

## 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:** 28 April 2021

1. I make this statement in response to the Royal Commission's Request for Statement - 009.
2. In this statement I refer to:
  - (a) Crown Resorts Limited, the ultimate holding company, as "**CRL**".
  - (b) Crown Melbourne Limited, a company wholly owned by CRL, as "**Crown**".
  - (c) CRL, Crown, Crown Sydney Gaming Pty Ltd and Burswood Nominees Limited collectively as the "**Crown Group**".
3. Unless indicated otherwise, I make this statement from my own knowledge or on the basis of documents of the Crown Group that I have reviewed so as to understand matters relevant to the Royal Commission's Request for Statement - 009.

#### **A. Background**

##### **1. Mr Blackburn's background and experience in the area of:**

- (a) AML/CTF, specifically; and**
- (b) Financial Crime, more generally.**

4. 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.

5. 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.
6. 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.
7. I hold a Bachelor of Arts (Honours) from McGill University (conferred 1994) and Juris Doctorate/Bachelor of Laws from Queen's University (conferred 1997). 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).

**2. Mr Blackburn's duties and responsibilities at Crown, including the range of his powers and authorities.**

8. I have been employed by CRL since 24 February 2021, exclusively in the role of Group Chief Compliance and Financial Crime Officer.
9. Reporting directly to the Board of Directors of CRL (the "**Board**") and the Chief Executive Officer of CRL (the "**CEO**"), I am responsible for, among other things,
  - (a) providing expert advice to the Board and the CEO 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 the Crown Group;
  - (c) enhancing the Crown Group'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.
10. Further duties and responsibilities of my role are listed in Schedule 2 of the Executive Contract with CRL that I executed on 25 November 2020 (the "**Executive Contract**") (CRW.510.005.0518).
11. A Crown Position Description for my role, appended hereto at **Appendix A**, was developed and settled following my commencement at CRL (the "**PD**"). The PD includes a list of what are described as Key Activities and Tasks, as well as expected Outputs and Measures. This content further delineates the duties and responsibilities of my role as well as expectations regarding my performance.
12. The PD includes the following content in respect of decision making and advice:

Decision Making and Advice	
Decisions this role makes alone	<ul style="list-style-type: none"> <li>• Independent reporting and resolution of all challenging and complex issues regarding matters of Financial Crime, Compliance and Responsible Gaming</li> <li>• Financial Crime, Responsible Gaming and Compliance instruction and advice</li> <li>• How to execute the operational plan</li> <li>• Operational decisions</li> <li>• Coaching and assessment of progress and performance</li> </ul>
Decisions this role makes under guidance	<ul style="list-style-type: none"> <li>• Resolution of challenging and complex issues that have PR risk</li> <li>• Involvement in projects unrelated to Financial Crime, Compliance or Responsible Gaming</li> </ul>
Advice/Recommendations this role provides	<ul style="list-style-type: none"> <li>• Advice to the CEO Crown Resorts and Executive Management team on Financial Crime, Compliance and Responsible Gaming policy, strategy and controls across the organisation</li> <li>• Advice to the CEO Crown Resorts and Executive Management team on compliance, responsible gaming and Financial Crime risks and providing guidance on such operations</li> </ul>

Decisions this role  
escalates

- Decisions that have broad reaching impacts, decisions may be escalated to ensure consistency across organisation, and on decisions requiring CEO or Crown Resorts approval

### 3. The principal terms of Mr Blackburn's employment contract with Crown.

13. Please refer to my responses above and the Executive Contract (CRW.510.005.0518).

### 4. Are there any, and if so what, KPIs in the employment contract?

14. Neither the Executive Contract nor the PD include key performance indicators. However, the Key Activities, Tasks, Outputs and Measures (as those terms are defined in the PD) provide some clarity regarding the expectations of CRL in respect of my performance and role.
15. Additionally, Schedule 2 of the Executive Contract includes the following provision:

#### ***Key Performance Indicators:***

Key performance indicators will be set by the Company for the Employee from time to time for the purposes of assisting in the review of the Remuneration Package which will also incorporate other non-financial indicators or performance such as diversity and health and safety elements. The Company and the Employee will agree the key performance indicators for 2021 following the execution of the employment contract.

16. In December 2020, Mr. Ken Barton, then CEO of CRL, and I agreed that we would meet shortly after my commencement date to establish key performance indicators for my role. Mr. Barton was no longer CEO of CRL when I commenced. Given the many regulatory matters that the Crown Group has been focused on since I joined, an opportunity to discuss key performance indicators for my role has not yet arisen. It is my expectation that the key performance indicators agreed upon for my role will not be linked to the profitability of the Crown Group but rather will focus on matters of compliance, responsible gaming and the management and mitigation of Financial Crime.

### 5. Does Mr Blackburn's remuneration include any, and if so what, short or long-term incentives?

17. Yes. Section 10 of the Executive Contract includes the following provisions (with terms defined in Section 1.1 of the Executive Contract):
- (a) In addition to annual TFR, an annual STIP may be paid to the Employee at the conclusion of the applicable financial year. Whether a STIP is granted will be in the sole and complete discretion of the Company and will depend on the performance of the Company over the applicable financial year and the performance of the Employee over

the applicable financial year as measured against Key Performance Indicators. The Company will notify the Employee in writing of any proposed payment under this clause.

- (b) Subject to clause 10(a), the Employee will be eligible for an annual STIP payment of up to [REDACTED] of the annual TFR.
- (c) In addition to annual TFR, the Employee may be invited to participate in the Company's LTIP.

18. Further information in respect of my remuneration can be found at Section 7, Section 10 and Schedule 3 of the Executive Contract.

**6. Prior to accepting employment, did Mr Blackburn enquire as to Crown's:**

**(a) present Financial Crime budget?**

19. Prior to accepting CRL's offer of employment, I enquired with Mr Barton as to the Crown Group's existing resources in the Financial Crime space. Specifically, I enquired as to the number of permanent, full time equivalent ("FTE") positions in the Financial Crime team and as to the systems supporting the implementation of the Crown Group's Financial Crime program. As I regard resources (both systems and people) as a better indicator of effectiveness than a set monetary amount, I did not enquire as to the specific amount the Crown Group had budgeted or planned to budget for Financial Crime.

