



**Crown Resorts Limited - Remediation Plan (as at 30 July 2021)**

#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
<b>Corporate governance and organisational structure</b>					
1.	<b>Board departures (Crown Resorts)</b>	<ul style="list-style-type: none"> <li>The following individuals have resigned as directors of Crown Resorts:               <ul style="list-style-type: none"> <li>Mr John Alexander (22 October 2020);</li> <li>Mr Michael Johnston (10 February 2021);</li> <li>Mr Guy Jalland (10 February 2021);</li> <li>Mr Andrew Demetriou (12 February 2021);</li> <li>Mr Ken Barton (15 February 2021);</li> <li>Mr Harold Mitchell (22 February 2021);</li> <li>Mr John Poynton (28 February 2021); and</li> <li>Professor John Horvath (15 April 2021).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Complete</li> </ul>	Helen Coonan	Complete
2.	<b>Board appointments (Crown Resorts)</b>	<ul style="list-style-type: none"> <li>Korn Ferry has been engaged to assist with finding candidates with relevant skills and experience for appointment to the Board.</li> <li>Mr Nigel Morrison commenced as an independent director of Crown Resorts on 6 April 2021. Mr Morrison has more than 20 years' experience in the gaming industry throughout Australasia and Asia.</li> </ul>	<ul style="list-style-type: none"> <li>Commencement of Bruce Carter as an independent director of Crown Resorts, following receipt of regulatory approvals.</li> <li>Recruitment of further individuals as independent directors of Crown Resorts, subject to receipt of</li> </ul>	Helen Coonan	Additional directors appointed by 30/09/21, subject to regulatory approval.



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		<ul style="list-style-type: none"> <li>Mr Bruce Carter has been appointed as an independent director of Crown Resorts, subject to the receipt of regulatory approvals. Mr Carter has more than 40 years' experience in a range of public and private sector industries, including more than a decade in the gaming industry.</li> <li>The appointment of an independent Chairman to the Board.</li> </ul>	regulatory approvals. At this stage, Crown Resorts is targeting a Board composition comprising of 7 directors in addition to the Managing Director.		
3.	<b>Subsidiary Board composition</b>	<ul style="list-style-type: none"> <li>Ken Barton resigned as a director of Crown Sydney Gaming (15 February 2021). Helen Coonan appointed as a director of Crown Sydney Gaming.</li> <li>Ken Barton resigned as a director of Crown Melbourne (15 February 2021). John Horvath resigned as a director of Crown Melbourne (15 April 2021). Xavier Walsh appointed to the Crown Melbourne Board (15 February 2021). Nigel Morrison appointed to the Crown Melbourne Board (27 April 2021).</li> <li>Ken Barton resigned as a director of Burswood Ltd (Crown Perth) on 15 February 2021. Barry Felstead and John Poynton resigned as directors of Burswood Ltd on 1 January 2021 and 15 April 2021 respectively. Helen Coonan appointed to the board of Burswood Ltd on 18 February 2021. Lonnie Bossi appointed to the board of Burswood Ltd on 1 March 2021.</li> </ul>	Governance structure under consideration (see row #5).	Helen Coonan	Subject to governance structure review (see #5)



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4.	<b>Continuing education for Directors</b>	<ul style="list-style-type: none"> <li>A new face-to-face AML/CTF training module was delivered to the Boards of Crown Resorts, Crown Sydney, Crown Melbourne and Crown Perth on 8 March 2021.</li> <li>Crown is in discussions with the Australian Institute of Company Directors (<b>AICD</b>) to arrange enrolments in the Company Directors Course for directors of Crown's licensed entities who have not previously completed the course. Crown is also investigating comparable programs for directors offered through the Governance Institute of Australia, given the AICD Company Directors Course is fully booked for several months.</li> <li>Crown is in consultation with the Ethics Centre to understand opportunities for independent programs covering issues connected to corporate governance and culture.</li> <li>Discussions with the Governance Institute and alternative suppliers have taken place.</li> </ul>	<ul style="list-style-type: none"> <li>The People, Remuneration and Nomination (<b>PRN</b>) Committee is overseeing the development and implementation of induction and continuing professional development programs for directors, including requiring annual AML/CTF training and requiring any new directors in future to attend induction AML/CTF training and appropriate governance courses offered through the AICD and Governance Institute of Australia.</li> <li>At its June 2021 meeting the Crown Resorts Board considered an update on this project and delegated responsibility to the PRN Committee to continue the development of a rolling three-year calendar of training. This proposed calendar will be presented for consideration at the PRN Committee meeting in August.</li> </ul>	Toni Korsanos / Tanya Baine	August 2021



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			<ul style="list-style-type: none"> <li>Formal training will be supplemented by a continuing professional development program for directors facilitated by an external expert provider.</li> </ul>		
5.	<b>Governance structure</b>	<ul style="list-style-type: none"> <li>Consideration being given to implementing a centralised governance structure for the Crown group.</li> <li>The Board provided in principle approval for the proposal in September 2020 and June reaffirmed its commitment to reform in this area subject to regulatory engagement.</li> <li>REDACTED PRIVILEGE</li> </ul>	<ul style="list-style-type: none"> <li>REDACTED PRIVILEGE</li> <li>At the 15 June 2021 Crown Resorts Board meeting it was resolved that the Company would write to regulators to explain the changes contemplated by this reform initiative with the objective of seeking regulator feedback.</li> <li>Crown is considering this proposed reform project further in light of matters raised by the Victorian and Western Australian Royal Commissions.</li> </ul>	Betty Ivanoff	The timetable for progressing this reform project will be determined as part of Crown's further consideration of the matters raised at the Victorian and Western Australian Royal Commissions.
6.	<b>Organisational restructure</b>	<ul style="list-style-type: none"> <li>A new organisational structure was announced in December 2020 (and further supplemented in February 2021). Key changes include: <ul style="list-style-type: none"> <li>New Compliance and Financial Crime department created,</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Subject to ongoing review and refinement by newly appointed CEO.</li> </ul>	Steven McCann	N/A



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		<p>independent of business units, with the creation of a new Chief Compliance and Financial Crime Officer with direct reporting lines to the CEO (or equivalent) and Board.</p> <ul style="list-style-type: none"> <li>• Risk and Internal Audit functions separated and reporting lines elevated, with the creation of a new Chief Risk Officer role reporting directly to the CEO (or equivalent) with a reporting line to the Risk Management Committee.</li> <li>• Creation of a group HR function to drive cultural consistency throughout the organisation, with the creation of a new Chief People and Culture Officer reporting directly to the CEO (or equivalent) with reporting lines to the PNR and OH&amp;S Committees.</li> <li>• Separation of the General Counsel and Company Secretary role.</li> <li>• The appointment of new legal advisor to Crown and a separate legal advisor to the Board.</li> <li>• New roles:                             <ul style="list-style-type: none"> <li>• Chief Compliance and Financial Crimes Officer;</li> <li>• Chief People and Culture Officer; and</li> </ul> </li> </ul>			



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		<ul style="list-style-type: none"> <li>Group General Manager - Internal Audit.</li> <li>Roles removed:               <ul style="list-style-type: none"> <li>CEO Australian Resorts; and</li> <li>Chief Legal Officer Australian Resorts.</li> </ul> </li> </ul>			
7.	<b>Senior management renewal</b>	<ul style="list-style-type: none"> <li>Mr Barry Felstead and Mr Joshua Preston departed Crown and, as a result of a restructure, the roles previously held by these individuals no longer exist.</li> <li>Mr Barton is no longer in the role of CEO, replaced temporarily by Ms Coonan as Executive Chairman.</li> <li>Mr Steven McCann commenced as Chief Executive Officer and Managing Director on 1 June 2021 but will not act in a licenced capacity until regulatory approvals are received.</li> <li>The role of General Counsel and Company Secretary has been split into two separate roles and Mary Manos has departed Crown with Crown's Chief Financial Officer, Alan McGregor acting as the interim Company Secretary and Stuart McCulloch (Partner, Allens) acting as the interim General Counsel.</li> <li>Ms. Betty Ivanoff commenced as General Counsel on 21 June 2021 but will not act in</li> </ul>		Steven McCann	



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		<p>a licenced capacity until regulatory approvals are received.</p> <ul style="list-style-type: none"> <li>Ms Anne Siegers' role has changed from Group General Manager, Risk and Audit to Chief Risk Officer, reporting directly to the CEO (or equivalent) with a reporting line to the Risk Management Committee.</li> <li>Mr Steven Blackburn commenced as the Chief Compliance and Financial Crime Officer on 24 February 2021. He reports to the CEO (or equivalent) and has a reporting line to the Board.</li> <li>Mr Tony Weston commenced as the new Chief People and Culture Officer. He reports to the CEO (or equivalent) and has a reporting line to the People, Remuneration and Nomination Committee.</li> <li>Ms Jessica Ottner commenced as the Group General Manager – Internal Audit, and commenced on 10 May 2021. Ms Ottner has a functional reporting line to the CFO and has a direct reporting line to the Audit and Corporate Governance Committee.</li> <li>Mr Nick Weeks commenced on 11 March 2021 as Executive General Manager – Transformation &amp; Regulatory Response. He reports to the CEO (or equivalent).</li> <li>Mr Nisbett, Crown's Executive Vice President Strategy &amp; Development, left Crown on 30 June 2021.</li> </ul>			



