

Royal Commission into Crown Melbourne

Schedule 1

No	Provision(s) of the legislation / contracts which have or may have been breached	Details of acts or things which constitute breach or potential breach	Steps taken to remedy the breach or potential breach	Date of relevant conduct	Steps taken to ensure that the breach or potential breach will not be repeated
1	<p><i>Casino Control Act 1991 (Vic)</i>, ss 60(2)(c) and 121(4)</p> <p>Internal Control Statement</p>	<p>The game of Pontoon was dealt one card short, the missing card was later found under the Automatic Shuffling Machine. It is further alleged that Crown failed to notify the VCGR of the matter until five days after the incident had occurred.</p> <p>A show cause notice was issued by the VCGR on 3 May 2011. Crown provided a responsive submission on 19 August 2011.</p> <p>On 25 October 2011, the VCGR determined that Disciplinary Action was warranted, however, after consideration of Crown's submission, the VCGR issued Crown with a Letter of Censure with no fine.</p>		19 May 2010	
2	<p><i>Casino Control Act 1991 (Vic)</i>, ss 60(2)(c) and 121(4)</p> <p>Internal Control Statement</p>	<p>The game of Texas Hold'em Poker was dealt three hands with 51 rather than 52 cards – the missing card was subsequently located in the Automatic Shuffling Machine.</p> <p>A show cause notice was issued by the VCGR on 3 May 2011. Crown provided a responsive submission on 19 August 2011.</p> <p>On 22 September 2011, the VCGR issued Crown with a \$10,000 fine, which was paid on 29 September 2011.</p>		10 June 2010	

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3	<p><i>Casino Control Act 1991 (Vic), ss 60(2)(c) and 121(4)</i></p> <p>Internal Control Statement</p>	<p>The game of Poker was played with less than the required number of cards for eight hands, due to a Dealer error.</p> <p>A show cause notice was issued by the VCGR on 21 June 2011. Crown provided a responsive submission on 26 August 2011.</p> <p>On 7 October 2011, the VCGR determined that Disciplinary Action was warranted, however, after consideration of Crown's submission, the VCGR issued Crown with a Letter of Censure with no fine.</p>		21 October 2010	
4	<p><i>Gambling Regulation Act 2003 (Vic), s 10.7.6(3)</i></p> <p>Internal Control Statement</p>	<p>Two minors accompanied by their mother (tourists from Germany), were detected at the Atrium Bar by a VCGR Inspector.</p> <p>A show cause notice was issued by the VCGR on 5 September 2011. Crown provided a responsive submission on 4 November 2011.</p> <p>On 28 November 2011, the VCGR issued Crown with a \$5,000 fine, which was paid on 12 December 2011.</p>		17 January 2011	
5	<p><i>Gambling Regulation Act 2003 (Vic), s 10.7.6(1) and (3)</i></p>	<p>On 1 January 2013, three minors were located by the VCGLR in Pit 4. A Duty Security Manager and a Responsible Gaming Liaison Officer attended and the minors were escorted from the gaming floor. The minors claimed that they entered the</p>	<p>The General Manager of Security Services was interviewed in relation to the incident. A Security Event Report was not completed and the Security Manager at the time of the incident is no longer an employee of Crown.</p>	1 January 2013	

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		<p>gaming floor via the Monte Carlo Entry point at 0140hrs; however, a review of footage at the time failed to locate the minors entering. Additionally, two of the three minors were alleged to have gambled.</p> <p>On 20 December 2013, the VCGLR determined that Disciplinary Action was warranted and issued Crown with a fine for \$35,000. On 23 December 2013, Crown made payment by cheque for this amount.</p>			
6	<i>Gambling Regulation Act 2003 (Vic), s 10.7.6(3)</i>	<p>On 14 December 2013, a VCGLR Inspector requested that a Security Officer conduct an ID check of a patron they suspected to be a minor near Pit 8 at the Atrium Bar. The Security Officer confirmed that the patron was a minor (12 years of age) and was escorted off the casino floor via the Monte Carlo Entry point at 2028hrs.</p> <p>The Commission imposed a fine of \$20,000.</p>	<p>The Gaming Machine staff member was counselled regarding the incident and one of the two Security Officers received a First Written Warning and the other received a Verbal Warning.</p>	14 December 2013	
7	<i>Gambling Regulation Act 2003 (Vic), s 10.7.6(3)</i>	<p>On 31 December 2013, a minor was detected on the Mahogany Room terrace by a VCGLR Inspector.</p> <p>A show cause notice was issued by the VCGLR on 17 April 2014. Crown provided a responsive submission on 22 May 2014.</p> <p>On 18 July 2014 (received 22 July 2014), the VCGLR determined that Disciplinary Action was warranted and issued Crown with a</p>	<p>On 3 January 2014, communication was circulated to Mahogany staff regarding Mahogany Room entry procedures and the vigilance around checking ID. The Mahogany Room Receptionist at the ground floor entry when the minor entered was counselled regarding the matter.</p>	31 December 2013	

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		<p>\$10,000 fine (\$5,000 for each minor having entered the casino). The fine was paid on 29 July 2014.</p>			
8	<p><i>Gambling Regulation Act 2003 (Vic), s 10.7.6(3)</i></p>	<p>On 18 January 2014, the VCGLR contacted Security advising that they had detected two minors at Pit 7. The VCGLR escorted the minors off the casino floor at 0239hrs via the Promenade Air Bridge Entry point.</p> <p>Footage revealed that a patron had entered the casino floor via the Promenade Air Bridge Entry at approximately 0215hrs. The patron immediately proceeded to the lift next to Margo's cafe which allowed the two minors waiting at the Mezzanine level to enter the lift and gain access to the casino floor.</p> <p>The patron was issued with a Withdrawal of Licence for assisting the minors (both aged 17 at the time of the incident) in gaining access to the casino floor.</p> <p>On 17 April 2014, Crown received a Notice to Show Cause from the VCGLR. On 22 May 2014, Crown provided a response.</p> <p>On 18 July 2014 (received 22 July 2014), the VCGLR determined that Disciplinary Action was warranted and issued Crown with a \$10,000 fine (\$5,000 for each minor having entered the casino).</p>	<p>On 24 January 2014, Security re-evaluated the position of the Security Officer stationed at the Promenade Air Bridge Entry point. It was decided the Security Officer will be repositioned to the front of the control zone (in-line with all other casino entries) which is situated at the top of the escalators. This vantage point will allow the Security Officer to better monitor the persons entering the casino floor (via the lift or the escalators).</p>	18 January 2014	

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9	<i>Gambling Regulation Act 2003 (Vic)</i> , s 10.7.6(3).	<p>On 1 August 2014 at approximately 2252hrs, a minor, accompanied by four other patrons, entered the casino floor presenting the ID of another person. The minor was detected by the VCGLR and escorted from the casino floor at 2259hrs.</p> <p>Crown made a submission under s 10.7.12 of the <i>Gambling Regulation Act 2003 (Vic)</i> which provides a defence if the minor was above the age of 14 years at the time the offence was committed (she was 17) and there was produced acceptable proof of age for the minor.</p> <p>The VCGLR considered Crown's submission and issued a Letter of Censure.</p>		1 August 2014	
10	<i>Casino Control Act 1991 (Vic)</i> , ss 60(2)(c) and 60(3)(c). Semi-Automated Table Games Rules, r 2.2.2	<p>It was alleged that there was no Dealer Terminal connected to Semi-Automated Table Games (SATG) table 2608, an alleged breach of ss 60(2)(c) and 60(3)(c) of the <i>Casino Control Act</i> and Rule 2.2.2 of the SATG Rules.</p> <p>The terminals at 2608 are connected to two Dealer Terminals remotely. Rule 2.2.2 does not provide for any required proximity of the Dealer Terminal to the table.</p> <p>On 16 October 2014, the VCGLR agreed that Crown was not in breach of Rule 2.2.2 of the SATG Rules — matter closed.</p>		Resolved on 16 October 2014. Unclear when the issue was first raised.	The VCGLR requested that a review and amendment of Rule 2.2.2 of the SATG Rules be conducted in collaboration with Crown to eliminate confusion in relation to the Dealer Terminal and that in the interim, Crown remove the Table Licence Number currently on table 2608.