**(b) proposed Financial Crime budget?**

20. Prior to accepting CRL's offer of employment, I enquired with Mr. Barton, some senior executives of CRL and members of the Board as to the Crown Group's willingness to invest in resources to uplift the Crown Group's Financial Crime program, including FTE and systems.

**7. If yes, what was the result of those enquiries?**

21. As a result of my enquiries, I received assurances from both Mr. Barton and members of the Board that I would have licence to enhance and improve the Crown Group's Financial Crime program, including through material investments in FTE and systems, should I accept the role.

**8. What is Crown's:**

**(a) present Financial Crime budget?**

22. I am informed by Mr. John Salomone, Chief Financial Officer – Australian Resorts, and Ms. Vasula Kessell, Financial Controller – Crown Perth, that the Crown Group's Financial Crime budget for fiscal year 2021 ("FY21"), which was set in May 2020, totals \$2,223,783, with \$1,274,992 attributable to payroll and \$948,791 attributable to other expenses. A further

\$1,550,000 has been budgeted for improvements to the systems upon which the Financial Crime program relies.

23. I am informed by Mr. Salomone, that CRL has spent in excess of \$1,800,000 to date in FY21 on external Financial Crime advice in support of uplifting its Financial Crime program.
24. Taken collectively, the year to date spend (as at 31 March 2021) for FY21 on Financial Crime for the Crown Group is 123% above the annual budget, reflecting a significant increase in investment beyond budget to uplift its Financial Crime program.

**(b) proposed Financial Crime budget?**

25. The Crown Group has not yet determined the amount it will budget for Financial Crime for the fiscal year 2022. My plan for uplifting the Crown Group's Financial Crime program, which will be presented to the Board on or before 31 May 2021, will include recommendations for significant investments in resources (people and systems). My expectation, given assurances from the Board, is that the proposals for further investment will be supported.

**9. Does Mr Blackburn consider that his department is properly resourced? If not, why not?**

26. An assessment of resourcing adequacy in the Financial Crime context is necessarily linked to the obligations set out in a reporting entity's AML/CTF program and how the reporting entity meets those obligations. The obligations establish the reporting entity's risk-based approach to the management and mitigation of Financial Crime risk. How a reporting entity meets the requirements set out in the risk-based approach will depend on the maturity of its program and program implementation. Reporting entities that are at an advanced maturity state will manage Financial Crime risk through large, sophisticated teams and systems, going well beyond minimum standards. Alternatively, reporting entities that are at an early stage of maturity will strive to meet obligations by deploying resources tactically in a manner that meets minimum standards. The Crown Group is at an early stage of maturity in respect of the management of Financial Crime risk.
27. Given its current maturity level, I consider the Crown Group's Financial Crime team and program to be appropriately resourced (from an FTE and systems perspective) to meet minimum standards. The Financial Crime team currently has 14 FTE in role and six FTE in recruitment. A further 6.5 FTE from the business are currently seconded to the Financial Crime team. Not including seconded FTE, there has been a 400% increase from increase in the FTE allocated to the Financial Crime team at the Crown Group since in 1 January 2020.
28. However, the Crown Group's Financial Crime program must evolve through considerable enhancements, thus requiring further material investment in both FTE and systems. Additional

capability and capacity must be introduced in order to build a sustainable, ever-evolving Financial Crime program at the Crown Group and to manage and mitigate Financial Crime risk.

**10. What is Mr Blackburn's opinion of Crown's compliance culture?**

29. I am impressed by CRL's and Crown's current compliance culture. Having met with most senior management and many employees since I joined CRL in late February 2021, my impression is that CRL's current Board and management is focused on ensuring that compliance is not only central to how the Crown Group operates, but also drives compliance-focused outcomes. I believe that CRL's management and Board are open to suggestions on tactics and strategies that will further embed compliance into the culture of the Crown Group.

**B. Future challenges**

**11. Describe the AML/CTF challenges facing casinos generally.**

30. The greatest AML/CTF challenge facing casinos is, at its core, the same challenge faced by other reporting entities, namely determining who is using your products and services and for what purpose. This challenge is amplified for casinos given the extensive use of cash by their customers. Unlike other payment methods, when cash is used by customers, the source of funds is unknown unless the customer is asked to attest to and evidence the source of funds. Thus, it is difficult to determine whether the cash used may be the proceeds of crime. Once placed, the cash can then be layered through subsequent transactions that further obscure the source and the nature of the funds.
31. Chapter 10 of Australia's *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007* (No. 1) ("**AML/CTF Rules**") exempts casinos from the application of Part 2, Division 4 of the *Anti-Money Laundering Counter-Terrorism Financing Act 2006* (Cth) ("**AML/CTF Act**") (applicable customer identification procedures) in a number of different circumstances, including where a customer's transaction involves an amount less than \$10,000. There is an exception to the exemption where the reporting entity determines that enhanced customer due diligence is required, which is often in instances where the reporting entity assesses the customer as presenting a high money-laundering and terrorism-financing ("**ML/TF**") risk. In practice, this exemption means casinos (and clubs and pubs with gaming machines) are not required to collect identification from the vast majority of customers.
32. Without obtaining identification from a customer, it is very difficult to determine what level of risk the customer may pose to the reporting entity. Further, it is very difficult to determine if the customer's transactional behaviour is unusual or indicative of money laundering or terrorist financing. When a customer uses cash for multiple gaming transactions, it is very difficult to build a profile and to identify potentially problematic patterns. This, in turn, makes it difficult for the reporting entity to determine what should be reported to AUSTRAC.

