

STATEMENT OF NEIL GEORGE JEANS – RFS – Initialism - 001

ANNEX J



Ms Mary Manos
General Counsel & Company Secretary
Crown Resorts Limited
8 Whiteman Street
Melbourne
VIC 3006

30th October 2020

Dear Ms Manos

PART A AML/CTF PROGRAM – Crown Designated Business Group

Section 81 of the AML/CTF Act requires that a Reporting Entity must develop and maintain a written AML/CTF Program that sets out its obligations under the AML/CTF Act and Rules, and sets out how the reporting entity addresses these obligations.

The purpose of the AML/CTF Program is to identify, manage and mitigate the ML/TF risks a Reporting Entity faces through the provision of services designated under the AML/CTF Act. The AML/CTF Rules require a Reporting Entity to have appropriate systems and controls in place to comply with the requirements of the AML/CTF Rules, which in some cases can be risk-based.

Crown Melbourne Limited and Burswood Nominees Limited (Crown Perth) are Reporting Entities under the AML/CTF Act and are subject to the AML/CTF Rules. In order to support compliance with the AML/CTF Act and Rules, the Reporting Entities have formed the Crown Designated Business Group (Crown DBG). Crown Sydney Gaming Pty Ltd will also become a Reporting Entity.

We have reviewed the designated services listed in the Part A AML/CTF Program, and we are of the opinion that they are aligned to the business operations undertaken by the entities that form the Crown DBG.

The AML/CTF Rules place specific responsibilities on Crown's Board and Senior Management to approve Part A of the AML/CTF Program. In considering whether to approve Part A of the AML/CTF Program, the Board and Senior Management should consider whether it is:

- Compliant with Crown's AML/CTF obligations; and
- Appropriate to identify, manage, and mitigate the ML/TF risks reasonably faced.

We have worked with Crown and its legal representatives to develop a Part A AML/CTF Program and the supporting Policy and Procedures and, based on our work, we are of the opinion that the revised documented Part A AML/CTF Program as drafted complies with the relevant AML/CTF Rules, and is appropriately designed to identify, manage and mitigate the money laundering and terrorist financing risks faced by the Reporting Entities that are part of the Crown DBG.

We invite the Board and Senior Management to consider our opinion when deciding whether to approve Part A of the AML/CTF Program for the Crown DBG, as required by Part 9.4 of the AML/CTF Rules.

Yours Sincerely



Neil Jeans
Principal - Initialism Pty Ltd