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11	<i>Casino Control Act 1991 (Vic), s 81AAC</i>	<p>On 12 March 2015, VCGLR Inspectors were on site at Crown and observed an allegedly intoxicated patron on Big Wheel.</p> <p>At or about the same time, Crown staff were undertaking intoxication assessments and refused the patron's bet and asked him to leave.</p> <p>The VCGLR investigated the matter for a possible breach of s 81AAC of the <i>Casino Control Act 1991</i> and requested statements from Crown which Crown has provided.</p> <p>On 2 July 2015, the VCGLR advised that it would not be proceeding with the alleged breaches as it accepted that the Casino Area Manager intervened independently before the bets and the service of alcohol.</p>	The Casino Area Manager intervened before any bets were placed or alcohol was served.	12 March 2015	
12	<i>Casino Control Act 1991 (Vic), s 116</i>	<p>On 20 November 2015, the VCGLR issued Crown with a letter requesting the payment of penalty interest in accordance with s 116(1) of the <i>Casino Control Act</i>.</p> <p>Crown's August 2015 Gross Gaming Revenue (GGR) Report had incorrectly overstated jackpot winnings, resulting in \$41,842.79 underpayment of gaming tax for the period. The \$41,842.79 was added to the following month's GGR calculation (September 2015).</p>		August 2015	

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		<p>The penalty interest calculated for the period the tax was unpaid (one month) was \$326.72.</p> <p>Crown chose not to dispute the letter and submitted a cheque to the VCGLR for the amount of \$326.72.</p>			
13	<p><i>Casino Control Act 1991 (Vic)</i>, s 60(2)(c)</p> <p>Fully-Automated Table Games Rules, r 3.9</p>	<p>On 30 March 2016, the VCGLR issued Crown with a Notice to Show Cause in relation to an operational change to the fully-automated table games (FATGs) configuration. It is specifically alleged that for a period, there was no ability to set daily loss and time limits on FATGs.</p> <p>This was allegedly in breach of Rule 3.9 of Crown's FATG Rules and, consequently, s 60(2)(c) of the <i>Casino Control Act</i>. Crown submitted that the change had been noted to the Government in advance, when Crown provided that turning off Play Safe Limits for Electronic Gaming Machines (EGMs) (as required under the Act) would also turn off the service on FATGs.</p> <p>On 19 July 2016, the VCGLR determined the Disciplinary Action was warranted and issued Crown with a Letter of Censure and a \$25,000 fine.</p> <p>On 26 July 2016, Crown paid the fine.</p>	<p>Play Safe was subsequently reintroduced on FATG's on 12 July 2016 allowing players to set time and loss limits.</p>	<p>From 10 November 2015</p>	<p>Crown reinstated the ability to set daily loss and time limits on FATGs.</p>

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14	<p><i>Casino Control Act 1991 (Vic)</i>, ss 20(1) and 121(4).</p> <p>Junket and Premium Player Programs Internal Control Statement</p>	<p>On 28 December 2016, the VCGLR issued Crown with a Notice to Show Cause under s 20(1) of the <i>Casino Control Act</i> in relation to alleged breaches of Crown Melbourne's Junket and Premium Player Programs Internal Control Statement. The VCGLR alleged 21 breaches by Crown Melbourne in relation to recordkeeping regarding five Junket Player Programs.</p> <p>Between 28 December 2016 and 6 December 2017, Crown provided information and made various submissions to the VCGLR in relation to the matter.</p> <p>On 4 April 2017, the VCGLR notified Crown that seven of the 21 claimed breaches were withdrawn.</p> <p>On 6 December 2017, the VCGLR determined to issue Crown with a fine of \$150,000, which Crown paid.</p>	<p>Crown reverted to drafting the player names on the cover sheet of Programs instead of attaching the print out from the system. Crown also put staff names into the system in drop boxes, so there could be no further difficulty with reading signatures. Additionally, Crown made a submission to have the system as the official record (which the VCGLR Inspectors have access to and audit daily), rather than on the papers, which is open to human error; however, this submission was declined.</p> <p>Communication went out as to the quality of staff hand writing.</p> <p>Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020.</p> <p>See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.</p>	Date of programs range from July 2015 - September 2015	

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15	<i>Gambling Regulation Act 2003 (Vic)</i> , s 10.7.6(3)	In April-June 2017, there were matters relating to minors entering the casino floor.		April to June 2017	
16	<i>Casino Control Act 1991 (Vic)</i> , 121 Junket and Premium Program Players Internal Control Statement, cl 2.4.1	<p>On 1 March 2019, the VCGLR issued Crown with a Notice to Show Cause (Notice) for contraventions of s 121 of the <i>Casino Control Act</i> on the basis that Crown allegedly failed to notify the Commission of a new Junket Operator under cl 2.4.1 of the Internal Control Statement (ICS).</p> <p>On 7 May 2019, the Commission wrote to Crown, commenting that it was satisfied that a ground for disciplinary action was established on the basis that Crown contravened a provision of the Act.</p> <p>The Commission imposed a \$25,000 pursuant to s 20(4)(a) of the <i>Casino Control Act</i>.</p>	<p>On 29 March 2019, Crown responded to the Commission, maintaining that the error was administrative in nature and was not a deliberate act committed to conceal or deceive the Commission or the general public.</p> <p>Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020.</p> <p>See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.</p>	3 - 8 May 2017 30 Nov- 12 Dec 2017 17 - 25 June 2018	
17	<i>Gambling Regulation Act 2003 (Vic)</i> , s 10.7.6(3)	On 7 September 2017, there were two incidents involving a minor entering the Casino.	The relevant security officers received additional coaching following the incidents.	7 September 2017	

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18	<i>Gambling Regulation Act 2003 (Vic)</i> , s 10.7.6(3)	On 18 September 2017, at approximately 2331 hours, a minor entered the gaming floor at the Monte Carlo entry point. The minor presented a friend's Victorian Learners Permit to gain entry, but subsequently lost his wallet on the gaming floor, which was then handed to Lost Property. The minor attended Lost Property and enquired if his wallet had been located, it was then discovered that he was indeed a minor and was escorted away from the gaming floor (0130 hours) via the Western Entry.	The minor was escorted away from the gaming floor when it was discovered he was a minor. MSS officer was coached to request assistance should she have any identification concerns.	18 September 2017	
19	<i>Casino Control Act 1991 (Vic)</i> <i>Gambling Regulation Act 2003 (Vic)</i>	Between 8 November 2017 and 8 December 2017, the VCGLR investigated Crown Melbourne in relation to the use of 'blinking buttons' by Crown Melbourne on 17 gaming machines for a three-and-a-half-week period. The VCGLR's investigation included issuance of two Notices under s 26(1) of the <i>Casino Control Act</i> to provide information in relation to the relevant gaming machines, and a Notice to Show Cause under s 20(2) of the <i>Casino Control Act</i> alleging that Crown had varied gaming machine types and games without approval. Crown Melbourne complied with the VCGLR's Notices issued under the <i>Casino Control Act</i> by providing the VCGLR with the	As part of a broader initiative to enhance Crown Melbourne's compliance processes, Crown: <ul style="list-style-type: none"> • Reviewed internal control and approval processes for new gaming products, or changes to existing gaming products and made amendments to the Gaming Machines Internal Controls. • Introduced a new 'Gaming Initiatives Form' that requires approval from Crown Melbourne's AML, Security, IT, Surveillance, Responsible Service of Gaming, and Regulatory & Compliance Departments for all new gaming initiatives to mitigate future risks. 	March and April 2017	See 'Steps taken to remedy the breach or potential breach' column.

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		<p>requested information, including further submissions.</p> <p>The VCGLR determined to issue a Crown Melbourne with a letter of censure and a fine of \$300,000, which Crown paid.</p> <p>On 24 December 2018, Crown provided the VCGLR with documents and information in relation Crown's enhanced compliance regulatory framework. The VCGLR informed Crown Melbourne on 10 May 2019 that the VCGLR would monitor Crown's implementation of the new compliance regulatory framework.</p>			
20	<i>Gambling Regulation Act 2003 (Vic)</i>	<p>Allegations of compliance breaches were raised by Andrew Wilkie MP relating to the use of Crown issued picks to hold the EGM button down for continuous play and multiple cards issued to patrons.</p> <p>The VCGLR served Crown with a Notice pursuant to s 26 asking Crown to provide any authorisations for the picks and requesting answers to questions relating to picks (eg, when were they made, how many were made, etc). Crown provided copies of historic Regulator Rules, which permitted the use of picks.</p> <p>On 21 March 2019, the VCGLR wrote to Crown advising that it had concluded its</p>	Crown had already ceased the practice of issuing picks to patrons earlier in 2018, prior to Mr Wilkie raising the matter.	April 2018	

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		<p>investigation into the issue and use of multiple player cards and found that Crown had not contravened any Victorian laws. The VCGLR further noted that they have referred the matter to the Victorian Department of Justice and Community Safety to determine whether regulatory reform was necessary.</p> <p>The VCGLR determined that no disciplinary action would be taken against Crown for use of the picks, however, it determined to issue a Direction to Crown under s 23 of the Act: 1. Crown must not issue or supply to patrons any button picks or like items (being any item or device designed to hold down or continuously depress an electronic gaming machine button) for use on any EGM in the Melbourne casino; 2. Crown must take all reasonable steps to ensure that button picks or like items (as described above) are not used by patrons for gaming on EGMs in the Melbourne casino. Crown had voluntarily ceased the issuance of picks months prior to these processes.</p>			
21	<i>Casino Control Act 1991 (Vic)</i>	The VCGLR wrote to Crown regarding the T&Cs of the 2017 Aussie Millions Poker Tournament. The T&Cs provided that the tournament would be held at the Crown Complex 'on the casino gaming floor'; however, Crown held a number of non-cash	Crown replied to the VCGLR's queries setting out that it was an oversight by Compliance in drafting the T&C's. The employee tasked with amending the T&Cs no longer works at Crown.	June 2018	