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		<ul style="list-style-type: none"> <li>Mr Crinis, the CEO of Crown Sydney and Crown Hotels will leave the business on or before December 2021.</li> <li>Mr Andre Ong, Crown Resorts Group Chief Information Officer, will leave the organisation at a date to be determined in the coming months.</li> </ul>			
8.	VIP Business Restructure	<ul style="list-style-type: none"> <li>In January 2021, the Board approved the transition to an Australian based VIP model, with the closure of all remaining offshore offices and the cessation of employment of overseas domiciled sales team employees.</li> <li>Crowns offices in Hong Kong and Auckland closed on 28 February 2021 and all overseas domiciled positions were made redundant on that date.</li> <li>A restructure of the operational functions has been completed. VIP will now operate solely as an Australian-based Business Development function reporting to Xavier Walsh (Crown Melbourne CEO). The remaining operational roles for the VIP business have been integrated within existing Crown Melbourne functions (e.g. Finance, Marketing, Business Operations).</li> <li>The Australian based VIP model will ultimately report to Xavier Walsh (CEO Crown Melbourne).</li> </ul>	<ul style="list-style-type: none"> <li>REDACTED - PRIVILEGE</li> <li>Future approach to marketing to international players has not been determined. As international borders reopen Crown will consider how it will promote its resorts to international business</li> <li>REDACTED - PRIVILEGE</li> <li>The future approach to marketing to international players at Crown Perth will be designed with reference</li> </ul>	Xavier Walsh	REDACTED - PRIVILEGE





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		<ul style="list-style-type: none"> <li>VIP Executives Roland Thieler, Jacinta Maguire and Ishan Ratnam have now departed Crown.</li> <li>Crown has ceased dealings with Junket operators (see #35), and in relation to Western Australia, has ceased dealing with all international program players as directed by the Gaming &amp; Wagering Commission of WA.</li> </ul>	to the 23 February 2021 Gaming & Wagering Commission direction in relation to International Program Play and junkets.		
<b>CPH Relationship</b>					
9.	<b>Termination of agreements</b>	<ul style="list-style-type: none"> <li>Services Agreement and Controlling Shareholder Protocol were terminated on 21 October 2020.</li> </ul>	<ul style="list-style-type: none"> <li>Complete.</li> <li>Crown is willing to undertake to Regulators that similar arrangements will not be entered into in the future should this be required.</li> </ul>	Helen Coonan	Complete
10.	<b>Resignation of directors</b>	<ul style="list-style-type: none"> <li>Mr Johnston, Mr Jalland and Mr Poynton have resigned from the Crown Resorts Board.</li> </ul>	<ul style="list-style-type: none"> <li>CPH no longer has separate representation on the Board of Crown.</li> </ul>	Helen Coonan	Complete
11.	<b>Controls on the influence of CPH</b>	<ul style="list-style-type: none"> <li>Refer to items 9 and 10 above.</li> <li>Crown understands that additional undertakings have been provided by CPH to ILGA.</li> </ul>	<ul style="list-style-type: none"> <li>Complete.</li> </ul>	Helen Coonan	Complete
<b>AML/CTF Change Program</b>					
12.	<b>Financial Crime Resourcing and Team Structure</b>	<ul style="list-style-type: none"> <li>A new Compliance and Financial Crime department independent of business units</li> </ul>	<ul style="list-style-type: none"> <li>On 15 June 2021, 14 of the senior positions proposed under the Financial Crime</li> </ul>	Steve Blackburn / Nick Stokes	September 2021



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		<p>has been created with direct reporting lines to the Board.</p> <ul style="list-style-type: none"> <li>• Steve Blackburn commenced as the Chief Compliance and Financial Crime Officer on 24 February 2021.</li> <li>• Nick Stokes, Group General Manager - AML and Group Money Laundering Officer, was appointed as AML/CTF Compliance Officer for each of the Crown reporting entities on 2 November 2020.</li> <li>• Further new Financial Crime roles have been created and appointed: <ul style="list-style-type: none"> <li>• Jon Yeats, Group Senior Manager Financial Crime – Customer Investigations (commenced 21 October 2020);</li> <li>• Rita Pessutto, Financial Crime Investigations Officer Melbourne (commenced 19 October 2020);</li> <li>• Libby Stevens, Group Senior Analyst Financial Crime – Customer Investigations (commenced 21 December 2020);</li> <li>• Gary Chan, Group Financial Crime Manager – Data Analytics (commenced 21 December 2020);</li> <li>• Christian Robinson, Financial Crime Manager Sydney (commenced 14 December 2020);</li> </ul> </li> </ul>	<p>and Compliance Change Program were advertised both internally and externally including:</p> <ul style="list-style-type: none"> <li>• Group Executive General Manager - Financial Crime Risk and MLRO (filled);</li> <li>• Group Executive General Manager - Financial Crime Operations (filled);</li> <li>• Group General Manager - Financial Crime Governance;</li> <li>• Group General Manager - Financial Crime Advisory;</li> <li>• Group General Manager - Financial Crime Intelligence Unit;</li> <li>• Group General Manager - Financial Crime and Compliance Assurance;</li> </ul>		



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		<ul style="list-style-type: none"> <li>Akshay Jain and Peter Le, 2x Group Financial Crime Analysts (commenced 4 January 2021);</li> <li>Danielle Slattery, Financial Crime Manager Perth (commenced 18 January 2021);</li> <li>Radek Stopka, Group Senior Manager Financial Crime – Customer Intelligence and Due Diligence (commenced 11 January 2021);</li> <li>Elizabeth Hannah, Financial Crime Investigations Officer Sydney (commenced 1 March 2021), promoted to Sydney Financial Crime Analyst on or around 10 May 2021;</li> <li>Michael Marinis, Financial Crime Project Manager (commenced on 24 March 2021);</li> <li>David Njuguna, Financial Crime Perth Analyst (commenced on 10 May 2021);</li> <li>Joey Chu, Group Financial Crime Analyst (commenced on 17 May 2021);</li> <li>Brian Jeong and Brianna McFarlane, 2x Group Financial Crime Analysts appointed</li> </ul>	<ul style="list-style-type: none"> <li>Group General Manager - Financial Crime and Compliance Solutions;</li> <li>Group Head of Financial Crime and Compliance Change Management and Communications;</li> <li>Group Head of Financial Crime and Compliance Customer Intelligence and Due Diligence;</li> <li>Group Head of Financial Crime and Compliance Data Analytics;</li> <li>Group Head of Financial Crime and Compliance Assurance;</li> <li>Group Head of Financial Crime and Compliance Assurance Solutions;</li> </ul>		



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		<p>(commenced on 31 May 2021 and 7 June 2020 respectively); and</p> <ul style="list-style-type: none"> <li>• Laura Jones, appointed as Group Senior Manager Financial Crime - Assurance &amp; Testing commencing 28 June 2021.</li> <li>• Dan Rule, appointed as EGM Financial Crime and Compliance Operations, commencing 1 September 2021.</li> <li>• Armina Antoniou, appointed as EGM Financial Crime Risk and MLRO, commencing on a date to be determined before 31 October 2021.</li> </ul> <ul style="list-style-type: none"> <li>• On 24 May 2021 the Board approved a plan presented by Mr Blackburn for the future direction, capabilities and structure of the Financial Crime &amp; Compliance team. More detail on this plan is described in row #25. Among other things, the plan authorised an increase in FTE in the team from 56 to 111. Recruiting of the additional 55 FTEs approved by the Board in the plan has commenced, with an ambitious goal of completing recruiting by the end of September 2021. In the interim, resources will be provided by PwC to maintain the pace of reform in the Financial Crime and Compliance team.</li> </ul>	<ul style="list-style-type: none"> <li>• Group Head of Financial Crime Investigations and Screening; and</li> <li>• Group Head of Financial Crime Reporting</li> </ul> <ul style="list-style-type: none"> <li>• Interviews for Group General Manager roles are planned to conclude at the end of July with offers to be made thereafter.</li> </ul>		