33. As set out in the *Financial Action Task Force Vulnerabilities of Casinos and Gaming Sector* (INQ.130.001.2034) report, criminals may target casinos through one or more of the following money laundering typologies:
- (a) structuring or smurfing, which involves the distribution of a large amount of cash into a number of smaller transactions in order to minimise suspicion and evade threshold reporting requirements;
  - (b) refining involving exchanging low denomination for high denomination currency, which may be attempted at a casino or through the use of electronic gaming machine note acceptors and then printing a TITO ticket to exchange for cash;
  - (c) use of illicit funds to gamble in the hopes of generating certifiable winnings. One way to do this is to play gaming machines or other games with low payout higher win/loss ratios. The money launderer will then seek to obtain casino cheque to layer the funds;
  - (d) betting against associates (intentional losses). This is also the case in games which provide money launderers the option to bet against an associate so that in most cases one party will win. Following the transfer of value the other party will seek a casino issued cheque or wire transfer of the “winnings”; and
  - (e) false identification documents are often used by criminals to conduct financial transactions at the casino, open casino accounts, undertake gambling transactions and redeem winnings anonymously.
34. Amongst most casino customers, including those that casinos have identified as presenting high ML/TF risk, there is a general absence of understanding about the legal and regulatory requirements casinos are subject to. This results in a culture of resistance to sharing information by customers who regard gaming solely as the purchase of entertainment.
35. As the vast majority of casino customers have never had to provide identification in order to gamble, and given their legitimate concerns about sharing personal information where they do not believe they are legally required to do so, it is challenging for casinos to obtain customer information beyond the minimum regulatory Know Your Customer (“**KYC**”) requirements, even where customers are transacting in amounts that are equal to or exceed \$10,000 cash. It is equally difficult to obtain information from customers regarding their source of funds and source of wealth.
36. De-risking by financial institutions due to changes in risk appetite with respect to facilitating casino related payments has increased the use of cash by customers to fund their gaming activity as customers are not permitted by their banks to use debit or credit cards to gamble.



37. In order to manage and mitigate Financial Crime risk, major reporting entities often employ subject matter experts who understand both the underlying business and how that business may be exposed to Financial Crime risk. Whilst such subject matter experts are prevalent in Australia in some industries, such as financial institutions, there are far fewer in the casino industry. As such, acquiring and applying expert Financial Crime talent in the casino industry can be challenging.
38. Similarly, major reporting entities in other industries, such as financial institutions, will often implement sophisticated automated systems that are specifically built for those industries to manage Financial Crime risk. There are no “off the shelf” technology systems specifically built for managing Financial Crime risk in the casino industry. Rather, casinos must significantly configure and customize systems developed for other industries or develop their own bespoke systems at great expense and effort.

## **12. How do those challenges differ from the AML/CTF challenges facing banks?**

39. As mentioned above, the vast majority of casino customers are not required to provide identification before the casino delivers the designated service (gaming) or at any time after. Almost all customers of financial institutions must provide identification prior to the financial institution delivering the designated service. This better positions financial institutions to understand who their customers are and what risk they pose.
40. Through their onboarding processes and systems, financial institutions are able to collect robust KYC information in respect of their customers, particularly where the banking relationship involves the provision of credit or private client management. Further, financial institutions have the ability to assess the ML/TF risk posed by their customers based on their account holdings, cumulative transactions across multiple products and services and their transactions with other customers and third parties. Casinos must ascertain the ML/TF risk posed by their customers based primarily on the individual gaming activity of their customers, much of which is transacted in cash and without KYC information.
41. Customers of financial institutions have come to expect that they must share personal information with the financial institution in order to obtain products or services. This is not the case for customers of casinos, as mentioned above.
42. As mentioned above, financial institutions have at their disposal multiple technology solutions for Financial Crime risk management (e.g. transaction monitoring, case management, KYC, enhanced customer due diligence) that are built specifically for the banking industry. No such tailor-made solutions exist for casinos.
43. Large casinos and financial institutions often share the challenge of disparate and inconsistent customer data, with the data often housed across legacy systems that do not communicate with

one another. This increases the challenge of building a customer profile for the purpose of scrutinizing customer activity.

44. Australia's four major banks and a number of other reporting entities are members of the Fintel Alliance, Australia's private-public partnership to collectively increase the resilience of the financial sector to prevent it being exploited by criminals and to support law enforcement investigations into serious crime and national security matters. The Fintel Alliance facilitates the sharing and analysing of financial intelligence to investigate and disrupt criminal and terrorist activity. The casino industry is not represented on the Fintel Alliance, thus limiting our ability to benefit from the excellent work of the Alliance or contribute to its output.

**13. What are the major AML/CTF and Financial Crime challenges facing Crown specifically?**

45. Many of the major Financial Crime challenges faced by the Crown Group are articulated in response to questions 11 and 12 above.
46. In particular, the Crown Group faces challenges in identifying unusual activity where we have no customer identification (based on the above-noted exemption) and where customers transact using cash.
47. Where the Crown Group is required to collect identification in respect of our customers, we are challenged by the common misperception amongst the public that information sharing is not required for gaming.

**14. How does Mr Blackburn propose to address those challenges?**

48. Whilst some of the challenges I have articulated above are shared across the gaming industry and beyond the control of the Crown Group, there are a number of measures I will propose at the Crown Group to uplift our approach to Financial Crime risk management. My proposals include, but are not limited to,
- (a) introducing further Financial Crime capability and capacity at the Crown Group to drive the evolution of our Financial Crime program;
  - (b) introducing an enterprise wide risk assessment based on enhanced customer risk assessment, product risk assessment and jurisdiction risk assessment methodologies, to hone our focus on where the residual risk is greatest;
  - (c) enhancing current Financial Crime training to help employees and relevant contractors better understand how to identify and escalate potential Financial Crime, with a focus on how they can make a difference for those most vulnerable in our society;

- (d) introducing greater rigour around the collection of information, particularly in respect of high risk customers;
- (e) enhancing existing Financial Crime-related systems and considering new technology solutions;
- (f) considering the reduction of cash thresholds relating to the collection of identification, notwithstanding that it is not required to meet our regulatory requirements;
- (g) introducing further alternatives to cash including e-wallets;
- (h) introducing data analytics to improve our ability to identify and apply criminal typologies; and
- (i) facilitating greater convergence between our Financial Crime and surveillance activities and intelligence, to improve our Financial Crime reporting.

**15. In Mr Blackburn's opinion, does Crown have a sufficient number of suitably qualified personnel working in the AML/CTF and Financial Crime areas? If so, why?**

49. As mentioned above, whilst I consider the Crown Group's Financial Crime team and program to be properly resourced based on its current maturity level, further resources will be required to improve and enhance the Crown Group's Financial Crime program. Equally important to increasing the number of FTE will be the introduction of further expertise and capability. In particular, I will focus on expanding our existing expertise in Financial Crime risk assessment, Financial Crime intelligence, assurance, Financial Crime operations, management reporting and regulatory affairs.

