design and oversight of enterprise-wide implementation, including oversight of Financial Crime control activity and compliance with economic sanctions across NAB’s global operations. I assisted NAB’s lines of business in their assessment and management of financial crime risk, the development, implementation and monitoring of policies and procedures required under the financial crime compliance regime and the regular testing of their effectiveness. While at NAB, I endeavoured to build strong and collaborative relationships with NAB’s key regulators and stakeholders, including, among others, AUSTRAC, the Australian Federal Police and the Five Eyes Law Enforcement Group. I was also a member of the Strategic Advisory Board of the FINTEL Alliance.
10. Prior to joining NAB, I was employed by the Canadian Imperial Bank of Commerce (“**CIBC**”) as the Chief Anti-Money Laundering Officer (“**CAMLO**”) from January 2011 to June 2018. As CIBC’s global CAMLO, I developed and was responsible for CIBC’s Financial Crime programs, both from a risk and operations perspective. Between 2011 and 2018, I built CIBC’s financial crime program from a small, reactive team positioned poorly to manage financial crime and meet regulatory requirements, to one of the largest, most respected teams and programs in Canada. During my time at CIBC, I spearheaded a number of financial crime initiatives for the Canadian banking industry, represented Canada’s banks on the Five Eyes Law Enforcement Group and before a number of government panels and commissions and chaired and spoke at numerous financial crime and compliance conferences in Canada and internationally.
11. Between February 2004 and December 2010, I was employed by CIBC as a senior lawyer, culminating in the role of Managing Counsel in 2010. Among many areas of expertise, I was responsible for several facets of regulatory law, including in respect of AML/CTF and

international economic sanctions. After articling between 1997 and 1999, I practiced corporate law at Torys LLP and Fasken Martineau LLP in Toronto until joining CIBC in February 2004.

12. I hold a Juris Doctorate/Bachelor of Laws from Queen's University (conferred 1997) and a Bachelor of Arts (Honours) from McGill University (conferred 1994). I was called to the bar in the Province of Ontario in June 1999 and remain a member of the Law Society of Ontario (formerly known as the Law Society of Upper Canada).

#### **A. Implementation of a new AML/CTF Policy**

##### **72. How will the new AML/CTF Policy be implemented?**

13. CRL's current Joint AML/CTF Program (the "**Program**") was approved by the Board on 2 November 2020 and applies to all reporting entities that form part of the designated business group ("**DBG**") (**CRW.514.002.0110**) (see Section D below for the list of current reporting entities). The primary purpose of Part A of the Program is to identify, mitigate and manage the risk the DBG may face relating to or involving money laundering and terrorism financing ("**ML/TF**"). Part B of the Program establishes the DBG's approach to the identification of customers and sets out the requirements that Crown will meet when providing designated services to its customers (**CRW.514.002.0145**).
14. Part A and Part B of the Program establish obligations for each reporting entity, and more specifically, for each line of defence ("**LoD**") within those reporting entities. Pursuant to the Program and in accordance with CRL's 3 LoD model, each reporting entity's business operational management form the first LoD and assume ownership of and accountability for the management of ML/TF risk for their business. Additionally, each business unit is responsible for ensuring all Know Your Customer ("**KYC**") information required under Part B is collected and verified and for deploying quality assurance to ensure the integrity of that KYC.
15. Previous versions of the Program were enhanced in the current version of the Program. With the assistance of and oversight by the Financial Crime team, which sits in the second LoD, the first LoD is currently in the process of implementing all elements of the current Program through developing and deploying controls, policies, procedures, work instructions and guidelines. The businesses have introduced and implemented procedures to address most of their obligations under the Program. Training, including induction, online and targeted face to face has been and will continue to be delivered in respect of all new requirements and quality assurance will be conducted on a sample basis to ensure the success of the deployment and effectiveness of the new controls.

#### **B. Financial Crime Resourcing and Team Structure**

##### **90. How will the Compliance and Financial Crime department be independent of business units in practice?**

16. While the Financial Crime, Compliance and Responsible Gaming teams work closely with the business units in identifying, mitigating and managing risk, they are all second LoD functions that report directly into me, not into the business units. As mentioned above, my role reports directly into both the CEO and the Board, not to the reporting entities senior management or boards, thus establishing a clear independence from the business units. As the obligations in respect of managing ML/TF risk largely rest with the business units (first LoD), the Financial Crime team is primarily focused on providing advice to the business units and applying oversight and assurance to their actions.
17. While some operational activity resides with the Financial Crime team, it is necessarily distinct from the responsibilities of the business units. Specifically, the Financial Crime team is responsible for conducting investigations into unusual activity and submitting Suspicious Matter Reports (“**SMRs**”). These investigations arise upon receipt of an automated alert through our automated transaction monitoring system and/or an Unusual Activity Report (“**UAR**”), which are primarily submitted by employees of the business units. The details and results of these investigations are not shared with the business units, except with senior management in the context of potential divestment of customers when escalated to the Person of Interest (“**POI**”) Committee. While the business units may inform the investigations through the provision of information, they do not influence the investigations or the determination of suspicion in any way.
18. Currently, a small assurance team sits within Compliance. They are responsible for conducting independent assessments of business units’ compliance with various regulatory and policy requirements. As with financial crime investigations, the assurance testing is not influenced by the business units. This team will grow considerably under my impending plans for enhancing the Financial Crime and Compliance functions (my “**Plan**”) and, subject to Board approval, will report directly into me as a stand-alone unit.
19. While the business units are expected to provide operational reporting with respect to both financial crime and compliance, all risk-related reporting for senior management and the Board remains the responsibility and accountability of the Financial Crime and Compliance teams. This ensures that reporting to senior management and the Board is objective and independent of the first LoD.