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13.	<b>ML/TF Risk Assessment</b>	<ul style="list-style-type: none"> <li>Promontory was engaged in September 2020 to provide Crown with an assessment of potential financial crime vulnerabilities in its business, and a forward-looking strategic assessment of capabilities to manage the risks associated with financial crime.</li> <li>The Draft Phase 1 Promontory report outlining potential vulnerabilities was received on 29 March 2021 and issued in final form on 24 May 2021. In addition to informing the enterprise-wide ML/TF risk assessment, the Financial Crime team have reviewed the report and have identified proposed controls to address vulnerabilities identified in the report. Those controls were approved by the Crown Resorts Board as an element of the broader plan presented by Steve Blackburn on 24 May 2021 (see row #25).</li> <li>The vulnerabilities identified in the Promontory report will be used to inform enterprise-wide ML/TF risk assessment.</li> <li>On 15 May 2021 Mr Blackburn presented an update to the Crown Resorts Limited Board on steps to address recommendations in the Promontory AML Vulnerability Assessment.</li> <li>Crown (with the assistance of PwC) have established an ML/TF EWRA Design Authority that meets fortnightly.</li> <li>Initial Business Unit workshops were conducted in late June and throughout July</li> </ul>	<ul style="list-style-type: none"> <li>Following business unit workshops, relevant business units will be engaged to further inform their understanding of specific ML/TF risks relevant to specific business units and the controls in place to mitigate those risks.</li> <li>PwC has assisted Crown to develop a Risk Assessment Framework, which provides a high-level overview of the design, interaction and key features of the ML/TF Risk Assessment (RA) ecosystem as it relates to Crown, it's Reporting Entities and in-scope Business Units.</li> <li>The ML/TF Design Authority endorsed the Risk Assessment Framework at its meeting on 22 July 2021.</li> </ul>	Steve Blackburn / Nick Stokes	<p>The current timeline will see the further following deliverables:</p> <ul style="list-style-type: none"> <li>high level design of the ML/TF Risk Assessment Framework - July 2021 (complete)</li> <li>ML/TF methodology design principles, approach and development - September 2021</li> <li>ML/TF Enterprise-Wide Risk Assessment Report -November 2021</li> <li>Board approval of the ML/TF Enterprise-Wide Risk Assessment Report -November 2021</li> </ul>



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		to ensure understanding of the specific Business Unit operations across each Crown location as an input into understanding the size, nature and complexity of operations, the inherent risks and mitigating controls.			
14.	<b>AML / CTF Program</b>	<ul style="list-style-type: none"> <li>As part of Crown's ongoing roll-out of the AML/CTF Change Program, a Joint AML/CTF Program (comprising the AML/CTF Policies and Procedures, and Part B Program) (<b>Joint AML/CTF Program</b>) was endorsed by the Crown Resorts Board for adoption by each of Crown's reporting entities. Part A was approved by the boards of each of the reporting entities, being Crown Sydney, Crown Melbourne and Crown Perth, on 2 November 2020.</li> <li>Among other things, Part A of the new Joint AML/CTF Program provides for greater Board and senior management oversight and responsibility for driving a positive culture of AML/CTF compliance (see item row #15 below for more information).</li> <li>Under the Joint AML/CTF Program, the AML/CTF Compliance Officer has responsibility for the continued compliance of each of the reporting entities with the requirements of the AML/CTF Act and the AML/CTF Rules, as well as the Joint</li> </ul>	<ul style="list-style-type: none"> <li>Continuing embedment of the Joint AML/CTF Program with oversight and guidance from Mr Blackburn.</li> <li>Transitioning existing operating procedures that give effect to the Joint AML/CTF Program to a contemporary, centralised policy hierarchy that will be consistent across properties that is driven by legislation with a clear risk appetite statement and group policies to set consistent expectations on practices to be met across the Group.</li> <li>REDACTED - PRIVILEGE</li> </ul>	Steve Blackburn / Nick Stokes / Stephen Hancock	<p>Transition of existing procedures to an uplifted Policy and Standards is proposed to be complete by 30 October 2021 with additional procedures and guidance to follow.</p> <p>Ongoing refinement and embedment of Program</p>



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		<p>AML/CTF Program. Under sections 7.1 and 19 of the Part A Program the AML/CTF Compliance Officer has a direct reporting line to the Crown Resorts Board and both an opportunity and requirement to raise significant AML/CTF matters.</p> <ul style="list-style-type: none"> <li>The Joint AML/CTF Program also includes a revised transaction monitoring program (<b>TMP</b>). This includes the introduction of an automated TMP through Sentinel and manual transaction monitoring.                             <ul style="list-style-type: none"> <li>Sentinel is discussed further in item 17 below.</li> <li>As part of the manual aspect of the TMP, Crown has implemented an internal process for the generation of Unusual Activity Reports (<b>UARs</b>), which are submitted internally for review by the Financial Crime team pursuant to the AML/CTF Policies and Procedures. The Financial Crime team then decides whether to file a suspicious matter report (<b>SMR</b>) with AUSTRAC and/or to conduct enhanced customer due diligence.</li> </ul> </li> <li>The relevant business stakeholders approved and endorsed the Business Unit Standard Operating Procedures to give effect to the new Joint AML/CTF Program.</li> </ul>	<p>REDACTED - PRIVILEGE</p> <ul style="list-style-type: none"> <li>Independent Review of Joint AML/CTF Program in the fourth quarter of 2021, see row 23 for further detail.</li> </ul>		



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		<ul style="list-style-type: none"> <li>• Crown has also adopted a number of specific policies and procedures aimed at mitigating further its exposure to money laundering risk, including:               <ul style="list-style-type: none"> <li>• On 21 October 2020 Crown communicated to its staff that it would no longer permit junkets or other customers to utilise money remitters. At this time, Crown also reminded its staff that it would no longer authorise third party transfers without the written approval of the property CEO (or equivalent) or the Group General Manager, AML<sup>[1]</sup>. On 16 November 2020 Crown introduced the formal Third-Party Transfers and Remitters Policy which articulates this.</li> <li>• On 16 November 2020 Crown issued a Significant Cash Policy direction from the Chief Executive Officer, which prohibited:                   <ul style="list-style-type: none"> <li>• cash deposits at the cage over \$250,000;</li> <li>• cash deposits at the cage over \$200,000 unless a source of funds declaration was provided</li> </ul> </li> </ul> </li> </ul>			

<sup>[1]</sup> Note that this exception by written approval does not apply to Crown Perth.





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		<p>by the patron depositing the cash and written approval was provided from the respective property COO (or equivalent) or the CFO Australian Resorts and either the Group AML/CTF Compliance Officer or the Group GM Risk &amp; Audit (or equivalent); and</p> <ul style="list-style-type: none"> <li>• cash deposits at the cage over \$100,000 unless a source of funds declaration was provided by the patron depositing the cash and approval was given by the Cage Supervisor for the deposit.</li> <li>• On 5 December 2020, Crown issued a Corporate Policy Statement on Source of Funds for cash transactions at the cage or a gaming location. The Policy was revised on 22 February 2021, and now provides that if a customer reaches the following cash deposit limits on a calendar day at the cage or a gaming location, the following specific actions must be taken: <ul style="list-style-type: none"> <li>• all cash transactions of \$10,000 or more require a</li> </ul> </li> </ul>			



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		<p>[REDACTED]</p> <ul style="list-style-type: none"> <li>for cash deposited during a calendar day in the amount of \$50,000 - \$149,999, a source of funds declaration must be completed by the patron and approved by the Cage Supervisor or Table Games Manager [REDACTED]</li> <li>for cash presented for a calendar day between \$150,000 and \$200,000<sup>1</sup>, a source of funds declaration must be completed by the patron and approved by the respective property CEO, CFO (or designee) and either Group AML/CTF Compliance Officer or Group GM Risk and Audit Manager (or designee). A [REDACTED]</li> </ul>			

<sup>1</sup> At Crown Perth this applies for amounts greater than \$50,000



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		<p>[REDACTED]</p> <ul style="list-style-type: none"> <li>cash amounts of \$200,000 or more are prohibited and will not be accepted in any circumstances (which includes accumulated transactions in a calendar day); and</li> <li>single cash buy ins for \$100,000 (revised to \$50,000 on 10 March 2021 in Melbourne and to \$20,000 in Perth) or more at a table, must be referred to the cage and a source of funds declaration must be completed by the patron and approved by the Cage Supervisor or Table Games Manager.</li> </ul> <p>[REDACTED]</p> <p>These are in addition to specific controls adopted in relation to Crown's bank accounts, which are summarised in item 16 below.</p> <ul style="list-style-type: none"> <li>On 18 February 2021, the \$250,000 threshold in the</li> </ul>			



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		<p>Significant Cash Deposit Policy direction was reduced to \$200,000, the \$200,000 threshold was reduced to \$150,000 and the \$100,000 threshold was reduced at Crown Melbourne (and Crown Sydney, to the extent it is permitted to operate a casino licence) to \$50,000 and to \$20,000 for Crown Perth. For this lower threshold the Policy was also amended so that a Cage Supervisor or above can approve the deposit provided the patron provides a source of funds declaration.</p> <ul style="list-style-type: none"> <li>• On 21 May 2021, Crown implemented a further direction to the Significant Cash Policy to lower the cash deposit thresholds at the cage for Crown Melbourne and Crown Sydney, as follows:                             <ul style="list-style-type: none"> <li>• from \$50,000 to \$25,000 for cash deposits at the cage that require a source of funds declaration (implemented 21 May 2021); and</li> <li>• from \$150,000 to \$100,000 for cash deposits at the cage</li> </ul> </li> </ul>			





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		<ul style="list-style-type: none"> <li>requiring a source of funds declaration and approval from Crown,<sup>3</sup>and</li> <li>a restriction on any single or cumulative transaction(s) totalling \$150,001 or more in cash for a customer on a calendar day</li> <li>On 21 May 2021, Crown determined not to accept 'Other Casino Cheques' or 'Telegraphic Transfers' sent from other casinos on behalf of Crown's customers. In addition, Crown will no longer send Telegraphic Transfers directly to another Casino on behalf of our customers. As a result of this decision, customers may only send funds to Crown from their personal bank account, and Crown will only remit funds directly to a customer's personal bank account. These changes came in with immediate effect.</li> </ul>			
15.	<b>AML reporting structures and governance</b>	<ul style="list-style-type: none"> <li>The Joint AML/CTF Program creates a prescriptive framework for both formal reporting and informal escalation of AML/CTF related matters. It provides for Crown Board oversight of AML/CTF matters</li> </ul>	<ul style="list-style-type: none"> <li>Existing financial crime and compliance reporting to the Board and senior management is largely fact-based narrative and</li> </ul>	Steve Blackburn / Nick Stokes	Ongoing refinement





