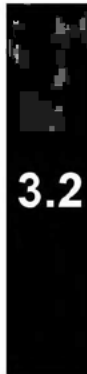




CROWN RESORTS LIMITED
Meeting of the Board of Directors
Monday, 2 November 2020 at 12.00pm
by videoconference

Annexure
Key additions of the Revised Program

Description of Key Controls	The Revised Program sets out more clearly the AML/CTF systems and controls that Crown has in place (see for example, sections 4 (employee due diligence), 6 (transaction monitoring), 8 (enhanced customer due diligence), and 10 (suspicious matter reporting).
Adoption of Three Lines of Defence Model	Implementation of the Crown Resorts Risk Management Strategy's three-lines of defence model by clearly identifying AML/CTF roles and responsibilities across each line of defence.
AUSTRAC Reporting	The Revised Program introduces a new concept of an Unusual Activity Report (UAR). It is proposed that where appropriate, the UAR is completed by a frontline team member (usually a manager) and sent to the AML team for investigation. If the AML team subsequently determines that reasonable grounds for suspicions are established, a Suspicious Matter Report (SMR) can then be prepared and sent to AUSTRAC by the AML team. The UAR process will enhance the quality of SMR's submitted to AUSTRAC.



3.2

Training	The Revised Program requires the tailoring of programs to be more fit for purpose, including the following scenarios: <ul style="list-style-type: none"> • Induction; • Online Risk Awareness; • Business Unit specific; • Refresher; and • Remedial.
Further Know Your Customer ("KYC") and Enhanced Customer Due Diligence	The Revised Program includes a revised method for determining customer risk and makes provision for electronic verification and "eKYC" (see for example, Part B).