#### **C. Promontory ML/TF risk assessment**

##### **91. Describe Promontory’s preliminary findings.**

20. I have set out in Appendix A the vulnerabilities and recommendations provided in the draft *AML Vulnerability and Strategic Capability Assessment* report prepared by Promontory Australasia (Sydney) Pty Ltd (“**Promontory**”). A complete record of the report has been produced to the Commissioner (**CRW.512.017.0001**).

**92. Describe the proposed 'enterprise wide' ML/TF risk assessment.**

21. I am designing an enterprise wide ML/TF risk assessment ("EWRA") that is intended to identify and assess the key risks inherent in the business and the effectiveness of controls in mitigating these risks to ensure CRL operates within an acceptable risk appetite and meets all regulatory obligations. The purpose and intended outcome of the EWRA is a clear articulation of key financial crime risks across the DBG. I also intend to identify accountable owners for the residual risks, with the accountable owners responsible for developing action plans to mitigate and manage the risks.
22. The EWRA is an evaluation of the inherent financial crime risk across the DBG against the design and operating effectiveness of the financial crime control environment in order to determine CRL's residual risk of facilitating financial crime and residual regulatory risk.
23. The EWRA will be based on a documented methodology with appropriate weightings applied to the risk and control factors. These factors include customer relationships, products and services in use, transactions taking place, the primary jurisdiction of customers and the channels through which customers are onboarded. Where disparate systems and processes across the DBG impair the extraction of data, some ratings may default to higher risk.
24. Promontory's preliminary findings in respect of potential vulnerabilities will contribute to the EWRA's assessment of inherent ML/TF risks at CRL.

**D. AML/CTF Program**

**93. Identify each of Crown's reporting entities.**

25. The reporting entities within the Crown designated business group comprise the following:
  - (a) Crown Melbourne Limited (known as Crown Melbourne);
  - (b) Burswood Nominees Limited (known as Crown Perth); and
  - (c) Crown Sydney Gaming Pty Ltd (known as Crown Sydney).
26. I note that whilst Crown Sydney has been registered as a reporting entity within the meaning of the *Anti-Money Laundering Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**), it has not yet commenced providing designated services.

**94. What steps will each of the board and senior management take in order to exercise greater oversight of AML/CTF compliance?**

27. In accordance with Section 7.6 of Part A of the Program, CRL has formed an AML/CTF Committee to facilitate senior management oversight AML/CTF compliance. The AML/CTF Committee comprises senior representatives from each of the relevant business units of each reporting entity. Members of the committee include the Chief Executive Officers of each

reporting entity, as well as senior executives from each of the key business areas and second LoD functions including Cage and Count, Gaming Machines, Table Games, VIP International, Security and Surveillance, Risk, Audit and Compliance.

28. Chaired by the AML/CTF Compliance Officer ("**AMLCO**"), the AML/CTF Committee meets a minimum of quarterly and focuses on monitoring and reviewing compliance with all applicable AML/CTF obligations set out in the Program. Matters discussed at the AML/CTF Committee include, but are not limited to, recommendations from the AMLCO with respect to the implementation of the Program, material employee due diligence matters, compliance issues including potential breaches of the Program, material changes to transaction monitoring rules and patterns, legislative change, the annual AMLCO report, the outcome of the EWRA, emerging risks, testing results from second and third LoD assurance exercises and key metrics relating to the risk profile of the reporting entities.
29. The AML/CTF Committee provides reports of material AML/CTF compliance matters to each reporting entity's Executive Risk and Compliance Committee ("**ERCC**"), the Board and the board of directors of each reporting entity and the CEO, thus contributing to Board oversight of material issues.
30. The ERCC for Crown, Crown Perth and Crown Sydney sit on a quarterly basis, and AML/CTF is a standing item on each agenda. The AMLCO presents, among other things, information in respect of existing and anticipated regulatory matters and engagements, applicable legislative changes, Program and financial crime framework changes, UAR statistics, AUSTRAC reporting ((including SMRs, Threshold Transaction Reports ("**TTRs**"), International Fund Transfer Instructions ("**IFTIs**")), financial crime training completion rates, customer and employee due diligence, potential compliance breaches, material financial crime projects and external reviews CRL.
31. Additionally, each business unit has appointed a Business Unit Compliance Officer ("**BUCO**") who is responsible for identifying, managing and mitigating ML/TF risks within their respective business units. BUCOs must complete a monthly compliance certificate, certifying compliance on behalf of their business unit, identifying emerging issues, proposing remedial strategies and implementing Program changes. Any certificates identifying ML/TF issues are reviewed and assessed by Financial Crime and the AML/CTF Committee.
32. To assist the Board in fulfilling its regulatory and prudential responsibility to oversee the implementation of the Program and management of financial crime risk, an AML/CTF report is submitted to the Risk Management Committee ("**RMC**") of the Board, the Board and the board of directors for each reporting entity at every sitting of each body. The report includes, among other things, information in respect of existing and anticipated regulatory matters and engagements, applicable legislative changes, Program and financial crime framework changes, UAR statistics, AUSTRAC reporting including SMRs, TTRs, IFTIs, financial crime training

completion rates, customer and employee due diligence, potential compliance breaches, material financial crime projects and external reviews.