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		<p>and requires quarterly reporting to the Crown Board and monthly reporting to Crown senior management and that material AML/CTF matters be escalated at each Crown Board meeting or as frequently as required.</p> <ul style="list-style-type: none"> <li>The AML/CTF Policies and Procedures provide that the Board and senior management of both Crown Resorts and each reporting entity are the owners of ML/TF risk. Pursuant to s 7.5 of the Part A Program, significant AML/CTF matters will also be raised with a newly established AML/CTF Committee which in turn will report matters to the Executive Risk and Compliance Committees (<b>ERCC</b>) of each Crown reporting entity.</li> <li>The Group AML/CTF Committee met quarterly and comprised representatives from each of the relevant business units of each Crown entity. The Group AML/CTF Committee met in January 2020, November 2020 and January 2021.</li> <li>The Crown Financial Crime team has also provided updates to the ERCCs in Melbourne and Perth as follows:                             <ul style="list-style-type: none"> <li>in November 2020, January 2021, May 2021 in Melbourne; and</li> <li>in November 2020, February 2021 and May 2021 in Perth.</li> </ul> </li> </ul>	<p>metrics. Informed by metrics provided by the business and assurance and audit testing results provided by the second line assurance team and internal audit, the Financial Crime team is developing reporting that will focus on changes to Crown's financial crime and compliance risk profiles as well as emerging risks facing Crown based on internal and external intelligence gathering.</p> <ul style="list-style-type: none"> <li>To improve governance and to assist the Board and senior management in discharging their oversight responsibilities with respect to financial crime, Mr Blackburn is proposing to replace the existing Group AML/CTF Committee with a new Financial Crime Oversight Committee (FCOC) that is accountable to the Board.</li> <li>A new Financial Crime Working Group (FCWG)</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>The agenda for the Melbourne ERCC, as well as the Perth ERCC includes a standing AML/CTF agenda item.</li> <li>The agenda for the Crown Resorts Board includes a standing AML/CTF agenda item. Detailed AML/CTF updates were provided to the Crown Resorts Board in November 2020 and February 2021.</li> <li>The agenda for the Crown Resorts Risk Management Committee includes a standing AML/CTF agenda item.</li> <li>The Sydney ERCC has been formed and is operational with the first meeting held on 21 May 2021</li> </ul>	<ul style="list-style-type: none"> <li>will be established that is accountable to the FCOC.</li> <li>Each of the FCOC and FCWG will focus on material financial crime matters. To drive accountability, the business will present to each committee meeting on how they are meeting their financial crime obligations.</li> <li>Charters for the FCOC and FCWG are being finalised for approval at the first meeting of the FCOC and FCWG.</li> </ul>		
16.	<b>Riverbank / Southbank and enhanced Patron Account Controls</b>	<ul style="list-style-type: none"> <li>The Riverbank and Southbank bank accounts were closed in December 2019. Since that time, neither Riverbank nor Southbank has operated a bank account.</li> <li>The only patron accounts for Crown's gaming operations across Crown Melbourne, Crown Perth (Burswood Nominees) and Crown Sydney are onshore bank accounts in the name of the respective licensee.</li> <li>A direction was issued to relevant Crown staff in Perth on 24 September 2020, and in Melbourne on 12 November 2020, that under no circumstances should transactions be aggregated in Crown's casino</li> </ul>	<ul style="list-style-type: none"> <li>Financial Crime are nearing completion of the lookback for all transactions referenced in Appendix A and B of the Initialism report. These specifically relate to approximately 134 instances that are indicative of structured or large cash deposits into Riverbank and Southbank accounts. Financial Crime also intend to undertake a quality assurance process</li> </ul>	Steve Blackburn / Nick Stokes / Patricia Chin	<p>The 'lookback' work continues, and the results of Phase 2 of the Deloitte forensic review will also form part of the look back.</p> <p>The anticipated completion date of Phase 2 of the Deloitte forensic review is currently 17 August 2021 (draft report due).</p>



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>management system. This direction was also incorporated into Crown Melbourne and Crown Perth SOPs in October 2020. Additional controls have been implemented over Crown's patron bank accounts to mitigate the risk of criminal exploitation (the <b>Patron Account Controls</b>), including:</p> <ul style="list-style-type: none"> <li>On 8 April 2020, an Executive Office Memorandum was circulated to relevant Crown employees informing them that Crown will no longer make or receive payments to or from third parties without prior written approval from the property CEO or equivalent and the AML/CTF Compliance Officer. This direction was further memorialised in another Executive Office Memorandum on 31 July 2020 with further instructions on the ban on all third party transfers and a Q&amp;A for staff on what they are to do if a customer approaches Crown requesting to transfer funds to a third party, or requesting that a third-party be able to transfer funds to Crown.</li> <li>On 16 November 2020 (pursuant to cl 7.5(i) of the Part A Program and cl 6.2.3 of the AML/CTF Policies and Procedures) Crown introduced a manual rule for bank statement</li> </ul>	<p>of SMRs submitted through the Appendix A and B lookbacks.</p> <ul style="list-style-type: none"> <li>The remaining Appendix (C-G) will be the subject of a further phase of lookback work. These appendices list approximately 788 transactions of varying types which Initialism have advised may be indicative of money laundering.</li> <li>The patrons associated with transactions identified in Appendix A &amp; B by GT/Initialism have been subject to the Significant Player Review (described in row 37 below), with 18 of those patrons issued a withdrawal of licence (12 of which were withdrawn prior to the SPR review).</li> <li>[REDACTED]</li> </ul>		





#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>monitoring, which requires bank statements be monitored weekly and cash deposits reviewed to identify suspicious transactions.</p> <ul style="list-style-type: none"> <li>On 16 November 2020, Crown adopted the Third-Party Transfers and Money Remitters Policy (the <b>Third Party Policy</b>). The Third-Party Policy notes that Crown:                             <ul style="list-style-type: none"> <li>does not accept payments from third parties (including money remitters) into its accounts for the benefit of a Crown customer; and</li> <li>will not make payments to third parties (including money remitters) on behalf of a Crown customer.</li> </ul> </li> </ul> <p>The Third Party Policy prescribes a detailed procedure to be followed if a departure from the default position of not accepting payments from third parties is to be approved.</p> <ul style="list-style-type: none"> <li>On 4 January 2021, Crown implemented the Return of Funds Policy, which states that Crown will:                             <ul style="list-style-type: none"> <li>only accept payments that are transferred into its</li> </ul> </li> </ul>	<div style="background-color: black; width: 100%; height: 100%;"></div> <ul style="list-style-type: none"> <li>Refer also to item 24 below.</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>bank account from personal bank accounts belonging to the patron seeking to transfer funds to Crown;</p> <ul style="list-style-type: none"> <li>• return all of the following types of payments:                             <ul style="list-style-type: none"> <li>(a) cash deposits;</li> <li>(b) funds transferred from a company or trust bank account (unless approved);</li> <li>(c) funds transferred by a third party for the benefit of a Crown patron account (unless approved);</li> <li>(d) funds transferred when the description or narration is misleading as to purpose; and</li> <li>(e) funds transferred where the patron has</li> </ul> </li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>not provided a receipt or supporting documentation.</p> <ul style="list-style-type: none"> <li>To date approximately 100 SMRs have been lodged with AUSTRAC in relation to the transactions identified as a result of both Crown's internal investigation and Appendix A and B Initialism report.</li> </ul>			
17.	Transaction Monitoring Program / Sentinel	<ul style="list-style-type: none"> <li>Crown's new Joint AML/CTF Program includes a revised transaction monitoring program (<i>TMP</i>).</li> <li>Crown has rolled out an automated TMP through Sentinel. Sentinel has two features: (i) it automatically monitors and alerts for transactions (the <i>Rules Feature</i>) and (ii) allows Crown to view a 'Customer Intelligence' dashboard which provides a summary of the customer's profile and their gaming and transaction activity.</li> <li>[REDACTED]</li> </ul>	<ul style="list-style-type: none"> <li>Initialism provided their final transaction monitoring review on 28 June 2021.</li> <li>Initialism's report confirms that Crown's transaction monitoring program includes appropriate systems and controls to meet its obligations under s 36(1) of the AML/CTF Act and meets the requirements of Chapter 15 of the AML/CTF Rules.<sup>4</sup> Initialism also expressed the view that the Crown Group has refined and evolved its transaction monitoring program to address the findings of Initialism's review in 2019. Initialism noted that to</li> </ul>	Steve Blackburn / Nick Stokes	Crown has begun addressing the observations and recommendations made in Initialism's report.

<sup>4</sup> CRW.512.072.0128 Initialism Report – Crown Resorts Limited Transaction Monitoring Review Report (20 May 2021) at .0003-.0004.