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		<p>events off the gaming floor at the Conference Centre.</p> <p>The VCGLR advised that there would be no further action on this matter.</p>			
22	<i>Gambling Regulation Act 2003 (Vic)</i>	Errors in EGM Game IDs were identified in approval letters from the VCGLR/Accredited Testing Facilities (ATF) .	One of those products was removed from the floor and a request was made to the VCGLR for letters to be reissued containing the correct numbers, which occurred.	May-July 2018	
23	<i>Gambling Regulation Act 2003 (Vic)</i>	EGM touchscreen errors were identified, in that selecting the PID option the machine reverted to game play instead of providing the player with the government information.	The machine was recalibrated and the error corrected.	March 2018	A full floor audit was undertaken and a number of calibrations performed.
24	<i>Gambling Regulation Act 2003 (Vic)</i>	The Gaming Machines Department has been running a linked jackpot on a stand-alone machine, despite the Technical Requirements Document requiring at least two machines to form a linked jackpot. However, a review of the jackpot's approval from the VCGLR approved the linked jackpot on a single machine.	The machine was removed from the floor and future linked jackpots were operated with at least two machines	May 2018	
25	<i>Casino Control Act 1991 (Vic)</i>	A number of tables in VIP areas were automatically having their table limit increased in response to Tangam recommendations, without providing the legislatively required 20 minutes notice.	The issue was rectified as soon as it was brought to management's attention.	May 2018	

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26	<i>Casino Control Act 1991 (Vic)</i>	<p>The VCGLR wrote to Crown on 1 June 2018, seeking footage of a Chip Rotation in the Main Cage on 25 May 2018. A VCGLR audit revealed that the log of rotations was not completed on that date.</p> <p>Footage from the day did not show the chips being rotated. 'Rotation' in the context of the Cage is not applied as moving chips to the front from the back, but rather as rippling the chips with the staff member's hand in order to see if there are any discrepancies with the chips.</p>	The Cage was been asked by Compliance to ensure the chips are rotated in accordance with the Standard Operating Procedure (SOP) and a submission was prepared to alter the rotation requirement.	May 2018	An update to the Cage SOP was made to change the language of the process from rotation to verification and/or rotation.
27	<i>Casino Control Act 1991 (Vic)</i>	Table Games closed a FATG in SYCO (Casino Management System) but left half of the terminals operating for approximately six hours on the gaming floor.	<p>The matter was self-reported to the VCGLR on 11 July 2018.</p> <p>No further contact has been received from the VCGLR on this matter</p>	July 2018	
28	<i>Casino Control Act 1991 (Vic), s 121(4)</i> Junket and Premium Player Program (including VIP Telephone Betting and the Introduction of Players) Internal Control Statement	<p>On 31 October 2018, the VCGLR emailed Crown requesting a copy of the 2014 notification of a new Junket Operator to update their computer system. On 1 November 2018, Crown responded to the VCGLR by forwarding a copy of the initial notification via email.</p> <p>The new Junket Operator signed his Agreement on the 24 April 2014, played in May 2014, with Crown notifying the VCGLR on 10 September 2014.</p>	<p>Investigations indicate that a former employee appears to have failed to send the Notification in a timely manner</p> <p>This matter was addressed by the VCGLR at the time, in 2014.</p> <p>Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's</p>	September 2014	

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			<p>dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020.</p> <p>See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.</p>		
29	<p><i>Casino Control Act 1991 (Vic), s 121(4)</i></p> <p>Internal Control Statements</p>	<p>On 17 October 2018, the VCGLR wrote to Crown alleging that Crown had written off a debt in excess of \$5M without permission.</p> <p>The matter arose from a change in the exchange rate between when the write-off document was first signed, to when the final signature was added and it was processed.</p>	<p>Crown processed an adjustment to correct the bad debt write-off in the Gross Gaming Report to align with the amount stated in the Notification submitted to the VCGLR on 26 June 2018 (approx. \$4.9M)</p>	October 2018	<p>Crown agreed to ensure that the internal approval date, SYCO date and VCGLR notification date, all coincided.</p>
30	<p><i>Casino Control Act 1991 (Vic) s 62AB(2)</i></p> <p><i>Gambling Regulation Act 2003 (Vic)</i></p>	<p>On 27 September 2018, the VCGLR issued Crown with a s 26 notice requesting information pertaining to EGM C8303 operating in continuous play mode (alleged as 'unrestricted mode' in the notice), when a Your Play card was not inserted.</p>	<p>The cause was a wiring fault, which permitted the machine to imitate play in continuous mode if a particular button was held down.</p> <p>On 14 January 2021, the VCGLR issued Crown with a Notice of Non-Compliance.</p> <p>No further action was taken by the VCGLR.</p>	September 2018	<p>A full audit of all machines was carried out. An enhancement to the audit and checking procedures was implemented.</p>
31	<p><i>Casino Control Act 1991 (Vic)</i></p>	<p>A Poker tournament entry was uploaded and opened on the Crown website prior to the required T&Cs being published on the website.</p>	<p>The Digital Team had not prioritised the upload. The Digital Team was spoken to about the matter, the T&Cs were then uploaded with urgency.</p>	September 2018	<p>The Poker Team has now implemented a process whereby they will now check the website for the T&Cs</p>

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					before opening tournament entries.
32	<i>Casino Control Act 1991 (Vic), s 121(4)</i> Internal Controls	Two Automated Transaction Station drop boxes were removed from tables during the drop box run and placed on the floor whilst an unrelated issue was resolved. The boxes were inadvertently not retrieved and left on the floor for approximately 2 days.	Human error/oversight caused the issue.	October 2018	The drop box run process was reviewed. Staff were reminded as to the importance of being diligent in this process.
33	<i>Casino Control Act 1991 (Vic), s 121(4)</i> Internal Control Statement	On 1 November 2018, a small number of gaming tables operated for gaming while being closed in the SYCO system. It is understood that the tables were rolled as per standard procedure from old gaming day to new gaming day via the Automated Table Operations Management unit and appeared to appropriately open on the new gaming day but then sometime later reverted back to closed status in SYCO. The tables involved were AR0926, TH0716 and AR0907.	Crown IT advised that its investigation showed that only one table (AR0907) was affected, but it was unable to determine the root cause of the fault.	November 2018	
34	<i>Casino Control Act 1991 (Vic), s 121(4)</i> Internal Control Statements	The VCGLR wrote to Crown seeking an explanation as to why the Commission was not notified of a new Junket Operator prior to commencing dealings with Crown Melbourne. On 29 March 2019, Crown responded to the Notice. Crown stressed that the matter was administrative in nature and not a deliberate act committed to conceal or deceive the	Crown informed the VCGLR that its review of the matter indicated that human error was the cause of the issue. Crown noted to the VCGLR that the new Junket Operator had passed probity checks and was approved to operate at Crown Perth. Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements	August 2018	Crown's Compliance Department and VIP International Department reviewed the process and made changes to safeguard against a repeat error of this nature.

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		Commission. On 7 May 2019, the VCGLR issued Crown with a \$25,000 fine. On 14 May 2019, a cheque was sent to the VCGLR.	were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020. See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.		
35	<i>Casino Control Act 1991 (Vic)</i> , s 121(4) Clause 3 of the Terms and Conditions of the Table Games Junket Program Agreement. Internal Control Statement	On 25 October 2018, the VCGLR wrote to Crown requesting an explanation in relation to the amount of commission paid on an International VIP program. The letter sought an explanation as to why commission was paid for play on Pai Gow, when clause 3 of the Program Agreement provided that it would be paid for play on Baccarat and Roulette only.	A communication breakdown between VIP Operations and Table Games was originally thought to have led to an oversight. However, further review shows that the play on Pai Gow was requested by the Group, as permitted under the Agreement.	October 2018	A change was made to clause 3 of the Program Agreement, to better clarify the discretion to be applied to the games that attract commission.
36	<i>Casino Control Act 1991 (Vic)</i> , ss 62AB and 62	On 30 November 2018, during a routine gaming machine audit, an issue was identified with the Ainsworth Gaming Technology (AGT) game base. The AGT game base permitted continuous play mode to be active for approximately six to nine seconds after an eligible player card was	All AGT EGMs across the gaming floor were placed into 'maintenance mode' overnight. On 1 December 2018, the impacted EGMs were changed to Restricted Mode and switched back into game play. The VCGLR on site	November 2018	All six Game Recommendations were approved by the VCGLR and implemented.

