



Victorian Commission for
Gambling and Liquor Regulation

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file

2 February 2018

Michelle Fielding
Group General Manager – Regulatory and Compliance
Crown Melbourne Limited
8 Whiteman Street
SOUTHBANK VIC 3006

Dear Ms Fielding

The Victorian Commission for Gambling and Liquor Regulation (VCGLR) is responsible for the supervision of operations at Crown Casino (Crown) for the purposes of ascertaining whether or not the casino operator is complying with provisions of the Casino Control Act 1991 ('the Act'), the conditions of the casino licence, and any directions issued by the Commission under this Act.

The VCGLR is currently investigating the circumstances regarding the arrest and convictions on 26 June 2017 of Crown employees in the Shanghai Baoshan District Court, Peoples Republic of China. The employees were convicted of contraventions of Article 303, Clause 1 and Article 25, Clause 1 of the Criminal Law of the Peoples Republic of China.

In accordance with powers appointed under Part 4 of the *Victorian Commission for Gambling and Liquor Regulation Act 2011* and pursuant to *section 26(1) of the Act*

I require Crown Melbourne Limited to produce the following records (the records):-

- The corporate structure for Crown Resort Pte Ltd (Hong Kong) including directors, shareholders, incorporation and company secretary.
- Any documents received, or prepared by, Crown Resort Pte Ltd (Hong Kong) or its staff pertaining to risk assessment of operating in mainland China.
- The Crown Melbourne Limited F16-F18 Internal Audit Plan details that the risk of (19) *Foreign Political Policy*, is rated as significant with the internal audit approach material risk exposure notes (2) *'No Internal Audit Work proposed. Compliance and / or risk exposure is managed using other strategies.'*

Please provide any documents (including minutes and agendas) pertinent to the assessment of this risk (in relation to Crowns operation in mainland China), the assessment that they would be treated with other strategies and also the documented strategies to manage the risk.

- The Crown Melbourne Limited F17-F19 Internal Audit Plan details that the risk of (19) *Foreign Political Policy*, is rated as significant with the internal audit approach material risk exposure notes (2) *'No Internal Audit Work proposed. Compliance and / or risk exposure is managed using other strategies.'*

Please provide any documents (including minutes and agendas) pertinent to the assessment of this risk (in relation to Crowns operation in mainland China), the assessment that it would be treated with other strategies and also the documented strategies to manage the risk.

- Documents provided by Mintz Group to Crown Melbourne Limited and/or Crown Resorts Limited and/or Crown Resort Pte Ltd (Hong Kong) in relation to Project Wager, Project Wager II, Project Wager III, and project Wager IV
- Michael CHEN's employment details/position description, employment contracts and performance reviews / performance development plans.
- Any documents or materials received by Crown Melbourne Limited and/or Crown Resorts Limited and/or Crown Resort Pte Ltd (Hong Kong) and/or their employees from the Peoples republic of China regarding Crowns activities on mainland China.
- Any other records which contain information regarding any identification, assessment or treatment of risks conducted by Crown Melbourne Limited and/or Crown Resorts Limited and/or Crown Resort Pte Ltd (Hong Kong) regarding operations within mainland China from 1 January 2015 to the present, excepting any records or documents which have already been provided to the Commission.

I require you to produce the records by 16 February 2018.

If there is anything that you would like to discuss in relation to this matter, please do not hesitate to contact Tim Bryant on [REDACTED] or [REDACTED]

Yours sincerely



Stephen Berriman
Director, Compliance