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• Financial Crime continues to work with the IT team and Unifii to digitise the dispositioning and triage process for Sentinel RBA.</li> <li>• Financial Crime is working with the IT team to scope user requirements for a case management system.</li> <li>• Initialism provided their draft transaction monitoring source information review in April</li> </ul>	<p>ensure that current monitoring continues to evolve, Crown must ensure that it continues to increase its Financial Crime resources and ensure that current monitoring and planned refinements to monitoring are not adversely impacted by resource constraints.</p> <ul style="list-style-type: none"> <li>• Initialism made a number of recommendations and observations in relation to the manual and automated monitoring processes which will be considered by Crown.</li> <li>• Incorporating standalone alerts into RBA model and further development of additional alerts to address other areas of transaction risk.</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>2021. The review noted that Crown has addressed the recommendations in the April 2019 Review.</p> <ul style="list-style-type: none"> <li>Crown has provided feedback to Initialism on its draft report and received a revised draft on 15 May 2021. Crown provided further feedback to Initialism with a third draft received on 12 June. Final feedback has now been provided to Initialism and the final report will be provided to Regulators.</li> <li>[REDACTED]</li> <li>Monitoring and alerts are ready for Sydney once the casino opens.</li> </ul>			
18.	<b>Regulatory Reporting (IFTIs/ SMR/ UARs and TTRs)</b>	<ul style="list-style-type: none"> <li>As noted above at item 14, Crown has developed a new UAR process as a way to systematise internal reporting of unusual activity for a determination by the Financial Crime team as to whether a SMR should be filed with AUSTRAC.</li> <li>[REDACTED]</li> </ul>	<ul style="list-style-type: none"> <li>Financial Crime has worked with the IT team to make the necessary system updates so Crown can resubmit a test TTR file to AUSTRAC for review. Crown is awaiting system development from IGT before resubmitting another test file to AUSTRAC.</li> <li>Crown is working on a manual IFTI file to send to AUSTRAC for review in advance of the system development from IGT. Most of the changes from</li> </ul>	Steve Blackburn / Nick Stokes	Continuing refinement. IFTI uplift timetable to be determined as part of PwC scope.



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>• Financial Crime also uses the AML Portal to generate investigation reports and SMR decisioning forms.</li> <li>• Sydney specific - Crown has set up a test reporting account with AUSTRAC for Crown Sydney to test the bulk upload process for TTR and IFTI files is working and in compliance with the AML/CTF Rules.</li> <li>• Sydney Specific - The first TTR test file generated from the Sydney CMS has been sent to AUSTRAC for review. AUSTRAC's full XML Test File Assessment Report was received on 20 May 2021. Financial Crime and the relevant IT teams are working to address the issues and observations identified in AUSTRAC's Assessment.</li> </ul>	<ul style="list-style-type: none"> <li>• the system update can be manually remediated for AUSTRAC testing purposes.</li> <li>• PwC has been engaged to assist Crown to uplift its IFTI reporting processes and controls.</li> </ul>		
19.	ECDD / KYC	<ul style="list-style-type: none"> <li>• Enhanced customer due diligence process has been adopted in Crown's AML/CTF Policies and Procedures (as part of the new Joint AML/CTF Program). The AML/CTF Policies and Procedures provide for a process in clause 3 regarding customer risk assessments, and how those customers who are high or critical risk are to be escalated.</li> <li>• On 12 November 2020 Crown also introduced its Escalation of Critical Risk Customer Policy, which requires specific</li> </ul>	<ul style="list-style-type: none"> <li>• Financial Crime is working with the Loyalty and IT team to introduce further mandatory fields into the customer registration process to enhance Crown's Customer Risk Assessment Process. The first of those mandatory fields is occupation, followed by citizenship and place of birth.</li> </ul>	Steve Blackburn / Nick Stokes	Additional mandatory fields will be introduced over time commencing in September (for the Occupation field), with the remaining fields to follow.



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>matters to be addressed to determine whether a critical risk customer should be retained; Crown has also introduced a new Persons of Interest (<b>POI</b>) Group Committee. This became active on 14 October 2020, with a decisioning tool developed and in operation (see items 35 – 38 below for further details on further patron specific controls implemented by Crown.)</p> <ul style="list-style-type: none"> <li>• The Financial Crime team have created a critical risk customer escalation form, where the default position is to exit the customer.</li> <li>• The Financial Crime team have deployed the escalation process contemplated under the Escalation of Critical Risk Customers Policy in place of the routine POI escalation process for customers identified as presenting material financial crime risk. This ensures that customers who present material financial crime risk are promptly escalated to the Chief Executive Officers of each Crown property for adjudication, with a recommendation provided by the Financial Crime team.</li> <li>• In circumstances where the Chief Executive Officers do not support the recommendation, the customer is then escalated to the Group Chief Compliance and Financial Crime Officer for adjudication, in their sole discretion.</li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
20.	AML/CTF Training	<ul style="list-style-type: none"> <li>As at 28 July 2021, 11,905 Crown employees (94%) have completed the AML/CTF Awareness Training.</li> <li>Further, 3,779 Crown Melbourne contractors have also completed the training.</li> <li>Targeted training has been delivered to 2,497 Crown staff. This training is face-to-face and is business-unit specific in table games, gaming machines, cage, security &amp; surveillance, hotels, and food &amp; beverage.</li> <li>All existing Business Operations Teams (BOT) and C-suite executives at all properties have also received targeted training save for recent additions to the BOT.</li> <li>Financial Crime conducted information sessions in late March covering the roll out of the AML Portal (the new digitised UAR and SMR workflow) for staff in the Crown Table Games, Gaming Machines and Cage business units. The information sessions provided relevant Crown employees in the casinos and the cage with an understanding of the UAR and SMR process and how to identify and escalate unusual activity through the new system and workflow. As noted above this digitised workflow and reporting capability is now operational.</li> <li>A new face-to-face AML/CTF training module was delivered to the Boards and senior management of Crown Resorts,</li> </ul>	<ul style="list-style-type: none"> <li>Crown will conduct refresher AML/CTF training for moderate and high-risk employees and contractors on an annual basis.</li> <li>A targeted training calendar has been developed in draft and a Financial Crime Training Manager is being recruited to roll out the training calendar across the group.</li> <li>To further advance the effectiveness of our training, the Financial Crime and Compliance Change Program will place a greater focus on financial crime outcomes by tying Crown's efforts in detecting and reporting potential financial crime to protecting those most vulnerable in our society. Additional and well documented targeted training will be delivered to high risk employee groups and senior management and Board training will be annualised.</li> </ul>	Steve Blackburn / Nick Stokes	Complete. Subject to continuous refinement.





#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		Crown Sydney, Crown Melbourne and Crown Perth on 8 March 2021.	<ul style="list-style-type: none"> <li>Additionally, beginning in the fourth quarter of 2021, Crown will run an annual Board-sponsored financial crime and compliance awareness initiative where employees will be engaged in a number of ways to increase overall awareness of financial crime and the role Crown plays in detecting, deterring and disrupting financial crime.</li> <li>On 17 June, Financial Crime met with representatives from Learning and Development and Procurement to discuss a consistent approach to ML/TF Risk Awareness Training for contractors across the group. Taking a risk based approach depending on the role and type of contractors, Financial Crime will work with the Learning and Development team to create ML/TF Risk Awareness Training specific to contractors.</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
21.	Employee Due Diligence	<ul style="list-style-type: none"> <li>[Redacted]</li> </ul>	<ul style="list-style-type: none"> <li>[Redacted]</li> </ul>	Steve Blackburn / Nick Stokes	Ongoing refinement.
22.	Sydney specific - Additional Crown Sydney AML controls	<ul style="list-style-type: none"> <li>In addition to the controls described at items 12 - 21 above, Crown has implemented the following additional AML controls at Crown Sydney:                             <ul style="list-style-type: none"> <li>All Crown Sydney members will be subject to a VIP membership onboarding process. Under Crown Sydney's VIP Casino Membership</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Refer to item 37 below.</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>Policy, in order to become a VIP casino member, a person must go through an application process which involves collection of KYC information (if the person is not already a Crown Rewards Member)</p> <p>[REDACTED]</p> <ul style="list-style-type: none"> <li>As noted at item 37 below, over 530 potential Sydney based customers have been subject to a Significant Player Review. Of the player's reviewed, 20 have been issued with a Withdrawal of Licence (WOL) and a further 17 have been flagged for POI Committee review.</li> </ul>			
23.	<b>Independent review of the Joint AML/CTF Program</b>		<ul style="list-style-type: none"> <li>In the fourth quarter of 2021, Crown will engage a third-party consultancy firm to conduct an independent</li> </ul>	Steve Blackburn / Nick Stokes	31 December 2021