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		<p>removed from an unrestricted EGM. The lag in transition from Unrestricted to Restricted impacted 134 EGMs across the floor and meant that up to two to three more games could be played in Unrestricted Mode before the system registered that the card had been removed.</p> <p>A Significant Event Report was completed, with the matter escalated to the manufacturer for investigation. The manufacturer's investigation revealed that an issue exists within the game code. A fix has been developed which has been tested by Crown (successfully) and was tested by the ATF on the week commencing 21 January 2019, for recommendation to the VCGLR.</p>	<p>Inspectorate was notified of the issue by phone on 4 December 2018.</p>		
37	<i>Casino Control Act 1991 (Vic), s 56(1)(c)</i>	<p>As a result of an administrative oversight, the IT department failed to process employee terminations within seven days of the cessation of employment of two contractors; both holders of a Casino Special Employee Licence. Crown has a reporting obligation pursuant to the <i>Casino Control Act</i> to report a cessation of a Licensed employee within seven days.</p> <p>As at 13 May 2019, no contact from the VCGLR had been received on the matter.</p>	<p>Both employees were placed onto the relevant Cessation Report to the VCGLR.</p>	November 2018	<p>On 26 November 2018, the Regulatory and Compliance Department sent a reminder to the Human Resources and Business Operations Team teams outlining Crown's obligations pursuant to the Act.</p>

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38	<p><i>Casino Control Act 1991 (Vic)</i></p> <p><i>Gambling Regulation Act 2003 (Vic)</i></p> <p><i>Gambling Regulations 2015 (Vic), r 8(3)(b)</i></p>	<p>On 6 December 2018, the VCGLR wrote to Crown alleging that on 20 November 2018, five EGMs audited by VCGLR Inspectors were found to be below the required illuminance level of 30 LUX (EGM F8704, F5108, F5109, F5110 and E4406). The VCGLR requested the outcome of any action taken by Crown to rectify this.</p> <p>On 14 December 2018, Crown responded to the letter advising that four of the five EGMs were placed into 'maintenance mode' until the illuminance level could be maintained at the required Gambling Regulation Act 2003 (Vic) level (all machines are tested for the LUX level upon layout changes). Crown requested that the VCGLR provide the correct EGM number for the fifth EGM (E4406), as the location did not exist on the gaming floor.</p> <p>On 18 December 2018, the VCGLR advised Crown of the correct EGM number of the fifth machine (F4406), the EGM was subsequently placed into 'maintenance mode' and the illuminance level was increased to meet the standard.</p>	<p>Crown purchased four additional LUX meters that are the same model as those used by the VCGLR.</p> <p>Gaming Machines was also working towards a program with Maintenance to increase the frequency of the illuminance audits.</p>	December 2018	Crown conducts daily spot check audits.
39	<p><i>Count Room and Drop Box, Drop Bucket and Note</i></p>	<p>On 12 December 2018, Finance requested a follow up from the Cage after an Ernst & Young audit observation was received</p>	<p>Cage and Count worked with the Regulatory and Compliance Department to update the SOP to reflect the current</p>	December 2018	<p>See 'Steps taken to remedy the breach or potential breach' column.</p>

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	<p><i>Stacker Collection SOP cl.7.4.1(a)</i></p> <p><i>Casino Control Act 1991 (Vic), s 121(4)</i></p> <p><i>Casino Agreement, cl 28</i></p>	<p>regarding the test count process for the currency counter. The relevant SOP required test notes to be sourced from the combination safe located in the Count Room, but staff instead were sourcing notes from the first Drop Box collected (as these notes provided a cross-section of currency value and note quality).</p>	<p>practice. A notification of the SOP change was sent to the VCGLR on 2 January 2019 and it is now in operation.</p>		
40	<p><i>Gambling Regulation Act 2003 (Vic), Reg 10.7.7</i></p>	<p>A minor was located on the gaming floor by a VCGLR inspector on 11 August 2018. The minor used his brother's ID to gain access. The VCGLR requested information from Crown related to the incident.</p> <p>Crown responded to the VCGLR's request on 8 November 2018. The on-site Inspectorate has informally notified Crown that this matter has been sent to their Richmond offices for further review.</p> <p>On 6 November 2019, the VCGLR noted that this matter is with its Legal Team for review.</p> <p>On 19 December 2019, the VCGLR wrote to Crown noting that no further action would be initiated in this instance.</p>		August 2018	
41	<p><i>Casino Control Act 1991 (Vic), s 60(2)(c)</i></p> <p><i>Pai Gow Rules, cl 10.2.1</i></p>	<p>On 15 January 2019, the VCGLR wrote to Crown requesting an explanation as to why on 21 August 2018, multiple (alleged) breaches of cl 10.2.1 of the Pai Gow Rules (patrons talking to each other about their</p>		January 2019	

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		<p>hands) occurred on PG8910, thereby contravening s 60(2)(c) of the <i>Casino Control Act</i>.</p> <p>On 7 February 2019, Crown responded to the matter.</p> <p>Crown stated that the game had been dealt in accordance with the Rules of Pai Gow, with adequate supervision from the Area Manager. However, Crown agreed that the Dealer could and should have been more assertive in ceasing the communication between the players.</p> <p>On 14 January 2021, the VCGLR issued Crown with a Notice of Non-Compliance. No further action will be taken by the VCGLR.</p>			
42	<p><i>Casino Control Act 1991 (Vic)</i>, s 60(2)(c)</p> <p><i>Caribbean Stud Poker Rules</i>, rr 7.5.3, 7.51(a) and 7.6.2</p>	<p>On 14 January 2019, the VCGLR wrote to Crown requesting an explanation as to why on 16 October 2018, Caribbean Stud Poker Rules 7.5.3 (63 alleged breaches) — including failing to increment the Jackpot amount, 7.6.2 (three alleged breaches) and 7.5.1(a) (one alleged breach) were not followed by the Dealer on CS0718.</p> <p>On 7 February 2019, Crown responded to the matter.</p> <p>On 14 January 2021, the VCGLR issued Crown with a Notice of Non-Compliance.</p>	<p>The matter arose from human error.</p> <p>Crown accepted that the Dealer made errors when dealing the game and that the oversights were corrected by the Area Manager on duty.</p>	January 2019	<p>The Dealer was issued with the appropriate disciplinary action and has undergone re-training in the Rules and procedures of Caribbean Stud Poker.</p>

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43	<i>Casino Control Act 1991 (Vic), s 60(2)(c)</i> <i>Poker Rule 8.10</i>	On 20 December 2018, the VCGLR wrote to Crown requesting an explanation as to why on 3 December 2018, Poker Rule 8.10 (player was dealt in upon sitting, prior to posting his blind) was not followed by the Dealer on PK10.	On 8 January 2019, Crown responded to the matter. Crown noted human error as the initial cause; however, subsequently when the dealer brought his error to the attention of the Area Manager, the Manager relied on Rule 14.1.1(a)(iv) deeming the hand valid and dealt correctly. On 15 January 2019, the VCGLR on-site Inspectorate verbally advised that the matter is now closed.	December 2018	
44	<i>Casino Control Act 1991 (Vic), s 60(2)(c)</i> <i>Poker Rule 14.2.5</i>	On 6 December 2018, the VCGLR wrote to Crown stating that on 20 October 2018, Inspectors observed an alleged breach of Poker Rule 14.2.5 by the Dealer on PK16. The VCGLR has sought an explanation from Crown as to why the Dealer did not place the 'boxed card' in the 'muck'. On 14 January 2021, the VCGLR issued Crown with a Notice of Non-Compliance. No further action will be taken by the VCGLR.	On 18 December 2018, Crown responded to the letter citing human error as the cause of the incorrect placement of the boxed card. The boxed card was isolated and unable to be used in play and therefore there was no risk to the integrity of the game or any players.	December 2018	The Poker management team and the Dealer have been advised of the importance of compliance with the Poker Rules and SOPs.
45	<i>Gambling Regulation Act 2003 (Vic)</i>	On 21 November 2018, a minor who was a guest in a Villa situated within Crown Towers, accessed a Salon on Level 29 after exiting the lift. The Salon door was open and the child walked in.	VIP has confirmed that all Salon doors must now remain closed at all times.	November 2018	

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		This matter was reported to the VCGLR in the Self-Reporting Quarterly Minors Report.			
46	<i>Gambling Regulations 2015 (Vic)</i> , s 20	<p>On 2 May 2019, the VCGLR wrote to Crown requesting an explanation as to what action had been taken by Crown regarding the Player Information Display (<i>PID</i>) access on the bank of D15 and D1603.</p> <p>Crown informed the VCGLR of its actions on the night and they considered the matter closed.</p> <p>On 6 June 2019, the VCGLR on-site Inspectorate verbally noted that no further action would be taken.</p>	Crown responded to the matter, noting the machine is operating as per the approval. The PID is not available on the first tap of the 'i' button when the button panel is asleep (ie, it requires x2 button taps to activate the 'i' button — one to 'wake' the button panel, and the second to activate the selected button.	May 2019	
47	<i>Casino Control Act 1991 (Vic)</i>	Patron Complaint — Rewards Card Activation. A Crown Rewards member was advised by a Crown employee that they must enter the gaming floor to activate their 'invalid' loyalty card. When the staff member was questioned by the patron, the alleged response was that it was a VCGLR requirement. The patron made a complaint to the VCGLR, who in turn advised the member to make a complaint to Crown.	On 11 February 2019, Crown's Gaming Machines Operations Manager contacted the Member to address the member's concerns and moved the Member to a 'Lifestyle' non-gaming membership. Patrons are not required to enter the gaming floor unnecessarily.	February 2019	Relevant staff were educated as to the correct manner of dealing with these enquiries.
48	<i>Casino Control Act 1991 (Vic)</i> , s 60(2)(c)	On 2 May 2019, the VCGLR wrote to Crown requesting an explanation as to what action Crown had taken regarding the bias/balance of Big Wheel BW3109. The matter relates to		May 2019	