**C. Junkets**

**16. What is the risk of money laundering and terrorism financing by junket tour operators?**

50. As correctly identified in AUSTRAC's Money Laundering and Terrorism Financing Risk Assessment: *Junket Tour Operations in Australia* ("**AUSTRAC JTO Risk Assessment**") (CRW.512.041.0001), the risk of money laundering through junket tour operations ("**JTOs**") relates to:
- (a) the misuse of offsetting, often relating to the evasion of international funds transfer instruction reporting and laundering of domestically generated proceeds of crime;
  - (b) the onshore supply of large volumes of cash for unknown purposes; and

- (c) the use of banks and bank accounts to layer funds, and in particular cash, through remittance and gambling-related transactions, thus further obscuring the underlying nature of funds.

51. Ultimately, the key risk of money laundering by JTOs relates to the junket members' unknown source of funds and source of wealth, as well as the ability of junket tour operators to co-mingle proceeds of crime with legitimately sourced funds.
52. As with other forms of money laundering, the risk of terrorism financing relates to how proceeds of crime laundered using JTOs are ultimately applied. While I'm not aware of any specific examples of terrorism financing relating to JTOs, the risk remains.

#### **17. What is the risk of criminal activity from the use of junket operators?**

53. The AUSTRAC JTO Risk Assessment also correctly identified that JTOs are exposed to infiltration by transnational and serious organised crime groups ("**SOCGs**"), with partner agency intelligence indicating that:
  - (a) several international JTOs are or were linked to organised crime groups, including Asian crime groups;
  - (b) overseas-based transnational serious and organised crime ("**TSOC**") groups exploit junkets in order to move money to Australia and launder the proceeds of crime through Australian casinos; and
  - (c) given the use of offsetting practices to transfer value into Australia for use by a number of junkets, overseas TSOC groups are effectively creating an opportunity for domestic SOCGs to launder illicit cash by arranging for it to be deposited into junket accounts at casinos as a means to balance the domestic side of the offsetting ledger.

#### **18. How does Crown deal with these risks?**

54. On 11 November 2020, the Board resolved that Crown, Crown Sydney Gaming Pty Ltd ("**Crown Sydney**") and Burswood Nominees Limited ("**Crown Perth**") cease dealing with all junket operators. It was further resolved that "any future dealings with junket operators would only occur with a Junket Operator if that Junket Operator is licensed or otherwise approved or sanctioned by all gaming regulators in the States in which the Company operates."
55. In so resolving, the Board and the Crown Group determined to accept no risk with respect to JTOs until and unless such JTOs are licensed or otherwise approved or sanctioned by all gaming regulators in Victoria, New South Wales and Western Australia.

**19. If junkets are allowed in the Melbourne Casino is Crown able to comply with its reporting obligations?**

56. On 27 April 2021, the Victoria Commission for Gambling and Liquor Regulation (“**VCGLR**”) issued a letter of censure to Crown directing Crown to, among other things:
- “not recommence junket operations at the Melbourne casino until such time as Crown applies to and receives permission from the Commission to recommence junket operations. Any such application must demonstrate how Crown has addressed the Commission’s concerns as identified in the Commission’s reasons for decisions in this matter”.
57. In accordance with Board resolution, the Crown Group has no present intention of recommencing junket operations at any property in the Crown Group until and unless JTOs are licensed or otherwise approved or sanctioned by all gaming regulators in Victoria, New South Wales and Western Australia. Accordingly, Crown will not be seeking permission from the VCGLR to do so at this time.
58. If, contrary to my expectations, the VCGLR and the gaming regulators in New South Wales and Western Australia expressly licence or otherwise approve or sanction JTOs at Australian casinos, CRL could consider whether to amend its risk appetite with respect to JTOs. Should this happen, the Crown Group will comply with the terms of the aforementioned letter of censure and whatever regulatory framework and requirements are established by the respective States and/or the Commonwealth.

**D. Programs**

**20. What is the current status of Crown’s joint AML/CTF program?**

59. CRL’s current Joint AML/CTF Program (the “**Program**”) (**CRW.514.002.0110** and **CRW.514.002.0145**) was approved by the Board on 2 November 2020 and applies to the reporting entities that form the designated business group (“**DBG**”) comprising Crown, Crown Sydney and Crown Perth (each, a “**Reporting Entity**” and collectively, the “**Reporting Entities**”).
60. Whilst Crown Sydney has been registered as a reporting entity within the meaning of the AML/CTF Act, it has not yet commenced providing designated services.
61. 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 line of defence, the first line of defence is currently in the process of implementing all elements of the current Program through developing and deploying controls, policies, procedures, work instructions and guidelines.

62. 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.

**21. What is the current status of Sentinel?**

63. I am informed by Mr Nicholas Stokes, Group General Manager Financial Crime, that Sentinel was implemented on 2 February 2021.

**E. Previous reviews and recommendations**

**22. What is the current status of the Promontory review?**

64. On 29 March 2021, Crown received a draft of phase one of the report prepared by Promontory Australasia (Sydney) Pty Ltd ("**Promontory**") addressing potential AML vulnerabilities ("**Promontory Report**"). A complete record of the draft report has been produced to the Commissioner (**CRW.512.017.0001**).
65. I understand phase two of Promontory's review will comprise a forward-looking strategic assessment of capabilities to manage the risks associated with Financial Crime. This assessment will assist Crown in defining where its Program stands today and how it might evolve its Program going forward to optimise the use of its compliance resources and the latest developments in technology. I am yet to receive a draft of the phase two report.

**23. What steps, if any, have been taken to implement any recommendations from the Promontory assessment?**

66. A copy of the Promontory Report was provided to the Board and to executive management of the reporting entities on or around 1 April 2021. I am carefully considering each of the potential vulnerabilities and recommendations assessed by Promontory in its draft report.
67. Promontory's preliminary findings in respect of potential vulnerabilities will also contribute to the enterprise wide ML/TF risk assessment of inherent ML/TF risks at the Crown Group.

**F. Critical risk customers**

**24. How will the Person of Interest Committee work?**

68. The Person of Interest Committee ("**POI Committee**") was established to assist the Crown Group in preventing criminal influence or exploitation at its casinos. The POI Committee comprises several senior executives from the DBG, from both the first and second lines of defence, including the Chief Executive Officers of each Reporting Entity (the "**Reporting Entity**")

**CEOs**”). The POI Committee meets at least monthly and adjudicates through an out-of-meeting process on an ad hoc basis (CRW.510.004.0129).