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
			<p>review of the Joint AML/CTF Program. Crown will share the results of the review and Crown's response with Regulators. The review will assess:</p> <ul style="list-style-type: none"> <li>• the effectiveness of the Joint AML/CTF Program having regard to the ML/TF risk of each reporting entity in the designated business group;</li> <li>• whether the Joint AML/CTF Program complies with the AML/CTF Rules;</li> <li>• whether the Joint AML/CTF Program has been effectively implemented; and</li> <li>• whether each reporting entity in the designated business group has complied with the Joint</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
			<p>AML/CTF Program.</p> <ul style="list-style-type: none"> <li>Crown will undertake to have a further independent review conducted twelve months after the independent review.</li> </ul>		
24.	<b>Deloitte Forensic Review</b>	<ul style="list-style-type: none"> <li>Deloitte have been engaged by Crown to conduct a forensic review and controls assessment to address the recommendations in the Bergin report. The review commenced on 22 February 2021 and consists of the following three phases of work: <ul style="list-style-type: none"> <li><b>Phase 1</b> assessed the design and operating effectiveness of Crown's current Patron Account Controls.</li> <li><b>Phase 2</b> will confirm whether there are any transactional patterns or behaviours indicative of any money laundering typologies through historic or current Crown patron accounts, including but not limited to the typologies identified in the Grant Thornton and Initialism Reports. This phase will provide the Crown Resorts Board and Regulators with full visibility as to: <ul style="list-style-type: none"> <li>whether there were other transactional patterns or behaviours indicative of</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Crown is closing out remaining recommendations from the Deloitte Phase 1 Report, due by June and October 2021. All recommendations due for implementation by June 2021 have been implemented.</li> </ul>	Steve Blackburn / Nick Stokes	<p>Phase 1 – Substantially complete.</p> <p>Phase 2 – 17 September 2021 (draft report).</p> <p>Phase 3 – initial draft report by 30 July with subsequent report by 17 September 2021.</p> <p>Hotel Card Transaction work – 24 September 2021 (draft report).</p>



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>money laundering through the Riverbank or Southbank accounts not identified in the Grant Thornton and Initialism Reports; and</p> <ul style="list-style-type: none"> <li>the extent to which any other Crown patron accounts (including all historic patron accounts) may also have been infiltrated by criminal elements.</li> </ul> <p>Further, Deloitte will undertake a sample review of other Australian or overseas bank accounts held by Crown or other legal entities associated with Crown's Australian casino operations. If it identifies any accounts that were used, or capable of being used, as patron accounts it will add these to the scope of the Phase 2 review.</p> <ul style="list-style-type: none"> <li><b>Phase 3</b> will provide comfort to the Crown Resorts Board and Regulators as to whether Crown's broader control framework appropriately mitigates the risk of any transactions similar to those identified in Phase 2 continuing to occur through the Crown's current patron accounts.</li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>• Phase 1 was prioritised to ensure the Crown Resorts Board and Regulators are provided with comfort as soon as possible that Crown has appropriately mitigated the risk of transactions occurring through Crown's current patron accounts that are similar to those identified in the Grant Thornton and Initialism Reports in relation to the Riverbank and Southbank accounts dated November 2020.</li> <li>• The final Phase 1 report was provided by Deloitte on 26 March 2021</li> <li>• Crown has implemented the majority of the recommendations provided in the Deloitte Phase 1 report and is progressing on the outstanding recommendations which are due on 30 June, 1 October, 31 December.</li> <li>• On 15 May 2021, Mr Blackburn presented an update to the Crown Resorts Limited Board on steps to address recommendations in Deloitte Forensic Review Phase 1.</li> <li>• On 29 June 2021, Deloitte was engaged to undertake an additional review of transactions relating to the practice involving Crown receiving payment at Crown Towers Hotel (Melbourne) from international VIP customers using a credit or debit card, with</li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		the funds then made available to the patron for gaming at the Crown Melbourne casino. The review will cover the period 1 January 2012 to 30 April 2021. The results of this review will be shared with Regulators.			
25.	<b>Steven Blackburn proposals</b>	<ul style="list-style-type: none"> <li>Mr Blackburn's plan is to continue the process of embedding Crown's new Joint AML/CTF Program, including the roll out of Crown's automated transaction monitoring system, Sentinel. In parallel, Crown will conduct an enterprise-wide ML/TF risk assessment</li> <li>On 24 May 2021, the Crown Resorts Limited Board approved a detailed report and plan that sets out Mr Blackburn's assessment of Crown's current maturity across all elements of financial crime and compliance, and his recommendations in relation to a comprehensive Financial Crime &amp; Compliance Change Program. A copy of this approved plan will be provided to regulators and includes: <ul style="list-style-type: none"> <li>a targeted future state maturity for financial crime;</li> <li>an assessment of capability and capacity required to deliver the targeted future state maturity;</li> <li>an increase in FTE team numbers from 56 existing FTEs in Financial Crime &amp; Compliance to 111 FTE,</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>PwC assisting to prepare a delivery plan for AML/CTF transformation. An internal workshop was held on 20 July 2021 at which plans were refined and delivery leads appointed for each initiative.</li> </ul>	Steve Blackburn	The plan was approved by the CRL Board on 24 May 2021.





#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>with an accompanying increase in budget of \$10m;</li> <li>• the introduction and development of best practice risk assessment and reporting;</li> <li>• an enhanced reporting and oversight regime coupled with a comprehensive approach to assurance and training;</li> <li>• control uplifts to address money laundering and terrorist financing vulnerabilities;</li> <li>• changes to reporting and data capabilities, including through the development of improved data analytics capacity and technology improvements;</li> <li>• the more effective deployment of Crown’s surveillance capabilities to assist the Financial Crime &amp; Compliance team;</li> <li>• a roadmap to guide the delivery of the Financial Crime &amp; Compliance Change Program.</li> <li>• Preliminary work has begun on the enterprise-wide ML/TF risk assessment with the support of PWC.</li> <li>• A copy of Mr Blackburn’s plan has been provided to Crown’s regulators.</li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
<b>Risk management</b>					
26.	<b>Risk team changes</b>	<ul style="list-style-type: none"> <li>In December 2017, a new Group Manager, Risk and Audit role was created, reporting to the CEO of Australian Resorts. Ms Anne Siegers was recruited for that role.</li> <li>In December 2020, the new role of Chief Risk Officer (<b>CRO</b>) was created, reporting directly to the CEO of Crown Resorts (or equivalent) with a reporting line to the Risk Management Committee. Ms Siegers was appointed in this role. The CRO is also a member of the Executive Team for each property.</li> <li>Since her arrival at Crown, Ms Siegers has built up the risk team from one full time equivalent to seven. This includes four risk managers who have been embedded in the business. These risk managers sit with the business and attend operational meetings to facilitate the consideration of risk management as part of decision-making and ensure greater knowledge of the business by the risk department.</li> <li>Three additional roles have been appointed in the risk team (taking the team to ten FTE). Two of these roles have commenced and the third (Group General Manager, Risk) has been appointed and will commence on 23 August 2021.</li> </ul>	<ul style="list-style-type: none"> <li>Complete.</li> </ul>	Anne Siegers	This recruitment process is complete.
27.	<b>Risk management policies and</b>	<ul style="list-style-type: none"> <li>On joining in 2017, Ms Siegers reviewed the existing risk matrix and significantly reduced</li> </ul>	<ul style="list-style-type: none"> <li>Complete</li> </ul>	Anne Siegers	Complete



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
	<p><b>procedures</b></p>	<p>the materiality threshold so that more risk information was provided to the Board. She also introduced escalation requirements for each level of risk to specify when risks were required to be escalated and to whom.</p> <ul style="list-style-type: none"> <li>• A formal risk appetite was approved by the Board in November 2018.</li> <li>• A risk management strategy (which incorporated the risk appetite statement) was approved by the Board in June 2019. The risk management strategy is reviewed annually and was updated in June 2020 to include a section on risk culture.</li> <li>• When Ms Siegers joined Crown, there were existing Corporate Risk Profiles but there were gaps in individual risk profiles below that for each specific business area. The risk department commenced a program of work to prepare these risk profiles for each business area in 2018 and now has risk profiles for the majority of business areas, including VIP Operations. Each risk profile identifies a specific individual who is responsible for risk in that area, including escalation of those risks.</li> <li>• A first draft of the Risk and Compliance Culture Framework was provided to the Risk Management Committee (<b>RMC</b>) in November 2020. Feedback was also received from Deloitte on the Framework.</li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>A revised Risk and Compliance Culture Framework was approved by the Crown Board in March 2021.</li> </ul>			
28.	<b>Risk governance and reporting</b>	<ul style="list-style-type: none"> <li>A number of changes have been made to the RMC process:               <ul style="list-style-type: none"> <li>meetings increased from two per annum to four in November 2017 and then from four to six meetings per annum in late 2019;</li> <li>meeting time has increased to three hours for each meeting;</li> <li>emerging risk, compliance and AML issues have all been added as standing items to the RMC agenda;</li> </ul> </li> <li>Reporting to the RMC has been enhanced and the RMC now receives the following at each meeting:               <ul style="list-style-type: none"> <li>an executive summary of emerging risks around the business;</li> <li>risk appetite dashboards which report against the seven risk categories in the risk appetite statement;</li> <li>proposed adjustments to risk profile based on the key events discussed;</li> <li>an update on material risks;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Complete</li> </ul>	Anne Siegers	Complete