33. In accordance with Section 8 of Part A of the Program, an Independent Review of Part A (and potentially Part B) of the Program must be conducted periodically (for further information, see Section F below). The Independent Review provides an independent assessment of the effectiveness of the Program and its implementation. The results of the Independent Review are reported to the ERCC, the boards of directors and senior management of each reporting entity, the RMC, the Board and senior management of CRL, assisting each in fulfilling their regulatory and Program-related responsibilities.
34. Since joining CRL, I have attended and participated in all scheduled meetings of the Board, the RMC, the boards of directors for the reporting entities, the Group Executive and the POI Committee. This affords me the opportunity to share my views from a financial crime and compliance perspective with all members of the Board, boards and senior management and inform and enable them to perform effective oversight. I also have frequent informal dialogue with members of the Board.
35. Subject to Board approval of my Plan, I will implement a number of enhancements to assist the Board and senior management in discharging their oversight responsibilities. These enhancements include, but are not limited to,
  - (a) implementing more robust Board and senior management reporting through the development of a monthly financial crime dashboard;
  - (b) greater second LoD assurance reporting on Program and control effectiveness;
  - (c) typology and intelligence reporting from a dedicated Financial Crime Intelligence Unit;
  - (d) maturity assessments on all elements of CRL's financial crime ecosystem;
  - (e) the results of a comprehensive EWRA;
  - (f) the development of a formal Responsibility/Accountability/Consult/Inform ("**RACI**") matrix as a means for defining and documenting financial crime roles and responsibilities across CRL, each reporting entity and each of the three LoDs;
  - (g) the introduction of a MLRO role in each reporting entity, reporting to an elevated Group MLRO who reports to me; and
  - (h) the reworking of the AML/CTF Committee into two new committees, as follows:
    - a Financial Crime Oversight Committee ("**FCOC**") that is accountable to the Board, is chaired by me, with all Group executives (chief-level) as members, that meets a minimum of six times each calendar year; and

- a Financial Crime Working Group (“**FCWG**”) that is accountable to the FCOC, is chaired by the AMLCO, with all Executive General Manager, Group General Manager and General Managers from all LoDs as members, that meets a minimum of 12 times each calendar year.

**95. What steps will each of the board and senior management take in order to drive a positive culture of AML/CTF compliance?**

36. In my view, driving accountability is critical to building a culture of compliance. Armed with more robust and more frequent financial crime reporting, the Board will be better positioned to allocate and drive accountability across the DBG, particularly amongst senior management. Further clarifying and enhancing risk appetite statements and settings relating to financial crime will also enable the Board to measure progress and hold senior management accountable.
37. Similarly, more robust and more frequent financial crime reporting will enable senior management to drive accountability across their business units. Ongoing targeted financial crime training will also reinforce the importance of compliance amongst senior management and across their teams.
38. Subject to Board approval, my Plan will see a shift in the focus of financial crime training from consequence-based training to benefit-based training. This means broadening the focus of training from what not to do so as to avoid regulatory issues, to what to do to help protect the vulnerable from criminal activity and to help ensure that those engaged in criminal activity are visible to law enforcement. To that end, we will launch a Board-sponsored half-yearly financial crime awareness sessions led by senior management which are aimed at improving employee understanding of how we, as a major gaming provider, can make a meaningful difference through the detection, deterrence and disruption of financial crime.
39. Subject to Board approval, my Plan also contemplates revisiting existing employee performance objectives to ensure that compliance is appropriately incentivized and rewarded. I will also revisit existing remuneration structures in order to attract top talent and ensure those in financial crime and compliance roles (profit-preserving roles) are rewarded in a manner consistent with those in profit-making roles.

**96. How frequently is it proposed that the AML/CTF Compliance officer report to the board?**

40. As indicated above, the Financial Crime team prepares reports for each scheduled meeting of the RMC, the Board and the reporting entity boards of directors.
41. The RMC and Board are each scheduled to sit a minimum of six (6) times per year, the Crown board is scheduled to sit a minimum of four (4) times per year, the Crown Perth Board is scheduled to sit a minimum of three (3) times per year and the Crown Sydney Board is scheduled to sit a minimum of four (4) times per year.



42. The AMLCO presents among other things, information in respect of existing and anticipated regulatory matters and engagements, applicable legislative changes, Program and financial crime framework changes, UAR statistics, AUSTRAC reporting including SMRs, TTRs, IFTIs, financial crime training completion rates, customer and employee due diligence, potential compliance breaches, material financial crime projects and external reviews.
43. As indicated above, the AMLCO currently chairs the AML/CTF Committee and reports to the Board and the reporting entity boards every time those bodies sit.
44. On an annual basis, the AMLCO and I will present to the RMC, the Board and the reporting entity boards of directors a comprehensive Financial Crime report. That report will include, among other things, an overall maturity assessment of the DBG's financial crime eco-system, the results of the EWRA, including an assessment of inherent ML/TF risk, control effectiveness and residual risk, thematic insights on potential breaches, second and third LoD review results, changes to the regulatory landscape, typologies and patterns relating to criminal exploitation and a progress report on any open regulatory matters and remedial activities.

