CRW.512.073.0106

Deloitte.

For discussion purposes only



Crown Resorts Limited Forensic Review – Updated estimated project timelines DRAFT as at 7 May 2021

Summary of updated estimated project timelines, as at 7 May 2021

For discussion purposes only

Workstream	Key milestone	Status	Estimated completion date	Critical dependencies and responsibilities
	Original Deloitte Report Crown Response to Deloitte Report Deloitte Assessment of Crown Response to Deloitte Report 	Complete	N/A	N/A
Phase 1: Controls Assessment	Addendum (Crown Perth) Operational Effectiveness testing (in progress) Deloitte Report Crown Response to Deloitte Report Deloitte Assessment of Crown Response to Deloitte Report 	Complete	N/A	N/A

This summary should be read in conjunction with the attached Notes and working assumptions as well as our Engagement Letter dated 22 February 2021 and any associated variations.

Summary of updated estimated project timelines, as at 7 May 2021 (cont'd...)

Workstream	Key milestone	Status	Estimated completion date	Critical dependencies and responsibilities
Phase 2: Forensic Review	 Preliminary Assessment of Crown legal entities and bank accounts Identification and verification of Crown legal entities (<i>complete</i>) Identification of patron and non patron bank accounts (<i>complete</i>) Non-Patron Account Review Sample based review of non-patron bank account transactions (<i>in progress</i>) 	In progress	21 May 2021	 Availability and accessibility of relevant bank statement detail (Crown). Provision of available bank statement detail (Crown); Identification of sample of transactions for review (Deloitte); Provision of responses to transactions identified (Crown).
	 Preliminary Patron Data Review Analysis of Patron Activity Develop and document ML typologies (complete) Develop analytics-based screening tools incorporating ML typologies (in progress) Identification, receipt and processing of key data inputs (patron bank account details and SYCO data inputs) (in progress) Conduct preliminary analysis using screening tools Review of Patron Activity Review and refine preliminary analysis Consider use of third party / public record searches to inform preliminary analysis Where required, validate output of preliminary analysis with representatives from Crown (factual only) Document outcome of preliminary analysis, including typology / activity summaries and visual aids (where needed) Identify selected activity to take forward for further review. 	In progress	25 June 2021	 Availability and accessibility of relevant bank statement detail for 7 years (Crown). Provision of available bank statement detail no later than 14 May, 2021 (Crown);

This summary should be read in conjunction with the attached Notes and working assumptions as well as our Engagement Letter dated 22 February 2021 and any associated variations.

Summary of updated estimated project timelines, as at 7 May 2021 (cont'd...)

Workstream	Key milestone	Status	Estimated completion date	Critical dependencies and responsibilities
Phase 2: Forensic Review (cont'd)	 Patron Data Review Further review of selected activity on Patron Accounts (#) Identify additional information sources (internal to Crown or external) to assist in conducting further review (Deloitte & Crown) Conduct further analysis of selected activity, including processing and review of additional information Consider use of additional third party / public record searches to inform further analysis Where required, validate output of further analysis with representatives from Crown (factual only) Document outcomes of further analysis Prepare draft report in connection with Forensic review. Crown Response to Deloitte Report (*) Deloitte Assessment of Crown Response to Deloitte Report (*) 	Not yet started	27 August 2021	 Material completion of Preliminary Data Analysis and prioritisation, including identification of transactions / activity / behaviours of interest (Deloitte) Identification of relevant additional information to support further review of areas of interest (Deloitte & Crown) Availability and accessibility of relevant additional information Provisional of additional available internal information to support further review (Crown) Access to relevant Crown staff to discuss any areas of interest (Crown)

Notes:

- The nature and volume of work required (and therefore the associated work effort and estimated timeline) for the Further Review of selected Patron activity will be directly informed by the outcome of the Preliminary Patron Data Analysis and Review noted on page 3 above. Whilst the exact nature and volume of work required is not known as at the date of this document, the work is expected to include 'deep dives' of specific activities, patron behaviour or other areas of specific ML/TF concern that may not be explained by the typologies developed to date. Based on our experience in conducted similar work of this nature; and assuming c. 3-5 'deep dive' areas, we have provided an indicative timeframe for this work. As the nature and volume of this work become clear, we will discuss this work with Crown stakeholders and provide work effort and (updated) timeline estimates for any further work.

* The estimated completion dates for Phase 2 outlined above specifically refer to the work to be undertaken by Deloitte. It is not yet clear the timeframe Crown may need to respond to Deloitte's report; and in turn, Deloitte to provide an assessment of Crown's response.

This summary should be read in conjunction with the attached Notes and working assumptions as well as our Engagement Letter dated 22 February 2021 and any associated variations.

Summary of updated estimated project timelines, as at 7 May 2021 (cont'd...)