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>a summary of key risk indicators divided into the seven risk categories. This is based on operational data that assists with identifying where there might be emerging risks, for example, the number of data breach events reported the Compliance.</li> <li>The minutes from each RMC are provided to the full Board of Crown Resorts, and the Chair of the RMC provides an update to the Board on key matters considered during the RMC meeting.</li> <li>The ERCC was established in July 2018 in Melbourne (it was already in existence in Perth). ERCC meetings coincide with Risk Management Committee meetings. This ensures that Executives are aware of what is going to the RMC and can ensure that all relevant information for each property is being escalated.</li> <li>Updated reporting format, including reporting in relation to risk and compliance culture was approved by the RMC in March 2021.</li> </ul>			
29.	<b>Additional risk management enhancements</b>	<ul style="list-style-type: none"> <li>An Enterprise Risk Management system was introduced in Melbourne (it was already in use in Perth) to collate risk information and facilitate reporting.</li> <li>Monthly meetings of compliance officers have been rolled out. All business units</li> </ul>	<ul style="list-style-type: none"> <li>Review of training is continuing and is now scheduled for completion in August 2021.</li> </ul>	Anne Siegers	August 2021



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>escalate any issues that have been identified during the month at these meetings. The CRO attends all of these meetings to ensure that the risk department is fully informed of compliance issues and can identify systemic issues if they arise.</p> <ul style="list-style-type: none"> <li>The Risk team has commenced a review of the training programs provided to staff to consider whether there is adequate coverage of relevant risks in the training program.</li> </ul>			
30.	<b>Deloitte review</b>	<ul style="list-style-type: none"> <li>Deloitte was retained to review the risk management program in February 2019.</li> <li>Deloitte's report was provided in June 2019 and each of the recommendations provided by Deloitte have now been implemented, with the exception of one recommendation that proposed a change in name of one of Crown's risk policy documents.</li> </ul>	<ul style="list-style-type: none"> <li>Complete.</li> </ul>	Anne Siegers	Complete
<b>Culture</b>					
31.	<b>Crown values</b>	<ul style="list-style-type: none"> <li>For performance year FY20, Crown rolled out its new values, which are: <ul style="list-style-type: none"> <li>We do the right thing.</li> <li>We act respectfully;</li> <li>We are passionate; and</li> <li>We work together.</li> </ul> </li> <li>The values were introduced in Melbourne and Perth at briefings provided to all staff to formally launch the values.</li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>After the formal launch, the values were promoted with extensive signage in back of house areas which included explanations and interviews with employees about what each of the values mean to them.</li> <li>The values have also been incorporated into other relevant policies and documents like the Crown Code of Conduct and the Risk and Compliance Culture Framework.</li> </ul>			
32.	<b>Culture Reform Program</b>	<ul style="list-style-type: none"> <li>An overarching culture reform plan to assess current culture and to address any necessary cultural reform has been developed, broken into the following key areas: <ul style="list-style-type: none"> <li>Laying the foundations and tone from the top</li> <li>Assessing Crown's current culture</li> <li>Reviewing and refining Crown's strategic intent</li> <li>Clarifying Crown's Purpose and Values</li> <li>Engaging key stakeholders, including Crown's regulators in relation to Purpose and Values</li> <li>Assessing the gaps and planning remediation</li> <li>Plan to embed the evolution of the Purpose &amp; Values</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The Culture Reform Program is under the direction of the Chief Executive Officer (commenced 1 June 2020) and the Chief People and Culture Officer (commenced 7 June 2021).</li> <li>The tone from the top of the organisation has changed materially with a refreshed Board and management team.</li> <li>Phase 2 of Deloitte's work (see #33) will enable us to understand our current culture. With this information and refreshed leadership Crown will review its purpose and values and determine what</li> </ul>	Tony Weston	To be determined by 16 August 2021 (at the conclusion of phase 4 of Deloitte's work (see below))



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>Implementing a governance structure</li> <li>Developing and implementing a measurement process</li> <li>Audit and information sharing</li> <li>The plan was presented to and endorsed by the Board in December 2020.</li> </ul>	work is required to deliver a reformed culture.		
33.	<b>Deloitte culture review</b>	<ul style="list-style-type: none"> <li>Deloitte has been engaged to conduct an organisational culture review, broken into four discrete phases of work. Deloitte has been engaged to undertake all four phases of work, with the engagement to undertake the fourth phase finalised on 23 June 2021</li> <li>Phase 1 was completed in February 2021 and involved the development of a framework to assess Crown's existing culture and its maturity.</li> <li>Phase 2 of this work is complete. This phase involved Deloitte carrying out a detailed analysis to gain a deeper understanding of Crown's culture and identify levers for change, including through the use of surveys, focus groups and interviews with a large number of Crown employees (approximately 50 individual interviews, 40 focus groups with 415 attendees and 7,5000 survey responses).</li> <li>Phase 3 is complete and involved Deloitte using both quantitative and qualitative analysis to prepare a detailed report of their</li> </ul>	<ul style="list-style-type: none"> <li>Phase 4 has commenced and involves using the insights from phases 1-3 to define a target culture state for Crown and build a road map to achieve cultural change. The implementation of this road map will take further time to achieve but will give Crown a clear path forward to achieve effective and long-lasting cultural change.</li> <li>Crown will bring together its key leaders from across the business in workshops as an integral part of its broader change program. These workshops commenced in July and will continue in August with an initial focus on restating Crown's purpose and values.</li> </ul>	Tony Weston	<p>The expected completion dates for this work is:</p> <ul style="list-style-type: none"> <li>Phase 2: 16 July 2021 (complete)</li> <li>Phase 3: 23 July 2021 (complete – draft report provided)</li> <li>Leadership forums: planned to continue</li> <li>Phase 4: 16 August 2021</li> </ul>





#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>findings and insights for presentation to senior management and the Board.</p> <ul style="list-style-type: none"> <li>Crown gathered its 70 key leaders from across the business on 15 July 2021 as an integral part of phase 4 of this culture reform project. This day involved reviewing the relevance and applicability of our Purpose and Values and commenced the development of our Culture Reform Roadmap.</li> </ul>			
34.	<b>Remuneration</b>	<ul style="list-style-type: none"> <li>A potentially new LTI program and revised STI structures implemented for each member of Crown's key management personnel (<b>KMP</b>) eligible to receive an STI including partial deferral and forfeiture in the event of any adverse compliance or regulatory events. A deferral and forfeiture mechanism will apply to the new CEO once a candidate is identified.</li> <li>Introduction of mandatory Compliance and Risk KPOs for all salaried staff in FY20.</li> <li>Introduction of values based 'hurdles' as part of performance management framework in FY20.</li> <li>Crown has engaged Mercer to review and provide recommendations in relation to Crown's remuneration framework. In parallel, the University of Queensland is assisting Crown to review and modernise its performance management framework. Both streams of work are ongoing.</li> </ul>	<ul style="list-style-type: none"> <li>The development of new LTI and revised STI structures for KMPs will be delivered by the Chief People &amp; Culture Officer in the second half of 2021. The work to introduce values-based hurdles and mandatory compliance and risk KPOs will also be led by the Chief People and Culture Officer.</li> </ul>	Tony Weston	<p>End of calendar 2021 for work to design and implement a new LTI program and update STI structures. Design and implementation of a revised approach to performance management, including the KPO planning process will be completed by 31 October 2021.</p> <p>The roadmap for cultural change referred to above (phase 4 of Deloitte's work) will identify a timetable and workplan for this project.</p>



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
<b>Junkets/POI/Significant player review</b>					
35.	<b>Cessation of dealing with junket operators</b>	<ul style="list-style-type: none"> <li>On 17 November 2020, the Crown Board determined that Crown will permanently cease dealing with all junket operators, subject to consultation with gaming regulators in Victoria, Western Australia and New South Wales. Crown informed all recently active junket operators of this decision by early December 2020.</li> <li>On 23 November 2020, Crown Perth submitted an update to the casino manual removing junket programs and thereby discontinuing dealings with junket operators.</li> <li>On 23 February 2021, the Gaming &amp; Wagering Commission directed Crown Perth to discontinue International Program Play and junkets.</li> <li>On 18 May 2021, each of Crown Resorts Limited and Crown Melbourne Limited confirmed to the Victorian Royal Commission that it: <ul style="list-style-type: none"> <li>has ceased dealings with international junket operators;</li> <li>has ceased dealings with junket tour operators;</li> <li>does not intend to deal with international junket operators in the future (whether by staff based in Australia or otherwise); and</li> </ul> </li> </ul>	Complete	Xavier Walsh	Complete



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>does not intend to deal with junket tour operators in the future.</li> </ul>			
36.	POI review	<ul style="list-style-type: none"> <li>In April 2020, Crown commissioned Deloitte to undertake a review of its junket due diligence and POI process. The final report was received from Deloitte in August 2020.</li> <li>The Crown Resorts Board resolved to adopt the recommendations on 18 August 2020.</li> <li>A workplan to implement the Deloitte recommendations was endorsed by the Board on 10 September 2020.</li> <li>Recommendations in relation to customer due diligence have been implemented, including expansion of the POI Committee to a group-wide committee, implementation of a POI Decision Assessment tool, and providing the Crown Melbourne Compliance Committee and the Crown Resorts Board Risk Management Committee with oversight of POI process.</li> </ul>	<ul style="list-style-type: none"> <li>The Financial Crime team is currently reviewing SPR Framework and the Group POI Committee process, looking for improvement opportunities.</li> </ul>	Michelle Fielding / Anne Siegers	Complete with ongoing refinement.
37.	Significant Player Review	<ul style="list-style-type: none"> <li>A new process was implemented in 2020 (and subsequently further refined) to assist with customer due diligence and identification of individuals with whom Crown should cease dealing.</li> <li>A Significant Player Review Policy (<b>SPR Policy</b>) to support the process is in development.</li> <li>[REDACTED]</li> </ul>	<ul style="list-style-type: none"> <li>Reviews will be undertaken on an ongoing basis as new customers reach certain trigger thresholds and as periodic re-assessments are undertaken.</li> <li>Crown's Group Chief Compliance and Financial Crime Officer, is currently</li> </ul>	Tim Barnett	Complete with ongoing refinement.