#### **E. AML reporting structures and governance**

##### **98. What does it mean to say that the board and senior management are the “owners” of ML/TF risk?**

45. In recent years, AUSTRAC has increasingly focused on board and senior management oversight, as seen through AUSTRAC publications in December 2019 and March 2021. In the latter publication, AUSTRAC described effective oversight of AML/CTF compliance as involving “the board and senior management engaging, questioning, challenging and taking ownership of any ML/TF risk the business faces”, noting that to achieve this, “board and senior management need ongoing access to coordinated, structured, quality information on a consistent basis, and not only driven by specific events or incidents”.
46. As a foundation, the AML/CTF Rules require that Part A of the Program must be approved and subject to ongoing oversight by the boards and senior management of the reporting entities. As CRL has implemented a Joint AML/CTF Program (for the purposes of the AML/CTF Act and Rules), the Board and senior management of CRL can approve and provide ongoing oversight of the Program on behalf of the DBG. The Board most recently approved Part A of the Program on 2 November 2020 after it was approved by senior management in October 2020.
47. As mentioned above, Section 8 of Part A of the Program requires that Part A of the Program is subject to an Independent Review on a periodic basis. The results and any report associated with the Independent Review must be provided to the board and senior management of each reporting entity in the DBG. This empowers the Board, the boards of the reporting entities and senior management to exercise ownership of the Program and the associated ML/TF risk.

48. Senior management ownership of ML/TF risk is reinforced through the application of the three LoD model adopted by CRL and the reporting entities, as articulated in CRL's Risk Management Framework, Risk and Compliance Culture Framework, Risk Management Strategy ("**RMS**"), Risk Management Policy (**CRL.622.001.0011**).
49. CRL's RMS sets out the roles of the Board, the RMC and the first LoD with respect to the management of material risk. Under the RMS, the Board is responsible for the establishment and implementation of the risk management framework that enables CRL to appropriately develop and implement strategies, policies, procedures and controls to identify and manage its material risk exposures, including financial crime risk. The RMC has been delegated the responsibility for overseeing CRL's risk management framework and assists the Board by providing objective oversight of the implementation and operation of the framework.
50. Central to CRL's risk management framework is the concept that risk is best understood, identified, assessed, managed and integrated into decision making processes by assigning risk ownership and risk management responsibility to those responsible for making material business decisions. The chief executive officers and senior management of the reporting entities from the first LoD assume ownership of, and accountability for the management of, the material risks, including financial crime risk, faced by the businesses. They also own and are accountable for the implementation of the risk management strategy and controls designed and operating effectively to mitigate and manage material risks.
51. Section 7.7 of Part A of the Program clearly articulates that each reporting entity's business operational management (i.e. senior management) assume ownership of and accountability for the management of material risks, including ML/TF risk. The responsibilities and obligations of each business unit are further articulated in the AML/CTF Policy and Procedures. Each business unit is responsible for ensuring that all required KYC information is accurate and verified at the time of onboarding and on an ongoing basis. Additionally, each business unit is responsible for ensuring that they have appropriate quality assurance and testing processes in place to ensure compliance. These responsibilities ultimately reside with the senior management of each business unit and reporting entity.
52. Under the CRL Risk Management Policy, each Crown business is responsible for maintaining a risk register which catalogues material risks to each business, and the preparation and maintenance of the risk registers is the responsibility of each Crown business and is to be reviewed on a regular basis by senior executives and the RMC.

**99. How will that ownership manifest?**

53. With respect to the Board, ownership will manifest through the Board's engagement on financial crime matters. This will be evidenced through the Board's review and challenge of the content and breadth of financial crime matters reported to them.

54. With respect to senior management, ownership will manifest through actual accountability and deficiency management. Senior management currently reports to the AML/CTF Committee and will report to the FCWG and FCOC in respect of the management of financial crime risk within their business units. Senior management will also be accountable for financial crime risk management through risk registers as set out in CRL's Risk Management Policy and through compliance with all financial crime-related risk appetite statements and risk setting statements approved by the Board.
55. As mentioned earlier, senior management for each business unit has appointed a BUCO within their business unit. Each BUCO is responsible for identifying, managing and mitigating ML/TF risks within their respective business units. BUCOs must complete a month compliance certificate, certifying compliance on behalf of their business unit, identifying emerging issues, proposing remedial strategies and implementing Program changes.
56. Subject to Board approval of my Plan, I will revisit the employee performance objectives of each member of senior management to ensure that compliance with financial crime obligations are appropriately rewarded and failure to comply has an appropriate consequence.

**100. With AML/CTF being a standard agenda item, how will Crown ensure that AML/CTF reporting to the board does not become formulaic?**

57. Effective board reporting in the financial crime space cannot be formulaic. While specific operational metrics may be included to evidence trends and patterns, board reporting must provide the directors with an understanding of the ever-changing financial crime environment and potential exposures that businesses may face. While including AML/CTF reporting as a standard agenda item in board reporting is fundamental, the content of the reporting will drive engagement and, therefore, effective oversight.

**F. Independent review of the joint AML/CTF program**

**130. Which third party consultancy will be, or has been, engaged to conduct the independent review of the joint AML/CTF program?**

58. While I originally identified PwC as the likely reviewer, I saw greater value in retaining their services to assist with the uplift of CRL's approach to financial crime. As such, they are no longer eligible to conduct the independent review. I have yet to determine who will be engaged to conduct the Independent Review of the Program, which is scheduled to begin in the fourth calendar quarter of 2021 but have identified a few possible candidates.

**131. How is it proposed to ensure the independence of that review?**

59. In accordance with Section 8 of Part A of the Program, the reviewer selected to perform the Independent Review will either be CRL's Internal Audit function or an appropriately qualified external reviewer. To ensure independence, the reviewer mustn't have been engaged or

involved in the design, implementation or maintenance of the Program or the development of risk assessments or related internal controls. The results and any report prepared by the reviewer will be submitted directly to senior management and the Board. While the business will inform the review through the provision of information, the reviewer will need to attest to the Board that their conclusions were in no way influenced by the business.