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		<p>a VCGLR inspection of BW3109 on 19 April 2019, with an alleged finding of a 'significant bias', which was disputed by Crown staff.</p> <p>On 5 June 2019, Crown responded to the matter, noting the remedial action that was taken at the time.</p> <p>On 6 June 2019, the VCGLR on-site Inspectorate verbally advised Crown that the matter was closed.</p>			
49	<p><i>Casino Control Act 1991 (Vic), s 60(2)(c)</i></p> <p><i>Roulette Rule 5.3</i></p>	<p>On 2 May 2019, the VCGLR wrote to Crown requesting an explanation as to why on 18 February 2019, Roulette Rule 5.3 was not adhered to on AR2504. It is alleged that the Dealer failed to signal 'no more bets' prior to the ball dropping, on multiple occasions. It is also alleged that the Dealer failed to return the late bets.</p> <p>On 12 June 2019, Crown received a Letter of Warning for a breach under s 60(2)(c) of the <i>Casino Control Act</i>.</p>	<p>On 31 May 2019, Crown responded to the matter, noting that the Dealer believed that he was providing 'good customer service' by allowing late bets to stand. The Dealer failed to realise that his conduct may have caused a breach of the Rules, and was subsequently issued the appropriate disciplinary action.</p>	May 2019	<p>The staff member was coached and the Roulette SOPs were reiterated. American Roulette SOPs were focused on over the next period to ensure Dealers were compliant. Emails were sent to managers to reinforce adherence to the SOPs. Surveillance monitoring continues to occur. As a response to this and other matters, Crown has engaged a team of Table Games managers to conduct audits across the floor to ensure Dealers are consistently dealing in line with SOPs and Rules.</p>

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50	Casino Control Act 1991 (Vic), s 60(2)(c) <i>Roulette Rule 5.3</i>	<p>On 2 May 2019, the VCGLR wrote to Crown requesting an explanation as to why on 18 February 2019, Roulette Rule 5.3 was not adhered to on AR0903. It is alleged that the Dealer failed to signal 'no more bets' prior to the ball dropping on a single occasion.</p> <p>On 12 June 2019, Crown received a Letter of Warning for a breach under s 60(2)(c) of the <i>Casino Control Act</i>.</p>	<p>On 31 May 2019, Crown responded to the matter noting that upon review, Crown is satisfied that the Dealer dealt the game correctly and in accordance with the Rules. Crown provided that due to the nature of Roulette, a decision to allow or deny bets can at times be a split second decision. It was also noted that the Dealer signalled 'no more bets' (inclusive of ringing the bell and extending his arms).</p> <p>On the night of the allegation, the Table Games Area Manager on duty was approached by the VCGLR Inspector, the interaction resulted in the Dealer receiving on the spot coaching around the importance of the integrity of the game.</p>	May 2019	Surveillance agreed to monitor clean hands and call down to the floor immediately. Dealers are receiving on the spot coaching around the importance of the integrity of the game. As a response to this and other matters, Crown has engaged a team of Table Games managers to conduct audits across the floor to ensure Dealers are constantly dealing in line with SOPs and Rules.
51	<i>Casino Control Act 1991 (Vic), s 81AAC</i>	<p>On 26 March 2019, the VCGLR requested Crown to provide footage of a patron who was alleged to have gambled while intoxicated. It is alleged that the patron placed a bet on Roulette 3112 at approximately 0528 hours.</p> <p>The VCGLR also requested a statement from the Dealer and an Food & Beverage employee involved.</p>	On 4 April 2019, Crown provided the VCGLR with the requested footage. On 3 May 2019, Crown became aware that archived footage of the incident was corrupted. The VCGLR has been provided with all employee statements and available footage (inclusive of the corrupted file).	March 2019	Surveillance worked with the manufacturer to identify the cause of the corrupted file. Crown has enhanced Dealer training regarding Responsible Service of Alcohol matters.

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52	<p><i>Casino Control Act 1991 (Vic), s 60(2)(c)</i></p> <p>Poker Rule 17.4.1 and 17.6.1</p>	<p>On 28 March 2019, the VCGLR wrote to Crown seeking an explanation as to why, on 10 March 2019, an alleged breach of Poker Rule 17.4.1 and 17.6.1 occurred on PK17 between 0430 and 0544 hrs.</p> <p>The VCGLR alleged that the Dealer failed to activate the Jackpot Button on multiple occasions and did not alert the Table Games Area Manager (or above) to remedy the situation.</p> <p>On 15 April 2019, Crown responded to the matter.</p> <p>On 14 January 2021, the VCGLR issued Crown with a Notice of Non-Compliance. No further action will be taken by the VCGLR.</p>	<p>The Dealer received disciplinary action and the Poker team received additional extensive briefing to ensure adherence with Rule 17.4.1 and 17.6.1.</p>	<p>March 2019</p>	
53	<p><i>Casino Control Act 1991 (Vic), s 121(4)</i></p> <p><i>Casino Agreement, cl 28</i></p>	<p>On 18 March 2019, an alleged breach of the SOP occurred on MT0652 (Sic Bo).</p> <p>A job was logged with Maintenance to clean the dice, however, it was discovered that the seal was broken (a VCGLR Inspector was not in attendance when this occurred).</p> <p>On 6 June 2019, the on-site Inspectorate verbally advised Crown that the matter is closed.</p>	<p>The VCGLR asked Crown to review whether the VCGLR should be removed as part of the seal process.</p>	<p>March 2019</p>	<p>The Regulatory and Compliance Department was asked to amend the SOP to remove the VCGLR from the seal process, to be replaced by a Crown managed seal. The change was notified to the VCGLR on 30 October 2019.</p>
54	<p><i>Casino Control Act 1991 (Vic), s 60(2)(c)</i></p>	<p>On 28 February 2019, the VCGLR wrote to Crown noting no further action would be taken against Crown in regards to an</p>		<p>February 2019</p>	

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	Blackjack Rule 7.5.1	incident that occurred on BJ0736 on 23 November 2018. A patron claimed to have been denied the opportunity to indicate his intentions during a hand.			
55	<p><i>Casino Control Act 1991</i> (Vic), s 60(2)(c) Poker Rule 17.4.1 and 17.6.1</p>	<p>On 29 January 2019, the VCGLR wrote to Crown requesting an explanation as to why, on 9 January 2019, Poker Rule 17.4.1 and 17.6.1 were disregarded by the Dealer on PK10. The VCGLR alleged that the Dealer did not activate the jackpot button at the commencement of play, nor notify the Table Games Area Manager to make the appropriate adjustment.</p> <p>On 27 February 2019, Crown responded to the VCGLR noting the seriousness of the matter.</p> <p>On 14 January 2021, the VCGLR issued Crown with a Notice of Non-Compliance. No further action will be taken by the VCGLR.</p>	<p>The Dealer received disciplinary action and the Poker team received extensive briefing to ensure adherence with Rule 17.4.1 and 17.6.1.</p>	January 2019	<p>Table Games sent a note to poker staff regarding this issue and issued file notes and written warnings to relevant staff.</p> <p>The escalated response arose after the Compliance Framework identified a negative trend in this area and rectification action was needed to address the weakness. Area Managers have closely monitored Rule adherence and ensure that Dealers are coached around this on a daily basis. For Dealers who are identified as repeating the behaviour, disciplinary action follows in the form of verbal warnings and written warnings.</p>
56	<p><i>Casino Control Act 1991</i> (Vic), s 60(2)(c) Poker Rule 17.4.1</p>	<p>On 29 January 2019, the VCGLR wrote to Crown requesting an explanation as to why on 8 January 2019, Poker Rule 17.4.1 was disregarded by the Dealer on PK16. The VCGLR allege that the Dealer activated the</p>	<p>On 27 February 2019, Crown responded noting human error as the cause and that this was not an intentional act to manipulate the jackpot or contravene the Rules.</p>	January 2019	<p>Table Games sent a note to poker staff regarding this issue and issued file notes and written warnings to relevant staff. The escalated response</p>

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		<p>jackpot button multiple times during a single hand, thus manipulating the jackpot system.</p> <p>The VCGLR issued Crown with a Notice of Non-Compliance. No further action will be taken by the VCGLR.</p>	<p>The Dealer received disciplinary action and the Poker team received extensive briefing to ensure adherence with Rule 17.4.1.</p>		<p>arose from the Compliance Framework identifying a negative trend in this area and rectification action was needed to address the weakness.</p> <p>Area Managers have closely monitored this Rule for adherence and ensure that Dealers are coached around this on a daily basis. For Dealers who are identified as repeating the behaviour, disciplinary action follows in the form of verbal warnings and written warnings.</p>
57	<p><i>Casino Control Act 1991 (Vic), s 60(2)(c)</i> Poker Rule 7.7</p>	<p>On 29 January 2019, the VCGLR wrote to Crown requesting an explanation as to why on 1 December 2018, Poker Rule 7.7 was disregarded.</p> <p>The VCGLR alleged that the Dealer on PK17 allowed additional commission to be collected.</p> <p>The VCGLR issued Crown with a Notice of Non-Compliance. No further action will be taken by the VCGLR.</p>	<p>On 18 February 2019, Crown responded to the matter. Crown noted human error as the cause, with the error being rectified immediately by the Assistant Casino Manager on duty.</p> <p>Crown emphasised that the Dealer did not intentionally collect additional commission contrary to Poker Rule 7.7. The Dealer received the appropriate disciplinary action and received additional training.</p>	January 2019	<p>Table Games has sent a note to all poker staff regarding this issue and has issued file notes and written warnings to relevant staff.</p> <p>Automation of the Jackpot was being implemented.</p>
58		<p>A Junket claimed a \$300,000 variance in their records.</p>	<p>A SYCO change was requested to remove a SYCO menu item that facilitated the</p>	February 2019	