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<div data-bbox="593 327 1120 853" style="background-color: black; width: 100%; height: 100%;"></div> <ul style="list-style-type: none"> <li data-bbox="638 861 1075 1220">• Reviews completed for in excess of 1400 top customers in Melbourne and in excess of 530 Sydney based customers who are expected to become Crown Sydney customers. Approximately 260 customers have been issued with Withdrawal of Licence, either by operation of the POI Committee or subsequently for failure to provide sufficient source of wealth information.</li> <li data-bbox="638 1228 1075 1316">• Reviews are also underway on approximately 470 former VIP International customers who have</li> </ul>	<p>reviewing SPR Framework and the Group POI Committee process, looking for improvement opportunities.</p>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>been identified as likely to visit upon the reopening of international borders as Premium players. To date 74 have been issued a Withdrawal of Licence primarily due to being former junket operators, representatives or guarantors.</p> <ul style="list-style-type: none"> <li>• Perth's review of its top customers continues with 454 customers currently subject to reviews. All have been assessed on a preliminary basis with 37 of these having an elevated level of risk. Fifteen of these customers have been issued with a Notice revoking Licence.</li> <li>• As part of the top locals (Melbourne) review above, a new workstream has identified approximately 70 former international customers now predominantly domiciled in Melbourne. Thus far, 48 patrons have been approved to continue as customers, 17 reviews are ongoing, and 7 have been issued with a Withdrawal of Licence. A similar review has occurred for former international customers (8) now domiciled in Perth. One of the eight customers identified through</li> </ul>			



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<p>this process has been issued a Notice Revoking Licence.</p> <ul style="list-style-type: none"> <li>Crown has also reviewed 111 patrons whose accounts were identified in the November 2020 Grant Thornton/Initialism reports as being associated with transactions indicative of structuring or cuckoo smurfing. To date 18 have been issued a Withdrawal of Licence, of which 11 were as a result of being former junket operators, representatives or guarantors, and a further 7 for behavioural, responsible gambling or unsubstantiated source of wealth reasons.</li> </ul>			
38.	Credit approval process	<ul style="list-style-type: none"> <li>[REDACTED]</li> </ul>	<ul style="list-style-type: none"> <li>Complete.</li> </ul>	Anne Siegers	Complete
39.	[REDACTED]	<ul style="list-style-type: none"> <li>[REDACTED]</li> <li>[REDACTED]</li> </ul>	[REDACTED]	Steve Blackburn	Calendar 2021



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>[Redacted]</li> <li>[Redacted]</li> <li>[Redacted]</li> <li>[Redacted]</li> </ul>	[Redacted]		
<b>Audit and assurance</b>					
40.	<b>Audit enhancement</b>	<ul style="list-style-type: none"> <li>Quality Assessment of the Internal Audit Department was obtained from the Institute of Internal Auditors Australia in October 2020. The review concluded that the Crown Internal Audit Department is operating professionally and generally conforms with the Internal Audit Standards. This is the highest rating that can be achieved.</li> <li>The risk and audit functions have been separated as part of the recent organisational restructure as an enhancement to the Three Lines of Defence model.</li> </ul>	<ul style="list-style-type: none"> <li>Following her appointment in May 2021, Ms Otner has been undertaking a review of Crown's internal audit function with a view to making recommendations to the Crown Resorts Audit &amp; Corporate Governance Committee.</li> </ul>	Jessica Otner	August 2021 for recommendations to the Crown Resorts Audit & Corporate Governance Committee.



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>A new Group General Manager – Internal Audit was appointed and commenced on 10 May 2021.</li> <li>A new independent auditor was appointed from the commencement of the 2021 financial year.</li> </ul>			
<b>Responsible Gaming</b>					
41.	<b>Independent Responsible Gaming Advisory Panel Recommendations</b>	<ul style="list-style-type: none"> <li>In August 2020 the Independent Responsible Gaming Advisory Panel made 17 recommendations in relation to Crown's responsible gaming programs. A detailed description of each recommendation, the status of its implementation and the timeframe for completion has been provided to VCGLR in July 2021 and will be provided to each applicable Regulator.</li> </ul>	Progress on the recommendations are available in the detailed document	Steven Blackburn / Sonja Bauer	Timeframes are recorded in the more detailed document on this stream of work.
42.	<b>Responsible Gaming enhancements</b>	<ul style="list-style-type: none"> <li>On 24 May 2021, the Board resolved to adopt a number of responsible gaming enhancements, namely: <ul style="list-style-type: none"> <li>Reduced time limits on player for domestic players and international premium program players</li> <li>Support for a state-wide exclusion register</li> <li>Cessation of bingo program</li> <li>Cessation of red-carpet program</li> </ul> </li> </ul>	<p>Progress on the enhancements approved by the Board on 24 May are described below:</p> <ul style="list-style-type: none"> <li>Reduced time limits will be implemented by October 2021, allowing for technological, operational, training and customer communications to be developed and settled</li> <li>Support for State Wide Exclusion register – This</li> </ul>	Steven Blackburn / Sonja Bauer	See 'Proposed next steps' column for target timing





#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
		<ul style="list-style-type: none"> <li>Increased diversity of RG staff</li> <li>Support for move to cashless gaming</li> <li>Controls on direct-to-member offers</li> <li>Cessation of gaming vouchers to subscribe to loyalty programs</li> <li>Research into association between loyalty program and gambling harm</li> <li>Employee incentive plans to consider RG implications</li> </ul>	<p>includes a stepped approach whereby Australian and potentially Australasian Casinos consider an Industry wide Self Exclusion Program; followed by approaches to State Regulatory Bodies and other stakeholder approaches with a view to implementing across land based gaming machines venues where these exist in the States Crown Resorts operates. A meeting was held on 22 July 2021 with the Australasian Responsible Gaming Casino Forum members, which ratified that a working group consisting of the Australasian Gaming Council, The Star and Crown Resorts would progress the initial concept of a framework, with initial consultation to Australasian Casinos for consideration commencing in late August 2021.</p> <ul style="list-style-type: none"> <li>Cessation of Bingo and 'Red Carpet (Bus)</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
			<p>programs has been implemented at Crown Perth and Crown Melbourne and will not operate at Crown Sydney. These initiatives are complete.</p> <ul style="list-style-type: none"> <li data-bbox="1093 552 1451 1086">• The current recruitment of Responsible Gaming Advisors has commenced for staff from CALD backgrounds including language skills that are potentially underrepresented in the staff profile but potentially overrepresented in likely problem gambling profiles at property level. The recruitment process in Melbourne, Perth and Sydney is in the interview stage with the targeting of appointments by September 2021.</li> <li data-bbox="1093 1102 1451 1214">• Responsible Gaming is represented at the Crown Steering Committee for cashless/digital wallets.</li> <li data-bbox="1093 1230 1451 1316">• Direct-to-member offers have been reviewed and controls developed to</li> </ul>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
			<p>prevent offers requiring customers to exceed historical behaviours (spend/visits) to receive their first benefit. Internal process for gaming promotions subject to review (due to be completed in September 2021). Gaming voucher issuance for new Loyalty Program members have ceased (completed).</p> <ul style="list-style-type: none"> <li>The framework for implementation of research into potential associations between loyalty program and gambling harm has been established, with the first iteration due for completion by November 2021.</li> <li>Gaming Sales 'Sales Incentive Plans' have ceased and RG implications will be considered in new plans.</li> </ul> <p>Additionally, the RG department continues to work on the RGAP Recommendations (details on this progress have been provided to the VCGLR and will be provided to</p>		



#	Area	Changes already made	Proposed next steps	Responsibility	Target Timing
			other applicable Regulators); is scoping technological solutions to assist with recording of RG customer contacts for gaming staff and a case management system for RG contacts; and is developing an Employee Reward & Recognition Scheme for rewarding employees displaying responsible gaming service excellence.		
43.	<b>Responsible Gaming – matters arising from the Victorian Royal Commission</b>		<p>At its 15 June 2021 meeting the Board resolved to engage the Independent Responsible Gaming Advisory Panel to provide advice into aspects of Crown's responsible gaming programs that have been the subject of criticism by the Victorian Royal Commission.</p> <p>Based on the advice we receive from the Independent Panel it is Crown's intention to develop a plan to address the matters raised by the Royal Commission.</p>	Steven Blackburn / Sonja Bauer	To be determined.