

To: Jason Cremona [REDACTED]; Steve Thurston [REDACTED]
From: Rowan Harris [/o=VCGLR/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5c51ae9757da4279b9540abd945a2353-Rowan Harris]
Sent: Fri 6/28/2019 11:58:20 AM (UTC+10:00)
Subject: Call from AUSTRAC and letter to Crown re s25 Review (Recommendation 17)
[Letter to Crown Melbourne re s25 Review - AUSTRAC - 9688825.pdf](#)

Hi Jason & Steve

[REDACTED] called to provide an update on its input to 6CR recommendation 17. AUSTRAC is providing a letter to Crown (Josh) this afternoon ahead of the 1 July deadline. Please refer to email below.

Key points of conversation:

1. Crown only commenced engagement with AUSTRAC on 30 May (ie. date it provided ICSs for review). A meeting was held with AUSTRAC on 14 June. Crown has had 12 months to work on Rec.17.
2. Crown has proposed amendments to ICSs (which ones, do they include Junkets? Will have to wait for its submission) and sought AUSTRAC's input. However, because of legal constraints AUSTRAC is of the view that it is not appropriate to comment on the ICSs. Can't say whether they are 'good or bad' from an AML point of view. They are not part of the AML framework.
3. AUSTRAC found the ICSs minimalistic.
4. Crown's focus re rec.17 (as we are aware) is on implementation of joint AML program which goes before the board for approval in August 2019.
5. Crown engaged Neil Jeans AML consultant in regards to Rec. 17.

I suggest we have a 'close out' meeting with AUSTRAC.

Thanks

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From: [REDACTED]
Sent: Friday, 28 June 2019 11:30 AM
To: Rowan Harris [REDACTED]
Cc: [REDACTED]
Subject: Letter to Crown re s25 Review [SEC=OFFICIAL]

OFFICIAL

Hi Rowan,

Thanks again for your time earlier.

As discussed, attached is the correspondence that we will be sending to Crown later today regarding their request for AUSTRAC input as part of rec 17 of the s25 review. We will be sending this correspondence to Crown later this afternoon.

Following internal consideration, we have made the decision that it is not appropriate for AUSTRAC to comment on the ICSs. The reason for this decision is that AUSTRAC's remit is AML/CTF legislation and compliance with that framework, and we do not believe it is appropriate for us to provide guidance on compliance with another legislative regime or compliance with those obligations.

In terms of the general question around Crown’s compliance with the AML/CTF legislation, we would be happy to discuss with you at a later stage. However, as flagged during our call we have not conducted an assessment this year, predominantly based on Crown’s advice that they will be adopting a new joint AML/CTF Program to cover both their Perth and Melbourne businesses later this year. Our intention is to test their AML/CTF compliance after the adoption of that program. We are happy to keep you apprised of timing for the assessment on Crown.

If you have any further questions, please don’t hesitate to give me a call on either of the numbers below.

Kind regards

Jack

Jack Haldane | A/g Director
Regulatory Operations

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