Workstream	Key milestone	Status (as at 13 April 2021)	Estimated completion date	Critical dependencies and responsibilities
Phase 3: Further Controls Assessment	 Further Controls Assessment Design review Operational Effectiveness testing Prepare draft report in connection with Further Controls Review Crown Response to Deloitte Report (*) Deloitte Assessment of Crown Response to Deloitte Report(*) 	Not yet started	27 August 2021	 Sufficient completion of Forensic Review to inform work required Provision of relevant information (Crown) Access to relevant Crown staff to discuss transactions / areas of interest (Crown) Timely finalisation of reporting process in accordance with agreed timelines (Deloitte & Crown)
Project Management Office (including engagement leadership and expert advisory)	 Ongoing leadership and oversight of the engagement to ensure delivery against agreed objectives Ongoing project management support, delivery oversight; Discussions with Crown and Allens regarding project status, team onboarding and status of licensing requirements Expert advisory provided at appropriate junctures supporting expertise to delivery teams on specific matters 	Ongoing	27 August 2021	

This summary should be read in conjunction with the attached Notes and working assumptions as well as our Engagement Letter dated 22 February 2021 and any associated variations.

Updated estimated project timeline, as at 7 May 2021

For discussion purposes only

	Estimated timeframe of future work effort					
	MAY	JUNE	JULY	AUGUST		
hann de Comhuile Annanamh						
hase 1 - Controls Assessment 1 Addendum (Crown Perth)						
nase 2 - Forensic Review						
Non-Patron Account Review						
 Patron Activity Review Data management(Phase 2 and Phase 3) 						
- Analysis of Patron Activity	V					
Design data model and analytics-based screening tools (in progress)						
Build data model, design and run data transformation scripts (in progress)						
Rule analysis and dashboard creation for forensic review						
- Preliminary review of Patron activity						
4 Further review of selected activity on Patron Accounts						
hase 3 - Further Controls Assessment						
5 Further controls assessment						
Project Management (including engagement leadership and expert advisory)						
6 Ongoing project management office support						
· ····································						
7 Engagement leadership and expert advisory						
	KEY Expected timeline	fau tha manle				
		timeframe for the work				
		y stage work for this wo	rkstream expected to ta	ke place.		

This summary should be read in conjunction with the attached Notes and working assumptions as well as our Engagement Letter dated 22 February 2021 and any associated variations. Refer to pages 2-5 above for the breakdown of specific activities related to each workstream.

Summary of updated estimated project timelines, as at 7 May 2021

For discussion purposes only

Notes / Working Assumptions:

- a. This estimate is based upon our knowledge and understanding of the overall activities and effort required to undertake those activities as of 7 May, 2021. As the work progresses, information may come to light that may require us to change this estimate of work effort. An example of this is that the exact volume of information requiring analysis is not fully known as at the date of this document. The estimated work effort (including duration) and estimated completion dates are based on assumptions regarding volumes of information and degree of analysis required. Where these assumptions do not hold true, this may impact overall timing (and therefore estimated completion dates) and effort estimates.
- b. It should be noted that the estimated work effort (including duration) and estimated completion dates of key milestones will differ from each other based on other inputs, including assumed timelines for provision of information. Where the timelines for provision of information and other factors extend beyond expected timelines, this will impact overall timing (and therefore estimated completion dates).
- c. This updated summary does not include an updated estimate of work efforts and fees estimate. This will be provided separately.
- d. Specifically, in relation to Phase 2:

Non-Patron account review

- a. For a small percentage of transactions requiring further clarification, it may be necessary to hold a number of conversations before particular transactions can be resolved as 'out of scope' or 'patron related', which may extend the completion date of this work.
- b. Where a bank account is found to include patron transactions, it will then form part of the patron data review work. We will need to request bank statements for the full seven year period which may impact the completion dates for certain work from this point onwards for the Patron data workstream. We will seek to identify any bank accounts containing patron transactions as soon as possible to minimise impact on overall timetables.

Patron Analysis and Review

- a. The completeness of individual data sets is critical to the efficient completion of our work. At times, it may ultimately be more efficient to hold off conducting certain analysis until complete (or materially complete) individual data sets are available. This may lead to a delay in commencement and / or completion of certain work within this workstream. Where this is expected to occur, we will notify Crown and agree any necessary mitigating steps.
- b. As at the date of this document we are not able to provide an accurate work effort and cost estimate for Phase 2 items (iv) and (v) in the Engagement Letter Scope (i.e. further analysis of selected activity on patron accounts) on the basis that the precise nature and volume of work required will be directly informed by the output of the Phase 2, (iii) (i.e. Preliminary analysis and work prioritisation). As such, our current work effort and fees estimate is exclusive of the associated timeline and costs estimates for this specific work area. As the nature and volume of this work become clear, we will update this work effort estimate to include this.

Deloitte.

For discussion purposes only

Limitation of Use

This document is intended solely for the information and internal use of Crown in accordance with our engagement letter 22 February 2021 and is not intended to be and should not be used by any other person or entity. No other person or entity is entitled to rely, in any manner, or for any purpose, on this report. We do not accept or assume responsibility to anyone other than Crown for our work, for this report, or for any reliance which may be placed on this report by any party other than Crown.

Confidential - this document and the information contained in it are confidential and should not be used or disclosed in any way without our prior consent.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organisation"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Liability limited by a scheme approved under Professional Standards Legislation.

Member of Deloitte Asia Pacific Limited and the Deloitte organisation

© 2021 Deloitte Financial Advisory Pty Ltd