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26 May 2021

Mr Craig Phillips
 Ms Abigail Gill
 The Solicitors Assisting the Royal Commission
 Into the Casino Operator and Licence
 Level 25, 567 Collins Street
 Melbourne VIC 3000

By Email

Dear Mr Phillips and Ms Gill

Royal Commission into the suitability of Crown Melbourne Limited to hold a Casino Licence (Commission)

We are instructed to inform the Commission that, in accordance with the commitment of Crown Resorts Limited and its domestic subsidiaries (collectively, **Crown**) to the promotion of responsible gaming and to the minimisation of problem gaming behaviours among its customers, on 24 May 2021 the Board of Directors of Crown Resorts Limited endorsed a plan to, among other things, increase operational, clinical, management and support staff for the Responsible Gaming (**RG**) function across Crown's casinos.

More specifically, the plan includes the addition of 14.25 Full Time Equivalent (**FTE**) roles to Crown's RG function, bringing Crown's total FTE in the RG function to 52.8. This 37% increase in FTE is intended to achieve greater visibility of, and engagement by, operational staff on the casino gaming floor and to provide further support to Crown's ongoing collection and evaluation of relevant data that should materially uplift Crown's contribution to the promotion of responsible gaming across Australia. Supported by a new Data Analytics team, the RG function will be empowered to improve the identification of patterns and typologies, which will then be used to refine Crown's approach to addressing problem gaming.

The plan also includes other important enhancements that are described in the appendix to this letter.

Crown would be happy to meet with you at your convenience to discuss these enhancements to Crown's responsible gaming program.

Kind regards

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Our Ref AQMM:120999183

AQMM 514639994v1 120999183 26.5.2021

Appendix
Responsible Gaming Enhancements

RESPONSIBLE GAMING ELEMENT	ENHANCEMENTS
Time limits on play	<ul style="list-style-type: none"> • Crown will introduce the following time limits on playing at Gaming Machines, Table Games and Electronic Table Games: <ul style="list-style-type: none"> ○ Domestic Players – 12 hours in a 24 hour period with observation/intervention at eight and 10 hours. Customers will not be able to play for more than 48 hours in a week. ○ International Premium Program Players – staying less than seven days - 18 hours in a 24 hour period with interventions at hours 12, 14 and 16. Players staying for longer than 7 days would align with Domestic Player limits (not applicable to Crown Perth).
State-wide Exclusion Register	<ul style="list-style-type: none"> • Crown will support a state-wide exclusion register in the states in which it operates, as applicable. This would include: <ul style="list-style-type: none"> ○ Self Exclusion ○ Third Party Exclusion • This will be dependent on agreement with other industry participants and privacy considerations, among other complexities. • A staged approach starting with an Australasian Casino Self Exclusion Program to be proposed.
Bingo	<ul style="list-style-type: none"> • Prior to lockdown, Crown Melbourne has previously offered Bingo for Crown Rewards members. This program will cease.
BUS/Red Carpet Program	<ul style="list-style-type: none"> • Prior to lockdown, Crown Melbourne offered the 'Red Carpet Program', where community groups organise a group of members and arrange transport (by Bus) to Crown Melbourne. Participants are offered food and beverage and potentially funds toward the bus hire. This program will cease. • Prior to lockdown, Crown Perth operated line runs and offered a program allowing community groups to arrange a group visit to Crown Perth (bus organised by Crown Perth). Participants would purchase a Bus Pack of offers. This program has not operated since the initial COVID-19 lockdown, ceasing on March 23, 2020. It will not operate going forward.
Diversity of RG staff	<ul style="list-style-type: none"> • Crown will recruit additional Responsible Gaming Advisors, with priority given to those from Culturally and Linguistically Diverse (CALD) backgrounds including language skills that are underrepresented in the staff profile but overrepresented in persons experiencing harm from gambling.

Cashless	<ul style="list-style-type: none"> • Subject to the direction of the respective State governments, it is Crown's intention to move to cashless gaming over time. The main way to fund gaming activity would be via the introduction of a digital wallet for all games which would include enhanced RG functionality. For casual gaming machine players this could be via a ticket that can be purchased at the cage or ticket machines. • ATMs will still be placed no closer than 50m from the gaming floor for Crown Melbourne and 40m for Crown Perth. • Note acceptors will not allow for more than \$500 cash to be inserted at any one time in respect of uncarded play. With the exception of one older game theme, note acceptors for gaming machines at Crown Perth are currently restricted to \$100. • An enterprise approach would be contemplated by the Crown Resorts Digital Payment Steering Committee in consultation with relevant parties.
Marketing Offers	<ul style="list-style-type: none"> • Controls have been put in place to ensure that direct to member offers do not require customers to exceed historical behaviours (spend or visit frequency) in order to get their first benefit. No offers outside of this control have been sent to customers since reopening.
Crown Rewards	<ul style="list-style-type: none"> • Operational: Crown will replace gaming vouchers on signing up to the Crown Rewards Program with a non-gaming/promotional voucher instead. • Review/Research of the Loyalty Program: The objective of this research will be to determine if there are any aspects of the Loyalty Program that may be causing harm and what measures can be put into place control those risks. Considerations are: <ul style="list-style-type: none"> ○ Engagement of an external independent researcher ○ Release of customer data – to be anonymised ○ A reliable read on the extent of the causal direction between the association of elements of the Loyalty Program and problem gambling. This is complex as been noted in academic research ○ Establish a way to ensure the research can provide direction on any causal relationship to problem gambling ○ A consultative process with the researcher in the design and methodology
Gaming Sales staff incentives	<ul style="list-style-type: none"> • Currently, no Gaming Sales staff participate in a Sales Incentive Plan which involves turnover-based incentives. This will not change. All future employee incentive plans will consider RG implications.