#### **G. Deloitte Forensic Review**

##### **132. What were the conclusions, results or recommendations of Phase 1 of the Deloitte Forensic Review?**

60. I have set out in Appendix B the observations provided in the *Deloitte Assessment of Patron Account Controls (Phase 1)* to address specific money laundering risks. As at the time of making this statement, I understand a complete record of the report will be produced to the Commissioner at (CRW.512.023.0100).

#### **H. Significant Player review**

##### **133. Who is responsible for the Significant Player Review Policy?**

61. I am informed by Mr Xavier Walsh, Chief Executive Officer (Crown Melbourne), that:
- (a) Mr Tim Barnett, Executive General Manager - Table Games (Crown Melbourne);
  - (b) Mr Mark Mackay, Executive General Manager - Gaming Machines (Crown Melbourne);
  - (c) Mr Sean Knights, Executive General Manager - Gaming (Crown Sydney); and
  - (d) Ms Cori Cairns, General Manager - Table Games (Crown Perth)

are responsible for ensuring customer reviews are conducted in accordance with the Significant Player Review Policy on behalf of their respective business unit and on behalf of their respective property.

##### **134. Which staff will be conducting significant players reviews?**

62. I am informed by Mr Walsh that for Crown Melbourne, the Executive General Manager Table Games and Executive General Manager Gaming Machines have each appointed a suitable manager with gaming integrity and compliance responsibilities from within their departments to facilitate the reviews.

##### **135. Please provide an update of the results of the implementation of the Significant Player Review Policy.**

63. I am informed by Mr Tim Barnett, Executive General Manager - Table Games, that as at April 2021, approximately 2,600 current and former Crown Melbourne customers have been identified

for review. To date, approximately 1,850 customers have been reviewed, approximately 770 have yet to be reviewed and 107 have had their licence to enter the property withdrawn.

64. These customers are from several segments including local (i.e. Victorian based) and domestic (i.e. interstate based) Table Games and Gaming Machines customers, as well as former international program or premium customers now residing in Australia. The above number includes a group of approximately 500 international Premium Players who have been identified as most likely to visit when international travel to Australia resumes.
65. The review of this customer segment has now commenced and it is intended that this group will not be permitted to play at Crown until their individual review is completed and the business is satisfied that the customers do not pose an unacceptable risk from an:
- (a) ML/ TF perspective;
  - (b) regulatory compliance perspective; or
  - (c) reputational risk perspective.

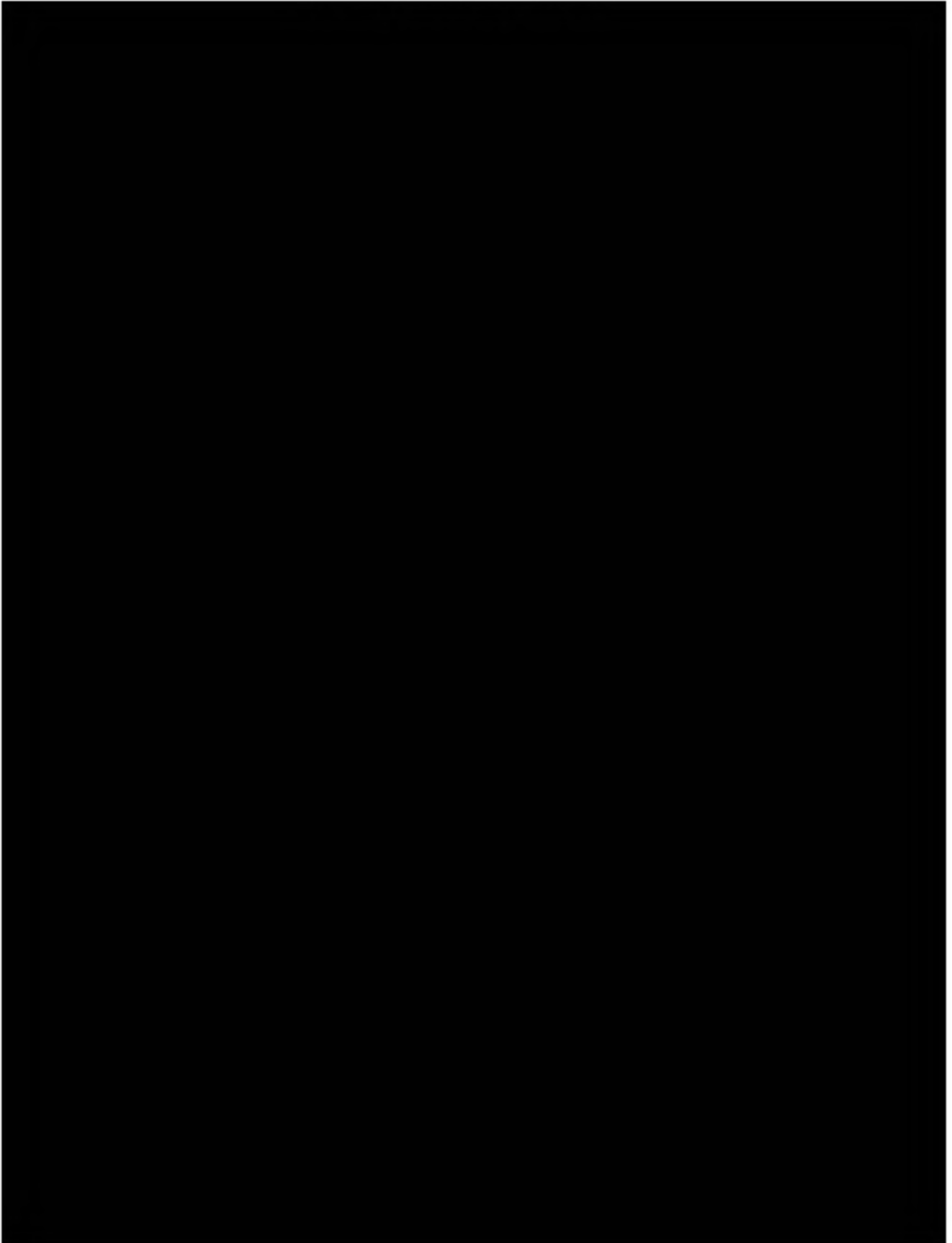
Signed:

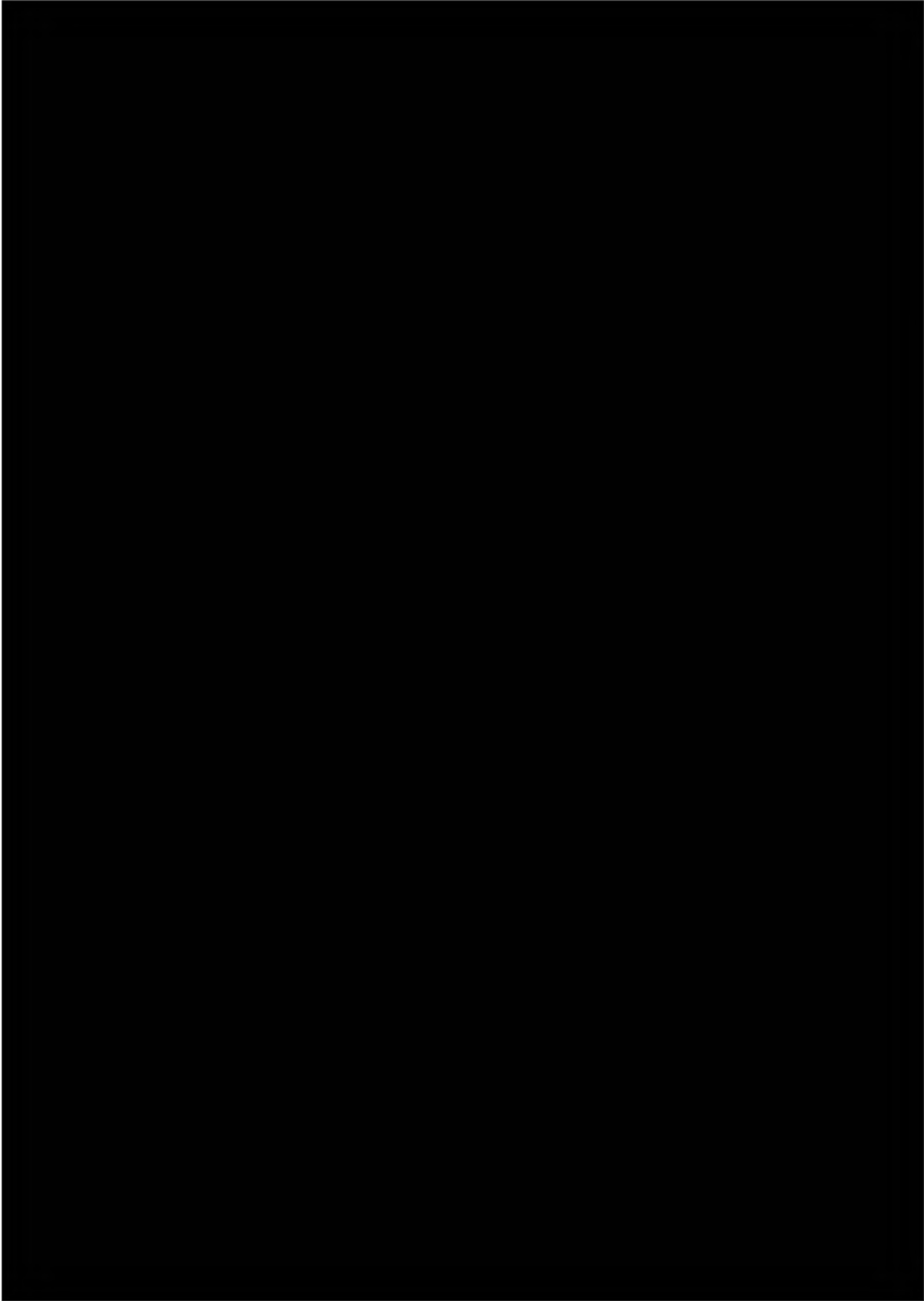
A large black rectangular redaction box covering the signature area.