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		An investigation noted a Table Games Area Manager was present at a computer terminal at the time of the adjustment and may have inadvertently adjusted the rating.	error. This change was implemented in May 2019.		
59	<p><i>Casino Control Act 1991 (Vic), s 121</i></p> <p>Junket and Premium Player Program (including VIP Telephone Betting and the Introduction of Players) Internal Control Statement</p>	On 4 July 2019, a Crown review of a Premium Player Program revealed that an EGM staff member in VIP Slots and a Cage employee failed to sign the Program Agreement.	<p>The matter was detected by Crown as part of its on-going daily due diligence.</p> <p>Surveillance footage was reviewed to identify the relevant staff members and a system audit was undertaken to identify potential staff involved. All staff involved in the process were either spoken to and/or received disciplinary action</p> <p>The Group General Manager — Regulatory and Compliance attended the next VIP Operations and Service Manager monthly meeting to reiterate the importance of completing the forms accurately and delivered compliance training.</p> <p>Comms were sent to all Gaming Machines Senior Managers by the EGM of Gaming Machines, reinforcing the importance of the processes and procedures and emphasising that failure to comply can result in significant disciplinary action.</p>	July 2019	<p>The process of opening a Program was being reviewed to look for opportunities to mitigate recurrence.</p> <p>A process chart was being created by Gaming Machines, to review all areas of the buying / Program process.</p> <p>A review of current system access/functionality was being undertaken to remove non-Cage Managers' access to open Commission Programs.</p> <p>A review of SOP 5.2.1 Premium Player programs was being undertaken and a requirement proposed for all programs to only be opened within the system by the Cage, once all signatures are received.</p> <p>A change to SYCO was being made whereby a pop-up shows on the screen asking if</p>

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					the Agreement has been signed. Further, a SYCO change was been proposed that requires the Cage staff to enter the staff member's ID in SYCO to force a check that it has actually been signed.
60	<i>Casino Control Act 1991 (Vic)</i> , s 121 Junket and Premium Player Program (including VIP Telephone Betting and the Introduction of Players) Internal Control Statement	On 27 June 2019, a Crown review of a Premium Player Program revealed a program had incomplete paperwork. The program was not signed by the patron and the EGM VIP Slots Manager.	The matter was detected by Crown as part of its on-going daily due diligence. Crown rectified the matter and both the relevant staff member and the patron have signed the Agreement as required.	June 2019	A number of additional reviews and changes were undertaken as a consequence of this matter.
61	<i>Casino Management Agreement Act 1993 (Vic)</i>	On 21 May 2019, the VCGLR wrote to Crown advising of penalty interest on a late payment of gambling taxes. A jackpot configuration issue was detected by Crown, which had resulted in a miscalculation of the April 2018 tax assessment (Crown rectified the amount when identified), resulting in penalty interest of \$117.86 being payable. The VCGLR waived the penalty payment on this occasion, but warned that any future penalties for late payments will be pursued.	Crown rectified the discrepancy at the time of the incident.	May 2019	

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62	<p><i>Casino Control Act 1991 (Vic), s 64</i></p> <p>Poker Rules 14.9.5</p>	<p>On 4 July 2019, the VCGLR wrote to Crown requesting an explanation in relation to a patron complaint. The matter related to an allegation that on 14 May 2019, the Dealer on poker table PK3311 exposed the cards too early on the River.</p> <p>On 23 July 2019, Crown responded to the letter defending Crown's position that the Area Managers had made the correct decision given the circumstances.</p> <p>Crown relied on Poker Rules 1.1, 8.8, 18.11 and the patron's behaviour at the time (refusing to comply with a direction to reveal his cards).</p> <p>Crown was verbally notified by the VCGLR on 10 July 2020 that they accepted Crown's position in this matter and it has been closed.</p>		July 2019	<p>As the result of a number of recent VCGLR letters, audits are being undertaken for greater scrutiny of ensuring dealers are dealing in line with SOPs and Rules.</p> <p>A full review by Crown Table Games of its SOPs was undertaken in order to improve education.</p> <p>The following early signs of compliance improvement have been seen:</p> <ul style="list-style-type: none"> • Noticeable improvements seen in the Maple and Mahogany Rooms. • Immediate coaching discussions are occurring, there was more than 80 coaching conversations documented in a week. • Staff are also being rewarded for their positive efforts.
63	<p><i>Gambling Regulation Act 2003 (Vic), s 2.2.1(1)</i></p>	<p>On 22 May 2019, Crown became aware that a number of poker tournaments that were</p>	<p>Managers who were responsible for failing to notify the VCGLR that the tournaments were proceeding, were spoken to. In both</p>	May 2019	<p>An email was sent to other relevant managers, reiterating</p>

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	Table Games Poker Rules	reported to the VCGLR as redacted (that is, not proceeding), were in fact held.	cases the managers were aware but complacent in this instance. Both were issued with verbal warnings.		the importance to notify the VCGLR.
64	<i>Casino Control Act 1991 (Vic)</i> , s 121(4) Junket and Premium Players Program SOP	On 1 August 2019, the Regulatory and Compliance Department became aware of a matter involving Front Money not being recorded in SYCO. The Agreement in place recorded the Front Money correctly.	The staff member involved received conduct counselling.	August 2019	
65	<i>Casino Control Act 1991 (Vic)</i> , ss 68(2)(e) and 121 Internal Control Statement – Cheque Cashing and Credit Facilities (Incorporating Debt Collection and the Discharge of Patron Debts). Cl. 2.4 Discharge of Patron Debts	<p>In July 2019, the VCGLR phoned Crown to discuss Crown's June Write-off of bad debt.</p> <p>On 11 July 2019, Crown wrote to the VCGLR setting out that on 30 June 2019, a number of gaming debts were written off as bad debts in the accounts of Crown Melbourne. The bad debts were added to total monetary prizes, in accordance with s 126-20 of <i>A New Tax System (Goods and Services Tax) Act</i>, for the purposes of calculating the Global GST Amount for the month of June 2019 for Crown Melbourne. The debts range in age from 13 months to 13 years. They remain in SYCO and will not be discharged, as Crown still retains the right to pursue and collect these debts.</p> <p>On 10 September 2019, the VCGLR requested Crown provide to the VCGLR a detailed written explanation outlining Crown's</p>		July 2019	

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		<p>revised approach and how it reached the view that this approach is permitted.</p> <p>On 24 September Crown wrote to the VCGLR by way of an explanation, setting out that Crown referred the matter to both the ATO and Ernst & Young (Crown's auditors) before proceeding.</p> <p>On 8 October 2019, the VCGLR emailed Crown requesting further information, which was provided on 10 October 2019.</p> <p>On 3 March 2020, the VCGLR wrote to Crown noting that it had concluded its assessment and does not object to Crown's approach.</p> <p>The VCGLR will further refine its audit processes in relation to monitoring debts written off and discharged to inform the gaming tax settlement process, and may require further information from Crown to inform this process.</p>			
66	<p><i>Casino Control Act 1991 (Vic)</i>, ss 38 and 45</p> <p>Conditions of Licence (C)</p>	<p>An employee (Gaming Machines) was observed gambling, another employee admitted to providing the employee with complimentary beverages.</p>	<p>The employment of both employees was terminated.</p>	<p>July 2019</p>	

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67	<i>Casino Control Act 1991 (Vic), ss 38 and 56(c)</i>	<p>On 10 September 2019, the VCGLR emailed Crown making enquiries into the employment status of employee #379331. The VCGLR noted conflicting information in that their records indicated that the employee had resigned but may still be working at Crown.</p> <p>On 13 October 2019, the VCGLR wrote to Crown and requested Crown complete a full audit of persons that may be in a similar situation.</p> <p>On 17 October 2019, Crown wrote to the VCGLR confirming that a full audit was carried out on 12 September 2019 which identified 10 employees who required notification to the VCGLR as remaining employed by Crown. Crown also outlined its remedial actions.</p> <p>On 19 December 2019, the VCGLR wrote to Crown advising that although satisfied that a breach had occurred, no further action would be taken.</p>	<p>Following some initial correspondence with the VCGLR, Crown notified the VCGLR that the employee had resigned from their multi-hire Food & Beverage role, however an Employee Change of Advice (ECA) was completed for their gaming role (although HR Management denied the ECA, Compliance was not notified and subsequently included the employee in the VCGLR termination report). Crown noted that the employee had not surrendered (cancelled) their Licence, and continued to be bound by the Conditions of their Licence.</p>	September 2019	<p>Further enhancements to the termination process had been actioned by way of the below:</p> <ul style="list-style-type: none"> • A change had been implemented to the Termination ECA process. The change notified both the Compliance Department and HR Support of any denied/rescinded Termination ECAs at any stage of the process; • HR would provide education regarding how to initiate a Termination ECA and the importance of correctly completing the advice (ie, multi-hire drop downs etc.); • Managers who fail to complete a Termination ECA in the appropriate time, or fail to complete an ECA correctly may face conduct counselling, as well as retraining;

