

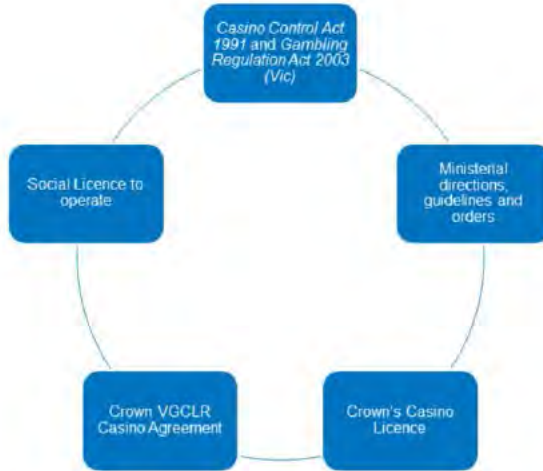
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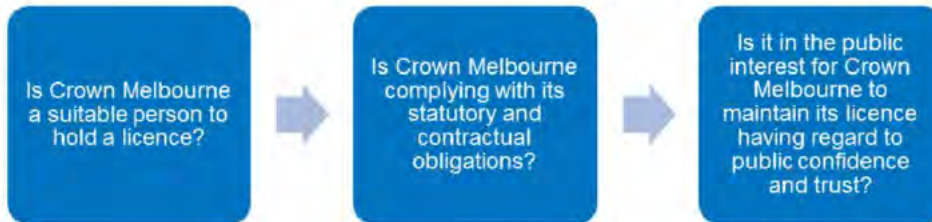
Responsible Gaming Obligations



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Regulatory Oversight



Recognising Problem Gambling

- Crown's definition of **problem gambling** is adopted from the Gambler's Help website:
 - *Harm from gambling isn't just about losing money. Gambling can affect self esteem, relationships, physical and mental health, work performance and social life. It can harm not only the person who gambles, but also family, friends, work places and communities.*

- Crown employs the following non-exhaustive list of **observable signs** of problem gambling:
 - Self-disclosure of a problem with gaming or request to self exclude
 - Requests for assistance from family and/or friends concerned about an individual's gaming behaviour
 - Children left unattended whilst parent/guardian gambles
 - Gets angry while gaming or shows signs of distress during or after gaming
 - Often gambles for long periods without a break
 - Witnessed or heard that a customer was trying to borrow money for gaming
 - Significant decline in personal grooming or appearance
 - Observed conflict over gaming between family members or friends
 - Unrealistic remarks about gaming
 - Complaints to staff about losing or blames the casino or gaming product for losing
 - Secretive or embarrassed about being at the casino or stays on to gamble when friends leave the venue
 - Gambles without reacting to what is going on around him/her and avoids contact or conversations with others
 - Frequent visits to the ATM

Governance and operating model

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Responsible Gaming Governance

Structure



Awareness
Supporting harm minimisation by building awareness of responsible gaming programs and services for staff and customers

Assistance
Contributing to harm minimisation by providing assistance to customers in managing their gaming behaviours

Support
Delivering a supportive environment where the potential for harm is minimised and a culture of responsible gaming is embedded in the organisation

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Responsible Gaming Centre



- World first centre of its kind launched in 2002
- On-site support service for Crown customers who may be experiencing problems with their gambling behaviours, as well as their family and friends
- The RGC is responsible for delivering and facilitating the following programs and services:
 - Self-Exclusion, Third-Party Exclusion, Time-Out, Self-Exclusion Revocation and Gambling Resumption Information Programs
 - YourPlay and Play Safe Limits (voluntary pre-commitment)
 - Player Activity Statements, Data Analytics (the Crown Model) & CCTV (Neoface)
 - Counselling with Responsible Gaming Psychologists/Chaplain
 - Referral services
 - Maintain the Responsible Gaming Register
 - Responsible Service of Gaming Training

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Code of Conduct

- The Responsible Gambling Code of Conduct (**Code**) outlines Crown's approach to responsible gaming.
- The Code covers the following key items:
 - Crown's commitment to Responsible Gambling
 - Responsible Gambling information
 - Gambling product information
 - Customer loyalty program information
 - Pre-commitment
 - Interaction with customers
 - Interaction with staff
 - Problem Gambling Support Services including:
 - Chaplain and psychologists
 - Customer Complaints
 - Financial Transactions
 - Responsible Advertising and Promotions

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Employee training

- **All Employees:**
 - Induction: RSG induction and RSG Online
 - Every 2 years: RSG Online

- **Gaming Machine Business Unit Employees:**
 - Induction: RSG Additional Focus Training
 - Every 2 years: RSG Additional Focus Training

- **Senior Managers:**
 - Every 2 years: RSG Senior (Advanced) Manager Training Program

- **Gaming Machines, Security Services, Table Games and VIP Services staff:**
 - Quarterly briefings or "musters" with RGAs.

- **Table Games Dealers:**
 - Induction: SIT30616 Certificate III in Hospitality (Table Games).

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Gaming monitoring tools

Play Periods

A program that monitors customer play in real time and identifies continuous ratings without appropriate breaks over a 24 hour period.

Crown Model

A predictive data modelling tool designed to assist in proactively identifying customers at risk of harm from gambling in the general loyalty program member population.

Facial recognition

CTV monitoring and facial recognition technology used to monitor for observable signs, track their location in the complex and to review incidents that may occur.