69. The POI Committee fulfils its mandate by reviewing and adjudicating persons of interest (“**POIs**”) who have demonstrated a variety of unacceptable behaviors, including without limitation, potential activity relating to:
  - (a) dealing in proceeds of crime;
  - (b) money laundering and terrorism financing;
  - (c) threat to safety of patrons or staff;
  - (d) drug dealing, theft or fraud; and
  - (e) other illegal activity occurring on or off site.
70. Upon review, the POI Committee determines whether the POI should be permitted to continue to gamble at or gain access to the Crown Group properties.
71. Subject to Board approval of my plan, the adjudication of POIs who are escalated for reasons related to Financial Crime will be removed from the ambit of the POI Committee. Under my proposal, where a POI is escalated based on Financial Crime concerns, the Financial Crime team will prepare a briefing for the Reporting Entity CEOs. The briefing will include a recommendation that the customer be retained, be retained but with increased scrutiny or be divested. It will be incumbent on the Reporting Entity CEOs, as owners of the customer and the associated risk, to make the determination. In instances where the Reporting Entity CEOs do not accept the recommendation of the Financial Crime team, the POI will be further escalated to me. I will make the final decision, in my sole and absolute discretion.

#### **G. Staff training**

##### **25. Describe Crown’s program of staff training in the AML/CTF area.**

72. The Crown Group’s AML/CTF risk awareness training program has been designed and implemented having regard to the ML/TF risks reasonably faced by employees and relevant contractors of the DBG, and to enable employees and relevant contractors to understand:
  - (a) the obligations of the reporting entities under the Program, the AML/CTF Act and the AML/CTF Rules;
  - (b) the consequences of non-compliance with the AML/CTF Act and the AML/CTF Rules, as well as the consequences of non-compliance with the Part A of the Program;

- (c) the types of ML/TF risks that the reporting entities might face and the potential consequences of such risk;
- (d) the inherent ML/TF risks in the employee's role within the reporting entities;
- (e) the processes and procedures provided for by Part A of the Program that are relevant to the work carried out by a Reporting Entity employee; and
- (f) relevant casino red flags for ML/TF activity and criminal typologies.

73. Crown's AML/CTF risk awareness training program provides the following types of training:

- (a) induction training for all new employees and relevant contractors across all functions (including both gaming and non-gaming departments) on or shortly after commencement of employment;
- (b) a more detailed online risk awareness module which provides all employees and contractors with an overview of AML/CTF risks and typologies which is to be completed:
  - (i) where the employee or relevant contractor is involved in the provision of a Designated Service, as defined under the AML/CTF Act, before the employee commences in an operational environment; or
  - (ii) otherwise within eight (8) weeks of commencement of employment;
- (c) targeted business unit specific AML/CTF training aligned to the ML/TF risk faced by employees and relevant contractors in certain higher risk roles, including but not limited to:
  - (i) Cage;
  - (ii) Table Games;
  - (iii) Gaming Machines; and
  - (iv) Security & Surveillance;
- (d) refresher training annually for high and moderate risk roles, and every two years for low risk roles; and
- (e) remedial training where required.

74. I am informed by my colleague, Mr Shane Thomas, Group General Manager of Learning and Development, that the Crown Group's online AML/CTF training is delivered through Crown Learn, the Crown Group's online learning platform and is distributed to employees/contractors



based on a training needs analysis. This analysis ensures that all employees/contractors are allocated the AML/CTF training that is most relevant to them, based on their role, area of responsibility and level, in accordance with Part A of the Program.

**26. What changes, if any, do you recommend to that program?**

75. 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 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.
76. Subject to Board approval, my plan will see successful completion of AML/CTF training as a mandatory key performance indicator for relevant employees/contractors.

**27. What system of testing or assessment does Crown use to verify staff understanding of AML/CTF obligations?**

77. I am informed by Mr Thomas that all employees and contractors who are allocated online AML/CTF training must log in to Crown Learn to complete their training. They must complete their training within eight weeks of their commencement date or their refresher date. The employees and contractors are sent frequent automated reminders by email as their training deadline is approaching.
78. I am informed by Mr Thomas that at the end of each month, Crown Learn generates an automated dashboard report identifying completion rates and employees or contractors who have failed to complete their online AML/CTF training within the prescribed timeframe. The Crown Group's training team monitors the report and escalates any failure to complete by an employee/contractor to their manager. Should the dashboard report for the following month indicate that the employee/contractor has not yet completed the required training despite the escalation to their manager, the Crown Group's training team will then escalate the failure to complete to executive for the business unit in which the employee/contractor works.
79. I am informed by Mr Thomas that there is a series of assessment questions in the online AML/CTF training that employees/contractors must answer to demonstrate an understanding of the learning materials. If the employee/contractor answers a question incorrectly, they are given the opportunity to answer the question again and once the correct answer has been selected the employee is given more information about the scenario. This has been designed so the

employees/contractors completing the training have a more robust understanding of the ML/TF risks they may face in their roles.

80. The Financial Crime team will use data from the AML Portal, Crown's digitised unusual activity reporting tool, as an indicator of potential effectiveness following targeted face-to-face training.

#### **H. Bergin report and aftermath**

##### **28. Describe the work that is being done in the Financial Crime area as a result of the Bergin Report and the conclusions and recommendations set out therein.**

81. The way the Crown Group manages ML/TF risk, including the risk of criminal influence or exploitation, has improved considerably in the last year and a half, both before and after the tabling of the Bergin Report.

##### ***Bergin Report Response***

82. Notably, since the release of the Bergin Report, the Crown Group has:

- (a) engaged Deloitte to conduct forensic review which has three phases:
  - (i) Phase 1 of Deloitte's engagement has assessed the design and operating effectiveness of the current controls in place over Crown's patron bank accounts, including those that are designed to prevent and detect the activity identified during the NSW Casino Inquiry;
  - (ii) Phase 2 of the Deloitte review is ongoing and will confirm whether there are any transactional patterns or behaviours indicative of any money laundering typologies through historic or current patron accounts, including but not limited to the typologies identified in the Grant Thornton and Initialism reports. This phase will provide the Board with full visibility as to:
    - whether there were other transactional patterns or behaviours indicative of money laundering through the Riverbank or Southbank accounts not identified in the Grant Thornton and Initialism reports; and
    - the extent to which any other patron accounts (including the current patron accounts) may have been infiltrated by criminal elements.