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					<ul style="list-style-type: none"> • Compliance would forward a 'draft' Cessation Report to HR Support each Thursday for review. HR Support will complete a review and report back to Compliance by no later than 12pm every Friday; and • Compliance are now included on all Termination Issue Logs from Table Games. HR now review these on a weekly basis and advise accordingly.
68	<p><i>Casino Control Act 1991 (Vic), a 121</i></p> <p>Internal Control Statement – Junket and Premium Player Programs</p> <p>(V)</p>	<p>On 2 August 2019, the VCGLR requested advice on what the robust probity processes are for Registered Junket Operators, Junket Players and Premium Players, in respect to cl 2.5.1 of the Junket and Premium Player Programs Internal Control Statement.</p> <p>On 7 August 2019, Crown responded to the VCGLR's request, outlining the process for both the initial probity and ongoing probity undertaken at Crown.</p>	<p>Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020.</p> <p>See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.</p>	August 2019	

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69	<p><i>Casino Control Act 1991 (Vic)</i>, ss 121 and 141</p> <p><i>Victorian Commission for Gambling and Liquor Regulation Act 2011 (Vic)</i>, s 9 (V)</p> <p>Internal Control Statement – Junket and Premium Player Programs: cl 2.5.1 and 2.5.2</p>	<p>On 9 August 2019, the VCGLR issued Crown Resorts with a s 26 Notice for information regarding the Junket Operators' process and procedures undertaken by Crown Resorts (and its associated corporate entities, including Crown Melbourne) and the ongoing probity monitoring of junkets by Crown Melbourne.</p> <p>On 14 November 2019, the VCGLR wrote to Crown requesting an explanation as to what consideration it gave to the 'adverse media reports' (alleging criminal activity) and a Patron Risk Rating report as 'significant' when deciding to engage an individual as a Junket Operator.</p> <p>Crown responded to the requests as required.</p> <p>On 2 October 2020, the VCGLR issued Crown with a Notice to Show Cause for contravention of s 121 of the Casino Control Act for alleged failures to comply with cl 2.5.1 of the Junket ICS.</p> <p>On 30 October 2020, Crown responded to the Notice.</p> <p>On 17 November 2020, the VCGLR again wrote to Crown, amending its Notice to Show Cause to add a further breach of cl 2.5.1 relating to the Junket Operator of the Suncity</p>		August 2019	<p>As of November 2019, a full suite of changes to Crown's junket processes were (or were being) implemented, including:</p> <ul style="list-style-type: none"> • the former Deputy Commissioner of the New South Wales Police, will assist Crown in developing relationships and information protocols with law enforcement agencies, • A review of key business procedures, including the junket approvals process. • Crown initiated a proposal to establish the Australian Casino Industry Group. Crown's objective is to facilitate the sharing of intelligence in relation to specific individuals to ensure that integrity, money laundering, and terrorism financing risks are appropriately addressed. • Crown engaged Deloitte to conduct a review of

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		<p>Junket. On 4 December 2020, Crown provided a response to the VCGLR.</p> <p>On 23 December 2020, the VCGLR wrote to Crown providing Notice of a Disciplinary Action Hearing, to be held on 21 January 2021 at their Richmond offices.</p>			<p>Crown's decision-making processes as to junket operators and the operation of the Person of Interest Committee. On 18 August 2020, a draft of the Deloitte Review was presented to the Crown Resorts Board. The Crown Resorts Board resolved to adopt each of its 20 recommendations which Crown is in the process of implementing.</p> <ul style="list-style-type: none"> • The Board resolved to suspend all junket relationships. • An organisational restructure that would result in the creation of a specific Financial Crime Department within Crown (incorporating AML and Compliance) separated from the operational structure. This department would be provided with ultimate power to approve new junket operator relationships and terminate

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					<p>existing relationships with junket operators (and, for that matter, junket agents and premium players).</p> <ul style="list-style-type: none"> On or about 11 August 2020, Berkeley Research Group (Hong Kong) Ltd was engaged to undertake an investigation of certain persons connected with existing junkets. <p>In August 2020, the Crown Resorts Board decided to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020.</p> <p>See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.</p>
70	<p><i>Casino Control Act 1991 (Vic), s 60(2)(c)</i></p> <p>Roulette Rules 5.3 (V)</p>	<p>On 3 October 2019, Crown received a letter dated 9 September 2019 from the VCGLR.</p> <p>The VCGLR requested an explanation as to why the Dealer on AR3112 disregarded Roulette Rule 5.3 on two occasions by not</p>	<p>The employee had received appropriate disciplinary action, including placing the Dealer on a performance improvement plan and additional training.</p>	October 2019	

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		<p>signalling or announcing 'no more bets' whilst the ball was still rotating around the wheel.</p> <p>On 9 October 2019, Crown responded to the VCGLR, accepting that the dealer had failed to adhere to the Rules.</p> <p>The VCGLR has closed this matter with a Notice of Non-Compliance.</p>			
71	<p><i>Casino Control Act 1991 (Vic), ss 60 and 126</i></p> <p>(V)</p>	<p>On 25 June 2019, Crown made a submission to the VCGLR to approve updates to Spreadbet Roulette (an electronic side wager system that runs off Cammegh screens linked to Cammegh Roulette Wheels).</p> <p>During this process, it was identified that the system was proposed to run off Cammegh Mercury 360 and Cammegh Mercury 2 Roulette Wheels. However, Crown was unable to locate a prior specific approval for Mercury 2. It was revealed that the term Mercury was used interchangeably by Cammegh to refer to both the Mercury 360 and Mercury 2 products — only minor differences existed between both wheels, neither of which impacted the running of the game (primarily, components which consisted of sensors used to detect the numbers and portray them on a display screen). This was communicated to the VCGLR.</p>	<p>In July 2019, Crown replaced its Mercury 2 wheels with Mercury 360 wheels, which it was scheduled to do as the Mercury 2 wheels are no longer manufactured.</p> <p>The VCGLR has made subsequent enquiries regarding the use of side bets on different types of Cammegh wheels which Crown is responding to.</p> <p>As at 31 October 2019, all Roulette wheels on the gaming floor are Mercury 360, with the exception of eight wheels which are known as the Mercury Special Wheels (covered by an approval) located in the Teak Room.</p> <p>The VCGLR further requested additional information regarding the use of Cammegh Gaming Equipment, to which Crown had responded.</p>	July 2019	

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72	<i>Casino Control Act 1991 (Vic), s 81AAC</i>	<p>On 15 November 2019, a VCGLR Inspector requested footage and statements relating to three males regarding an Responsible Service of Alcohol matter.</p> <p>Statements were requested from a Table Games Area Manager, Dealer and two Food & Beverage Attendants along with any details Crown may hold of the three males.</p> <p>The men were observed in the vicinity of the Jackpot Bar, Pits 4, 6 & 7 and EGM F2701 acting in a loud manner that drew the VCGLR's attention to RSA concerns.</p>		November 2019	
73	<i>Gambling Regulation Act 2003 (Vic), s 3.5.43AA(2)</i> <i>Gambling Regulation 2015 (Vic), r 30</i>	<p>On 13 January 2020, the VCGLR wrote to Crown seeking an explanation as to why the publication of a gaming machine advertisement was permitted to be displayed outside of the casino boundary contrary to the <i>Gaming Regulation Act</i>.</p> <p>The VCGLR noted that on 30 December 2019, a pillar located outside of the Village entry to the Level One Sports Casino displayed an electronic advertisement '1c&2c Pokies'.</p> <p>On 11 February 2020, Crown responded to the letter noting that it is permissible for</p>		January 2020	

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		<p>directional signage within the complex to be displayed under the Gambling Regulations r 30(f).</p> <p>The VCGLR accepted Crown's position and verbally advised that the matter was closed.</p>			
74	<i>Gambling Regulation Act 2003 (Vic)</i> , s 3.5.34AA	<p>On 3 December 2019, Crown Marketing became aware that gaming machine material may have been sent to up to 101 Table Games members who were Player Activity Statement (PAS) N/A or PAS Blank members, due to a handling error at the external printer.</p> <p>PAS N/A or PAS Blank members are categories of members who have not expressly agreed to receive gaming machine advertising as required by the <i>Gambling Regulation Act</i>.</p>	<p>As at 12 December 2019, Crown was unable to ascertain if any of the possible 101 members were sent the gaming machine information and no complaints were received.</p> <p>However, Marketing confirmed that all relevant members had signed 'yes' to receiving 'gaming' information based on their flag in the system, but were not marked as 'PAS In', in the system.</p>	December 2019	The external contracted printing agency altered its processes to ensure that a recurrence is avoided, including a double verification process.
75	<i>Casino Control Act 1991 (Vic)</i> ss 62, 64	<p>On 15 November 2019, Regulatory and Compliance became aware of a discrepancy in a current approval for SATG Roulette — two Roulette wheels were incorrectly specified for use. This appeared to be an oversight by several parties (including Sci-Games, BMM (ATF) and Crown).</p>	<p>On 22 November 2019, a meeting was held with relevant Table Games and IT stakeholders.</p> <p>Crown contacted the VCGLR and BMM and approval was received on 10 December 2019 for the relevant products (SATG and FATG Fusion Hybrid 1.0 software). The approval now specifies the correct Roulette wheels that are suitable for use.</p>	November 2019	<p>Table Games staff were reminded to ensure that future submissions are reviewed thoroughly and that each component on a BMM (ATF) report is checked for accuracy. Co-signoff by IT and Compliance is required prior to submission.</p> <p>Discussions were held with BMM (ATF), Sci-Games and</p>