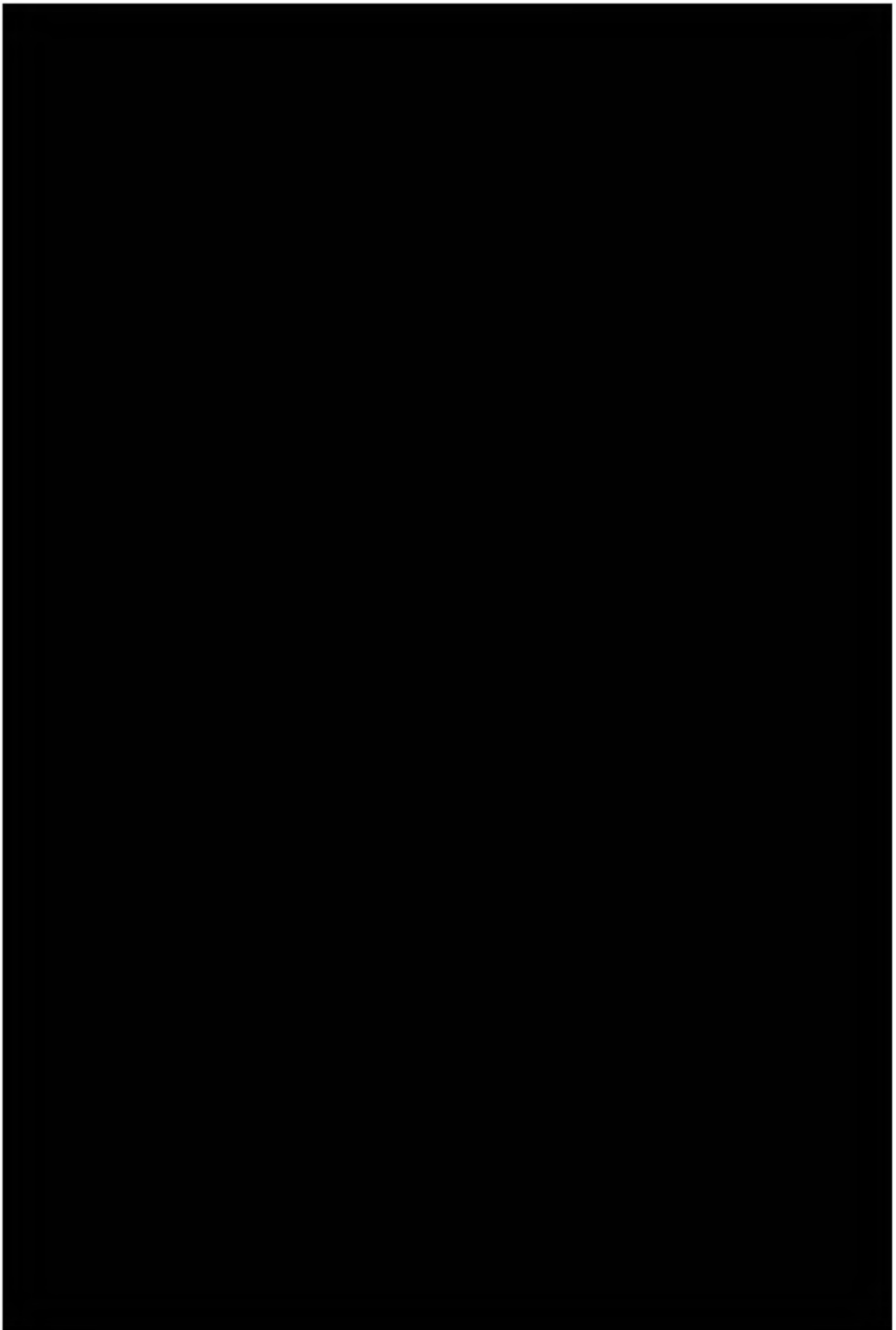
Date: 21 April 2021

Appendix A

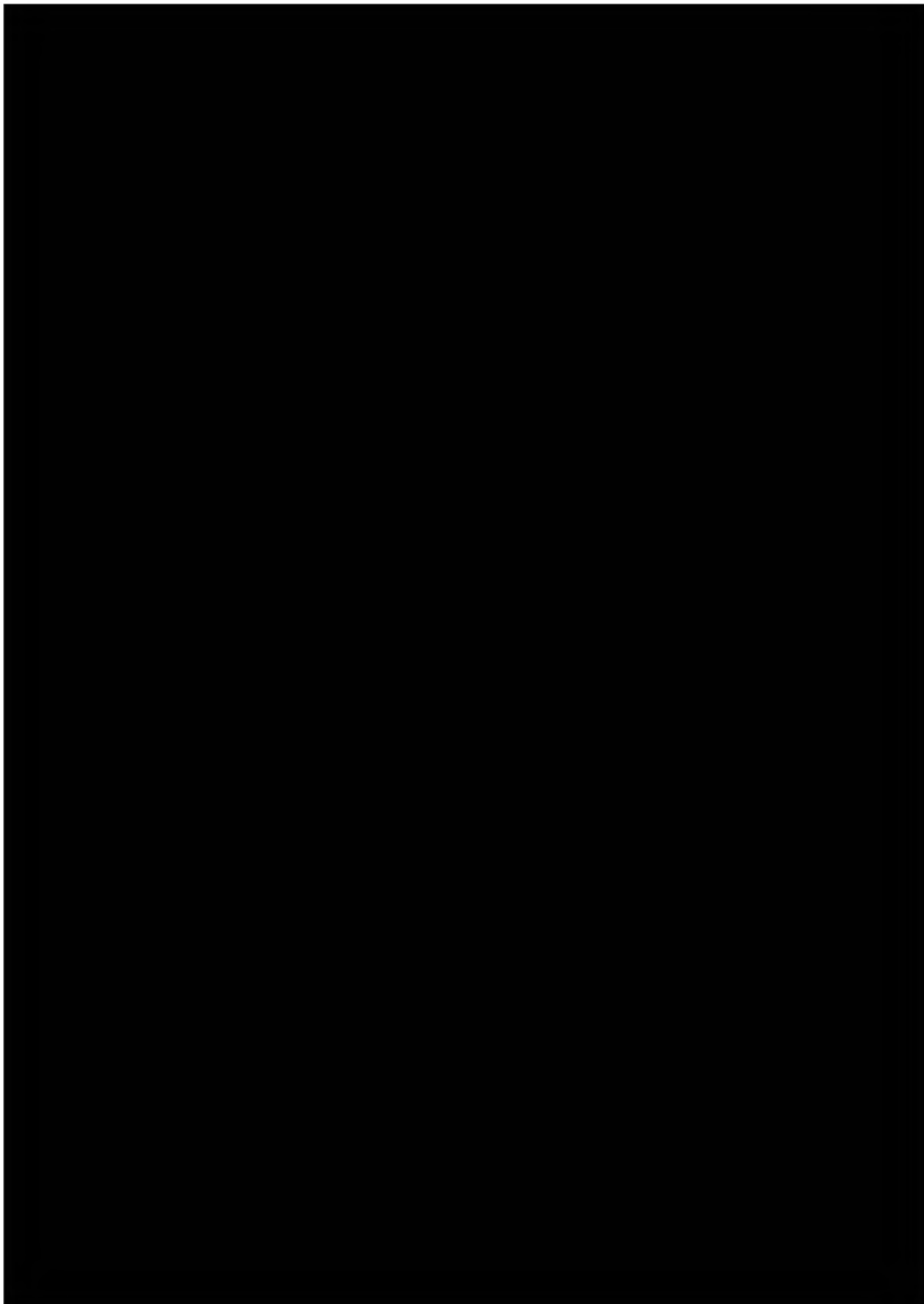