The review period for this Phase is 22 February 2014 to 22 February 2021.

- (iii) Phase 3 of Deloitte's engagement will assess the design effectiveness and the operational effectiveness of a broader set of Crown's direct AML/CTF controls

(Relevant Controls) in so far as they relate to the patron accounts based on their findings from Phase 1 and 2.

Further information in respect of the Deloitte review is set out in the Deloitte engagement letter (CRW.512.023.0026);

- (b) provided AML/CTF risk awareness training session to the Board;
- (c) delivered the AML Portal, the Crown Group's digitised unusual activity reporting tool, which enables frontline employees to submit unusual activity reports to the Financial Crime team electronically. The Financial Crime team will also utilise the AML Portal to document investigations; and
- (d) released a risk-based alerting model into the live Sentinel environment which has been designed to:
  - (i) optimise and prioritise alerts generated from transaction monitoring rules for review taking a risk-based approach;
  - (ii) reduce false positives; and
  - (iii) allow Financial Crime Analysts to review a pattern of suspicious behaviour rather than individual suspicious transactions.

83. Further to the above, I am currently working on my plan for uplifting the Crown Group's Financial Crime framework, which will be presented to the Board on or before 31 May 2021.

#### ***AML/CTF Change Program***

84. Following the commencement of the Bergin inquiry, the Crown Group effected significant changes. Notably, this includes a significant body of work that led to the adoption of a new Program in November 2020 and the development of an automated transaction monitoring program, as well as the matters further explained below:
- (a) increased resourcing in the Financial Crime team;
  - (b) ceasing to deal with JTOs;
  - (c) sought and obtained third party reports on various elements of the Crown Group's Financial Crime program, including from Promontory, Initialism, Deloitte, Grant Thornton and others;
  - (d) implemented a new policy which sets limits on the amount of cash a customer can deposit at Crown and Crown Perth in any calendar day. Customers who seek to deposit

large amounts of cash are now required to complete a source of funds declaration (*Source of Funds (SOF) Form - Cash Transactions Policy* (CRW.512.023.0003));

- (e) restricted third party transfers and payments to and from money remitters (*Third Party Transfer and Money Remitters Policy* (CRW.512.023.0013));
- (f) formalised the process to return funds of Crown customers who do not comply with Crown's cash deposit prohibition (*Return of Funds Policy* (CRW.512.025.1110));
- (g) implemented a new escalation of critical risk customers policy which requires the divestment of critical risk customers unless the AML/CTF Compliance Officer approves an appropriate ML/TF risk mitigation plan proposed by the business (*Escalation of Critical Risk Customers Policy* (CRW.512.023.0024)); and
- (h) increased ML/TF reporting to the senior management, and the relevant committees and boards.

**29. Is it proposed that there be conducted a review or audit as to Crown's compliance with AML/CTF obligations?**

85. In accordance with Section 8 of Part A of the Program, CRL will engage an appropriately qualified external reviewer to conduct an independent review of the Program. 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 and have engaged them to assist. 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.
86. The independent review will assess:
- (a) the effectiveness of the Program, having regard to the ML/TF risk of each reporting entity in the DBG;
  - (b) whether the Program complies with the AML/CTF Rules;
  - (c) whether the Program has been effectively implemented; and
  - (d) whether each Reporting Entity in the designated business group has complied with the Program.

**30. Have you discovered any non-compliances by Crown with its AML/CTF obligations which were not examined in the Bergin Report?**

87. Yes. We have provided the Commissioner a schedule of identified actual or potential breaches of AML/CTF obligations in response to RFI-002. I understand that not all of these matters were addressed in the Bergin Report. We have also provided these schedules to AUSTRAC.

Signed:



Date: 28 April 2021

**APPENDIX A**

**Crown Position Description – Chief Compliance and Financial Crime Officer**



## Chief Compliance and Financial Crime Officer

### Crown Position Description

Position Number	00078119	Department	Executive Crown Casino
Position Title	Chief Compliance and Financial Crime Officer	Location	Crown Melbourne or Perth or Sydney or Aspinalls (London)
Reports To (role)	Chief Executive Officer – Crown Resorts Limited and the Crown Resorts Limited Board	Last Modified	26/04/2021
Number of Direct Reports	3	Number of Indirect Reports	All teams of: Financial Crime Compliance Responsible Gaming
Licences Required	All Australian licenses	Role Breadth	Crown Resorts

#### Position Summary

Reporting through to the Chief Executive Officer and the Crown Resorts Limited Board, this role will be supported by a team incorporating direct and indirect reports.

##### Direct reports

- Group Executive General Manager of Compliance
- Group General Manager of Financial Crime
- Group General Manager Responsible Gaming

##### Indirect reports

- Head of Compliance Betfair
- Head of Compliance Crown Aspinalls

This role will partner closely with the Group Executives for each of the Business Units on all matters related to Financial Crime, Compliance and Responsible Gaming. Further, this role will provide expert independent advice to the Chief Executive Officer (Crown Resorts Limited) and the Crown Resorts Limited Board on Compliance, Financial Crime and Responsible Gaming issues where required. The Chief Compliance and Financial Crime Officer will develop and lead the strategic approach for managing and enhancing compliance and managing financial crime and responsible gaming risk to ensure efficiency, consistency and quality across the Group (including in each of the Business Units). Key elements of the role will be enhancing Crown's capacity to respond proactively to threats and vulnerabilities, and the capacity to lead teams in the analysis and interrogation of incidents and allegations to ensure appropriate and timely response.