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Customer support tools

• **Player Activity Statements (PAS)**

- PASs provide information on a loyalty program member's EGM and Fully Automated Table Games (FATG) play, including time played and all wins and losses for the period of the statement

• **Pre-commitment programs**

- YourPlay - State government administered voluntary EGM time and spend limit setting scheme.
- Play Safe – Crown operated voluntary FATG time and spend limit setting scheme for loyalty program members.

• **Time Out Program**

- A customer can elect to ban themselves from the casino gaming floor for a three or six month period.

Responsible gaming exclusion processes



Responsible gaming interactions data

Nature of Service	2018	2019	2020
Welfare/Observable Signs	959	1221	354
Responsible Gaming Withdrawal of Licence	N/A	123	185
Self Exclusion	401	775	322
Self Exclusion Information	310	351	90
Time Out	37	63	19
Voluntarily Identified	1012	1724	670
Identified by Crown	1046	1444	545
Identified by 3rd Party	67	198	25

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Revocation of exclusion processes

- A self-exclusion can be revoked if all conditions are satisfied, including:
 - Minimum period of self-exclusion has passed
 - Breach-free for 12 months
 - Letter of support from a counsellor
- The application is then considered by the Self Exclusion Revocation Committee

SE Revocations	
2016	69
2017	54
2018	53
2019	64
2020	29
2021 to 31 Mar	49

Responsible Gaming and Marketing

- Crown is required to:
 - 'advertise and promote the Melbourne Casino Complex so as to endeavour to ensure that the Melbourne Casino Complex is fully and regularly patronised'; and
 - provide information to promote informed choice to gamble responsibly.
- Crown is required to provide brochures and signage about responsible gaming services and the risks of problem gambling.
- Crown uses best endeavours (stop codes) to exclude affected patrons from advertising/marketing.

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Identified breaches of Responsible Gaming laws

In its response to RFI-002, Crown identified a small number of breaches or potential breaches of its RG obligations, including:

- short periods where certain EGMs were operating in unrestricted mode and/or continuous play mode outside of regulatory requirements (Nov 2015, Sep 2018, Nov 2018)
- short periods government information relating to responsible gaming was not available as required on EGMs (Mar 2018)
- alleged instances of intoxicated patrons being allowed to place bets (Mar 2019)

Each of these breaches were addressed with the VCGLR and resolved.

Public submissions themes and responses

Key theme	Issues	Crown Response (*** for Board approval)
Identification of problem gambling	<ul style="list-style-type: none"> Effectiveness of observation (submissions give examples of problem gamblers who were not identified by Crown) Time in play (submissions claim that minimum play period before an RG interaction – 12 hours – is too long) 	<ul style="list-style-type: none"> Increased RGAs* Shorter time limits on play* Increased diversity of RG staff* Technology enhancements*
Self-exclusion	<ul style="list-style-type: none"> Accessibility of self-exclusion (submissions claim that self-exclusion process is intimidating, especially for patrons from culturally or linguistically diverse communities) Effectiveness of exclusions (some patrons claim they were able to gamble after self-excluding) 	<ul style="list-style-type: none"> Increased RGAs* Increased diversity of RG staff* Support for State-wide exclusion register*
Enticements	<ul style="list-style-type: none"> Benefits (submission claims that Bingo, entertainment, reward schemes and free food and drink encourage some patrons to gamble beyond their means) Design of EGMs (submission claims they are deliberately addictive) 	<ul style="list-style-type: none"> Cessation of Bingo* Cessation of Red Carpet Program* Cessation of "stretch targets"* Cessation of gaming vouchers on Crown rewards sign up* Loyalty Program research*
Illegal activity	<ul style="list-style-type: none"> Loan sharking (submission claims Crown turns a blind eye to on-site illegal activities, such as loan sharking) 	<ul style="list-style-type: none"> Increased RGAs*

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Public submissions themes/ responses

Key theme	Issues	Crown Response (*** for Board approval)
Service of Alcohol	<ul style="list-style-type: none"> Excessive service of alcohol (submissions give examples of alcohol impairing gambling decision-making, sometimes with Crown knowledge) 	<ul style="list-style-type: none"> Increased RGC resources* Lower time limits on play*
Gambling Environment	<ul style="list-style-type: none"> Lack of clocks and natural light (submission claims that this contributes to patrons losing track of time and exacerbating problem gambling) 	
Gambling addiction information	<ul style="list-style-type: none"> Insufficient information about gambling addict services (on submissions claims no signage and no warnings around gaming machines) 	

Advisory Panel Recommendations: August 2020

- Expansion of Responsible Gaming Centre
- Develop online system for initiating self-exclusion
- External support and treatment services for all applicants for self-exclusion
- Post-revocation monitoring to identify possible risk-indicators and intervention to prevent relapse
- Contractual relationship with treatment agency
- Development of uniform evaluation protocol for revocation across all properties
- Restrictions on access to VIP room/ marketing for 6 months after revocation and subject to counsellor clearance
- Statistical, longitudinal evaluation of facial recognition software effectiveness
- Disseminate knowledge of facial recognition tool to public
- Visible RG "ambassador" in each area on each shift
- Increase and diversify training – booster training every 6 months, retraining every 1-2 years, advanced training for managers
- Personnel raise awareness of brochures and other information essential for informed choice
- Brochure information should be available on website
- Devise educational program clarifying time/money relationship with risk factors
- Better identify marked changes (increases) in play patterns and create model for identifying at-risk gamblers