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					<p>the VCGLR to clarify what level of detail is required to be in Crown's submissions.</p> <p>Compliance held meetings with Table Games to strengthen processes around knowledge of approved gaming equipment, including citing relevant VCGLR approval numbers on Table Movement forms, updating Maximo (Asset Management System) to provide more detail around approved gaming equipment and labelling of equipment such that it is clearly identifiable.</p>
76	<i>Casino Control Act 1991 (Vic), s 60(2)(c)</i>	<p>On 14 November 2019, the VCGLR wrote to Crown requesting an explanation as to why a patron was permitted by Table Games staff to move a wager from Banker to Player after the Player cards had been exposed; and during the same coup, the patron was permitted to remove his losing wager.</p> <p>On 14 January 2021, the VCGLR provided a Notice of Non-Compliance and closed the matter with no further action.</p>	<p>Crown believes the hand was a Dummy Coup and the course of action taken by the staff aligned with the Rules.</p> <p>Crown did not consider that a breach had occurred.</p>	No date specified	

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77	<i>Casino Control Act 1991 (Vic), s 60</i>	<p>On 14 November 2019, the VCGLR emailed Crown regarding a patron complaint on SATG Baccarat from 4 November 2019.</p> <p>The patron alleged that the Dealer had been using the cut card incorrectly, contrary to the Rules of Semi-Automated Table Games, which requires the Dealer to cut approximately 20 cards from the back.</p>	Crown investigated the matter, including reviewing footage and obtaining an account from the Table Games Area Manager and formed the view that no breach had occurred.	November 2019	Regardless of there being no breach, additional training was provided to the Table Games Area Manager around the differences between cutting the cards on Blackjack (1.5 decks) and Rapid Baccarat (20 cards).
78	<i>Casino Control Act 1991 (Vic), s 121</i>	<p>On 14 November 2019, the VCGLR wrote to Crown alleging a breach of s 121(4) of the <i>Casino Control Act</i> as the names of three Key Players were not listed on a junket program. The three players had received cash outs for various amounts.</p> <p>On 9 December 2019, Crown responded to the VCGLR submitting that no breach had occurred for the above reasons.</p> <p>On 16 June 2020, the VCGLR verbally notified Crown that it accepted Crown's submission and the matter was closed.</p>	<p>The three players were listed on a 'Junket Chip Cash-Outs' document (an internal document used by the Cage to monitor the overall cash paid from the Operator's deposit account against the outstanding Cheque Cashing Facility limit).</p> <p>All three players were playing on a Hong Kong Dollar Program and, therefore, were rated under a separate junket.</p> <p>Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020.</p>	November 2019	

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			See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.		
79	<i>Casino Control Act 1991 (Vic), s 56(1)(c)</i>	On 5 March 2020, Compliance received notification of a Licenced Special Employee Termination with a cessation date of 14 December 2019, although the requirement under legislation is to report terminations to the VCGLR within a week.	VCGLR was notified of the breach and reporting obligations were met in March 2020.	14 December 2019	Finance was reminded in writing of Crown's reporting obligation under the <i>Casino Control Act</i> .
80	<i>Casino Control Act 1991 (Vic), s 62AB</i>	Gaming Machines identified (during internal testing) access to an option in the Audit Menu to change the Bank Note Acceptor settings to accept \$100 notes without breaking logic or applying a power cycle to verify the change. This matter relates to the Scientific Games/Bally product on 265 machines. The Audit Menu is currently only accessible to authorised staff via a secure key.	Crown removed the ability for 70 EGMs, which were unable to be updated, to accept \$100 notes.	March 2020	Crown was working with Scientific Games to develop a new software base for the remaining product. The update will be applied once approved and tested in-house. A real-time system was developed to monitor \$100 note insertions on these machines as an additional safeguard. As the majority of STG staff were stood down as a result of the COVID-19 pandemic, there had been a delay in progressing this matter.

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81	<p><i>Casino Control Act 1991 (Vic), s 121</i></p> <p>Junket and Premium Player Programs Internal Control Statement, s 4</p>	<p>On 13 February 2020, the VCGLR wrote to Crown seeking an explanation on two anomalies found during a Premium Player audit for an individual.</p> <p>The two anomalies were discrepancies regarding turnover and expenses in the Premium Player Settlement Sheet and Player Rating Transaction Report.</p> <p>On 12 March 2020, Crown responded to the letter, explaining that: (i) no calculation errors have occurred; and (ii) the individual's Premium Player Program Agreement allows for a Complimentary Allowance of .10% of the Program's total turnover.</p> <p>The VCGLR accepted Crown's position and closed the matter on 14 January 2021.</p>	<p>As a consequence of the individual's accommodation expenditure, he was asked to contribute \$2,000 towards his expenses, which he did.</p>	13 February 2020	
82	<p><i>Casino Control Act 1991 (Vic), s 121</i></p> <p>Cheque Cashing and Credit Facilities Internal Control Statement</p> <p>Current SOPs for Cheque Cashing and Credit Facilities</p>	<p>On 13 February 2020, the VCGLR wrote to Crown alleging a breach of cl 2.1 of the Cheque Cashing and Credit Facilities Internal Control Statement. The VCGLR noted anomalies found during a random selected Junket Operator audit for an individual.</p> <ul style="list-style-type: none"> There was no application for a Cheque Cashing Facility or Credit Facility Limit Change to increase the credit facility from \$3M to \$5M, required by s 2.4 of the 	<p>On 24 March 2020, Crown responded to the letter noting that Crown was not in breach of the Cheque Cashing and Credit Facilities ICS or SOP on the grounds that the subject individual was approved for \$7.5M, with the approval dated September 2016.</p> <p>The individual's program commenced with \$3M Front Money, but was approved for a This Trip Only of up to \$5M (the \$3M met the Front Money requirements even though</p>	13 February 2020	The staff member who entered the incorrect authoriser's name was counselled.

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		<p>Current SOPs for Cheque Cashing and Credit Facilities.</p> <ul style="list-style-type: none"> • There was no correspondence between with respect to the credit limit change. • The Junket Program Agreement recorded front money of \$3M. However, four days earlier on 18 December 2019, Authorisers seemingly approved the credit limit change. The Junket Program Agreement did not record front money of \$5M. • The Cheque Cashing Maintenance report for the credit limit increase was improperly authorised by a person without authority. • There was no correspondence between Credit Control and the Authorisers with respect to the credit limit increase. <p>Crown was verbally notified by the VCGLR on 10 July 2020 that it had accepted Crown's position and the matter had been closed.</p>	<p>\$5M was drawn at the time, therefore Crown met the Front Money requirements).</p> <p>Crown confirmed the authorisers and that a team member within Crown's Cage had entered the incorrect authoriser into SYCO.</p> <p>Credit Control advised the Cage the following day of the entry error. The Maintenance Report still reflects the error as it cannot be amended in SYCO; it could only be recorded manually on the report for future reference (which has since occurred). No credit limit increase has occurred in this instance.</p> <p>Crown made a series of enhancements to its junket due diligence processes from mid-2017 onwards. These improvements were superseded by the decision in August 2020 by the Crown Resorts Board to temporarily suspend Crown Melbourne's dealings with junkets. This suspension was made permanent by the Crown Resorts Board on 17 November 2020.</p> <p>See further the courses of action taken by Crown at Rows 14-16 in Schedule 2, Annexure 1.</p>		
83	<i>Casino Control Act 1991 (Vic)</i>	On 13 November 2020, the VCGLR issued a s 26 Notice, seeking information in relation to evidence provided to the ILGA Inquiry,	Crown provided the information as requested on 23 November 2020, and	January – February 2018	

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		<p>specifically an explanation of the 'incidents' referred to that occurred on 5 January 2018 and 9 February 2018 in the Melbourne Casino Sun City room involving 'large amounts of cash at the Sun City desk'.</p> <p>The request also concerned an explanation regarding the current status of a disciplinary investigation concerning a staff member.</p>	<p>noted the staff member had been fully stood down.</p>		
84	<i>Casino Control Act 1991 (Vic), s 123</i>	<p>On 30 December 2020, the VCGLR wrote to Crown requesting clarification on a recent notification from Crown to update the Approved Bank Account List.</p> <p>The notification from Crown included correcting previous advice Crown had provided, of the closure of a bank account in Thailand. Crown advised that an account had been closed, but in fact it had remained open at the request of an accountant used by Crown in Thailand.</p> <p>The VCGLR requested information on how the error had occurred and on other matters such as account usage, including what 'office use' related to and why several accounts were no longer allocated a 'patron use' status.</p> <p>The VCGLR has now approved the accounts.</p>	<p>On 18 January 2021, Crown responded to the letter, providing information as requested (including that the accounts were no longer to be used by patrons, that 'office use' was used in its general sense (stationary etc.)) and that the error occurred as information had not been passed on when received from the accountant (as a result of human error).</p>	December 2020	<p>Stakeholders have been emailed a reminder to provide accurate and timely advice on bank accounts held in Victoria or overseas.</p>