Key Position Accountabilities	% of Role	Key Activities and Tasks	Outputs & Measures (incl. but not limited to)
<b>Business outcomes:</b>	20%	<ul style="list-style-type: none"> <li>• Identifying and resolving potential vulnerabilities associated with ML, TF or other criminal influences related to financial services offered by Crown (i.e. inbound or outbound funds, Casino Value Instruments, cash and cheques).</li> <li>• Overseeing the Group AML and CTF obligations and Crown's engagement with AUSTRAC including with respect to those obligations.</li> </ul>	Management and mitigation of ML, TF related to financial services

		<ul style="list-style-type: none"> <li>• Oversight of the management and ongoing improvement of Crown's procedures around KYC, DD and ECDD for and other relevant counterparties.</li> <li>• Identifying opportunities to improve Crown's transaction monitoring systems including the further enhancement to, and future adoption of, leading edge technologies.</li> <li>• Developing tools to utilize information available to Crown to better identify relationships across Crown's patrons and counterparties to identify any potential criminal or other inappropriate customers.</li> <li>• Enhance culture across the group of awareness of and compliance with protections against financial crime vulnerabilities.</li> <li>• Developing and overseeing adherence to the Crown Resorts Group's Responsible Gaming and Compliance obligations and policies and overseeing the management of any potential breaches of the obligations and policies by the Business Units. This will include a particular focus on compliance with Crown's Casino legislative, regulatory and contractual obligations.</li> <li>• Reporting actual or potential compliance incidents to appropriate executive forums and the Board, providing advice on such incidents to those forums and the Board, and providing an assessment of Crown's compliance with its obligations to Line 1 employees including executive forums.</li> <li>• Reporting any compliance breaches to the CRO, CEO, Board and regulators, as appropriate and required.</li> <li>• Contributing to the Group CRO's accountabilities for risk assessment and management.</li> </ul>	
<b>Enforcement &amp; Regulatory requirements:</b>	20%	<ul style="list-style-type: none"> <li>• Oversee the review, investigation and reporting of suspicious matters including managing the engagement/regulatory reporting for those matters.</li> <li>• Maintain effective working relationships with law enforcement and industry regulators.</li> <li>• Ensure awareness and understanding of individuals' responsibilities to comply with relevant regulation standards and the Group's policies.</li> <li>• Senior oversight of regulatory examinations relating to financial crime and responsible gaming compliance, findings, and oversee the implementation of action plans needed to correct and embed necessary behaviours and processes.</li> </ul>	Timely review, investigation and reporting of any suspicious activity
<b>Financial Crime Risk Management &amp; Risk Mitigation:</b>	20%	<ul style="list-style-type: none"> <li>• Management of effective assurance over financial crime detection and management.</li> <li>• Providing functional control of investigative research/expert assessment on potential high risk accounts (ML/TF) and issues (ML/TF) which arise.</li> <li>• Oversight and execution of key financial crime, responsible gaming and compliance projects necessary to conform and, where</li> </ul>	Delivery of items aimed at instilling a culture of financial crime detection and management



		appropriate, exceed standards required by regulators.	
<b>Framework</b>	10%	<ul style="list-style-type: none"> <li>• Design and maintain a global FC framework (including policy and risk management processes) to manage regulatory obligations in all jurisdictions in which the group operates.</li> <li>• Lead the timely and accurate preparation of insightful financial crime and responsible gaming and compliance reporting to all relevant Executive and Board Committees.</li> <li>• Ensure suitability of Group Compliance, Financial Crime and Responsible Gaming related policies and procedures and oversee implementation including through appropriate training and communication.</li> <li>• Manage the role of MLROs in each Australian state where the Group operates its Casinos.</li> <li>• Drive the continued evolution of mature financial crime compliance models/settings, including customer, payment and trade screening and calibration, to support ongoing risk management and regulator expectations - including analytics, reporting and monitoring, incident investigation management and partnering across the Group (including Group Operations) to deliver financial crime detection and compliance and responsible gaming activities at all levels.</li> <li>• Develop, and/or enhance, the financial crime and responsible gaming compliance metrics and tolerances.</li> <li>• Lead thorough and careful reviews to provide deep analysis on targeted risk areas and incidents arising within business and jurisdictions. Provide insights on heightened ML/TF risk areas within a business/jurisdiction and ML/TF trends that can be pervasive across the enterprise.</li> <li>• Drive standardisation, alignment and integration of financial crime compliance risk and control management activities across the Group to support more informed business decisions.</li> </ul>	Company framework continues to be developed to demonstrate industry lead approach to alignment with all regulatory obligations
<b>Strategic Planning:</b>	5%	<ul style="list-style-type: none"> <li>• Lead the definition and delivery of a strategic, integrated and top quartile approach to financial crime, responsible gaming and compliance across the Group, overseeing and monitoring adherence to the financial crime, responsible gaming and compliance frameworks.</li> <li>• Identify opportunities for the enhancement of strategic and operational alignment of financial crime, responsible gaming and compliance activities and programs across the Group.</li> <li>• Provide the key stakeholders with direction to ensure business decisions are supported within a risk/reward framework and risk appetite.</li> </ul>	Delivery of items aimed at instilling a culture of internal control and risk management
<b>Customer Focus:</b>	5%	<ul style="list-style-type: none"> <li>• Reduce the potential impact of current and emerging financial crime and responsible gaming risks, protecting both our customers and the Group's reputation.</li> </ul>	Evidence of commitment to negating financial crime risk at all levels of the business

		<ul style="list-style-type: none"> <li>• Ensure that financial crime and responsible gaming risk management principles and requirements are well understood across the Group, and that the operational risk and assurance strategy supports these principles, including meeting our obligations to protect our customers.</li> <li>• Partner with the business to manage the reputational risk of the Group as it relates to financial crime and responsible gaming and compliance, evolving ML/TF high risk customer relationship management, ML/TF risk appetite policies and ML/TF training materials to assist in effective financial crime risk decision making.</li> </ul>	
<b>Leadership/ Management:</b>	10%	<ul style="list-style-type: none"> <li>• Personally role model the leadership behaviour required of our leaders and lead through our values.</li> <li>• Lead, manage, coach and develop the Compliance, Financial Crime and Responsible Gaming function incorporating direct and indirect reports and their teams.</li> <li>• Ensuring that direct reports identify requirements of regulatory expectation beyond the Group compliance framework and implement or oversee the implementation of appropriate policy, procedures, systems, controls and offer appropriate advice and assurance.</li> <li>• Role model constructive leadership to create and sustain a vision and culture of continuous improvement where people strive for high performance.</li> <li>• Drive and promote a high performance culture that embodies achievement, teamwork and collaboration.</li> <li>• Actively and effectively develop your direct and indirect reports.</li> <li>• Proactively seek opportunities to simplify financial crime, responsible gaming and compliance risk frameworks, policies and processes to optimise the effectiveness and efficiency of the Financial Crime, Responsible Gaming and Compliance function.</li> <li>• Build strong professional relationships with Group Executives and senior stakeholders of the business.</li> <li>• Apply Crown Resorts people management systems to effectively manage such issues as occupational health and safety, recruiting and on boarding new staff, setting KPIs, creating development plans, supervising work.</li> <li>• Providing feedback formally and informally, carrying out disciplinary procedures when necessary, recognising and rewarding staff, etc.</li> </ul>	Visible authentic leadership of team Strong communication channels with reports
<b>Diversity and Inclusion</b>	5%	Embrace and lead Crown's diversity and inclusion programs via direct involvement in Steering Committees and relevant groups where appropriate including Sustainability, Indigenous Employment, Gender Equity and Disability programs.	Champion and Lead diversity and inclusion programs and projects. Participation in selected committees and groups, including but not limited to those of Sustainability, Indigenous Employment, Gender Equity and Disability programs.