Summary of Promontory Report 2021

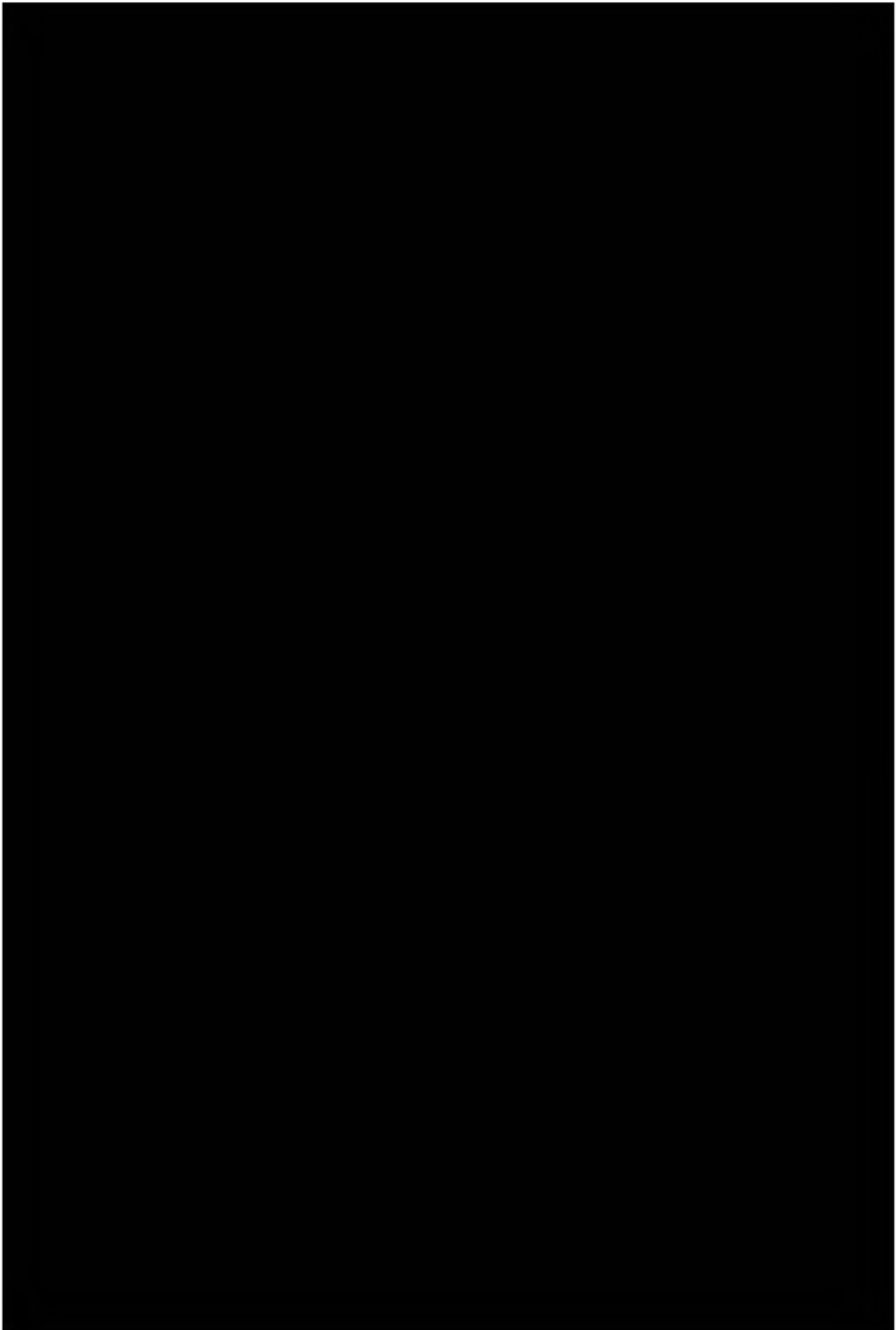














**Appendix B**

**Summary of Deloitte Phase 1 Report**