Health & Safety	5%	Per Crown Health and Safety Plan	Per goals and targets of Health and safety Plan
Qualifications and Experience			
Qualifications	<ul style="list-style-type: none"><li>Relevant tertiary qualification in Compliance and Financial Crime.</li></ul>		
Experience	<ul style="list-style-type: none"><li>Track record of leadership and the provision of expert advice in areas of Compliance and Financial Crime within a public company in a relevant market.</li><li>Well-rounded background in Compliance and Financial Crime.</li><li>Demonstrates the highest standard of integrity and professionalism.</li><li>Relevant tertiary qualification in Compliance and Financial Crime.</li><li>Demonstrated understanding of ASX compliance standards.</li><li>Experience of working in a fast paced, consumer facing, service / retail environment.</li></ul>		
Skills and Knowledge			
Skill or Knowledge Area	Proficiency Required	Why is this required	
Business Acumen	Advanced	Brings broad business orientation and the capacity to contribute at a commercial decision-making level, including understanding a complex array of performance drivers.	
Strategy and Judgement	Advanced	Strong strategic thinker with sound judgment. Able to provide input to the Executive Management Team in assessing business risk, performance, issues and optional strategies.	
Conceptual and Analytical Skills	Advanced	Intellectually strong, capable and agile – able to absorb and synthesise new information, understand complex situations and assess implications. Strong analytical skills with the ability to develop and present practical recommendations.	
Building and Managing Teams	Advanced	Track record of recruiting, developing and motivating high performers and building strong teams. Ability to delegate and hold team members accountable. Able to encourage independence in the team while maintaining a grasp on critical issues and progress on initiatives.	
Building Relationships and Influencing	Advanced	Able to work collaboratively with peers to achieve the company's goals. Develops and maintains productive relationships at all levels in the organisation and outside of the company. Able to produce results through influencing and persuasion, as opposed to direct line authority. Able to adjust communications and influencing style to suit different audiences. Effective and credible communicator across a wide cross section of audiences.	
Board preparation and report writing	Advanced	High level of report writing and communication skills. Ability to prepare and coordinate Board reports and business case justifications and to present to Boards and Board Committees.	
Supporting the Growth of the Company	Advanced	Developing and implementing plans to ensure the success of the company, including the establishment of appropriate systems of financial reporting, risk management and internal control.	
	Advanced	Recognising the 24/7/365 nature of the business, being able to respond real time to operational/financial issues that arise and communicating clearly to relevant interested parties with short	

Managing Real Time Information Flows and Multiple Stakeholders		lead times. Also recognising the potential for Board member/major shareholder requests for information/analysis with short lead times. Ability to work effectively and efficiently under pressure to meet deadlines.	
Key Relationships/Interactions			
Role	Internal/External	Frequency	Purpose/Nature of Contact
Crown Resorts CEO	Internal	Daily	To report, consult, and collaborate on strategic plans. To obtain guidance and advice and confirmation on decisions such as policies, procedures, and controls that effect broadly
Executive Teams	Internal	Daily	To collaborate and ensure focus is on delivery of business outcomes. Is a team player, leader, and advisor who is cooperative and shares information and offers guidance. Provide information to ensure business continuity, leadership and direction.
Other department stakeholders	Internal	Weekly	To communicate and collaborate, sharing of assistance and advice. Assisting with implementation and roll out of measure to increase compliance and prevent financial crime.
Business Unit staff	Internal	As appropriate	Provide information to ensure business continuity, leadership and direction.
Board and Board Committees	Internal/External	As appropriate	To inform and execute whilst remaining independent at all times.
External Audit and Services	External	As appropriate	To engage, instruct and advise relative to regular and ad hoc audit and reporting requirements
Decision Making and Advice			
Decisions this role makes alone	<ul style="list-style-type: none"><li>Independent reporting and resolution of all challenging and complex issues regarding matters of Financial Crime, Compliance and Responsible Gaming</li><li>Financial Crime, Responsible Gaming and Compliance instruction and advice</li><li>How to execute the operational plan</li><li>Operational decisions</li><li>Coaching and assessment of progress and performance</li></ul>		
Decisions this role makes under guidance	<ul style="list-style-type: none"><li>Resolution of challenging and complex issues that have PR risk</li><li>Involvement in projects unrelated to Financial Crime, Compliance or Responsible Gaming</li></ul>		
Advice/Recommendations this role provides	<ul style="list-style-type: none"><li>Advice to the CEO Crown Resorts and Executive Management team on Compliance, Responsible Gaming and Financial Crime policy, strategy and controls across the organisation.</li><li>Advice to the CEO Crown Resorts and Executive Management team on compliance, responsible gaming and financial crime risks and providing guidance on such operations.</li></ul>		
Decisions this role escalates	<ul style="list-style-type: none"><li>Decisions that have broad reaching impacts, decisions may be escalated to ensure consistency across organisation, and on decisions requiring CEO or Crown Resorts approval</li></ul>		
Financial Impact and Accountability			

Direct Financial Accountability	<ul style="list-style-type: none"><li>• Own BU / department budgeting</li></ul>
Indirect Financial Influence (optional)	<ul style="list-style-type: none"><li>• Assist the CEO Crown Resorts and in consultation with Executive Management to ensure other BUs / Departments are appropriately financially resources to ensure Compliance, Responsible Gaming and Financial Crime policies and procedures are supported.</li></ul>
<b>Other Information</b>	

Organisational Chart

