



Crown Responsible Gaming Best Practice Recommendations May 2021

As Crown Resorts General Managers for Responsible Gaming, we are currently implementing a strategy informed by academic, clinical and operational expertise to position Crown Resorts as a leading organisation in Responsible Gaming.

Crown is currently undertaking the most significant organisational and cultural transition since the company's foundation. It is our vision that Crown will emerge as a more robust, accountable, transparent and highly-functioning organisation that is a truly fit and proper entity to hold casino licences in each of the jurisdictions we operate.

The purpose of this paper is to provide further opportunities to implement changes that will demonstrate Crown's commitment to achieving these goals.

Crown Responsible Gaming – Our Vision and Mission

- Crown Substantial Culture Change – Nothing else can be achieved without it.
- To develop and operate a cross-property Responsible Gaming (RG) plan that takes the best initiatives from each property and applies these across the RG business.
- To operate RG in a transparent and accountable manner. To promote and advocate for the good things we do to mitigate risk and minimise harm.
- Managing the culture shift of Crown Management and staff to appreciate equally, the value the gaming profit centres of the organisation with the licence-retention side of the business.

Crown Responsible Gaming – Next Stage Recommendations - Immediate

1. **Play Period Trial & Evaluation.** It is recommended that the maximum play period across any 24-hour cycle be further reduced from the current 18 hours to a new limit of 12 hours for domestic and interstate customers. For international customers, the maximum play period remains at 18 hours per day/night for a maximum of 7 consecutive days when at such time they also are limited to 12 hours per 24-hour cycle. Player time period alerts will be adjusted to touchpoints of 8, 10 and 12 hours. Successful implementation must include:

- A. **Effective marketing and promotion of the move to 12 hours maximum**
 - B. **A two-month lead-in timeframe**
 - C. **A research program of evaluation**
 - D. **Implemented based on a trial**
2. **Mandatory Carded Play.** All casino play is mandated to require a Crown Membership/Rewards card. Un-carded play to cease across all three properties as soon as is practicable. Introduction of “Track Your Play” connecting cards to a dedicated app to support and encourage customer gaming self-awareness.
 3. **Cashless Gaming across all Crown properties.** Consideration to be given to effective and secure delivery of a cashless gaming experience whereby player funds are loaded on to membership cards necessitating carded play. This will allow Crown to reliably and accurately monitor customer visitation, time-on-site and spend.
 4. **Crown Loyalty Program.** Major overhaul of the Loyalty System is required to shift reward away from gaming customers and to re-position customer incentive across ALL resort entertainment offerings. VIP Gaming customer gifts and experiences to also be broadened across the resort’s customer-base. An elimination of high-end discretionary gifting outside the structured tiers and promoted rewards is also recommended. Responsible Gaming GMs to undertake **random audits** of Crown customers qualifying for a loyalty tier ascension.
 5. **Elimination of Gaming Host Turnover-based Commission/Bonus Rewards.** In whatever form there may still exist bonus payment incentives among Crown management/staff to encourage from our customers, higher stakes and/or longer play periods, these must cease.
 6. **Removal of Stipulated/Nominated Time Periods for Self-Excluding Customers.** Given that self-exclusions remain in place until revocation is applied for, such nomination of time is pointless and potentially unhelpful as it can set up an expectation of re-admittance before it is safe for the participant to re-engage with Crown’s gambling products and facilities. Instead, self-excluding customers can be informed of a minimum self-ban of 12 months with no automatic end date prior to any subsequent revocation application.
 7. **Responsible Gaming Welfare WOLS.** Involuntary bans placed upon customers displaying ongoing concerning gambling behaviours must be for a minimum of 12 months. Revocation applications will only be considered after these minimum periods.

Crown Responsible Gaming – Next Stage Recommendations - Secondary

- 8. Mandatory Gaming Floor Entry Registration.** Requirement for all customers to register their entry/exit to Gaming and VIP areas by way of Scantek or other application which confirms customer is not excluded. Registration additionally allows for live monitoring of those onsite for non-gaming related visitation.

- 9. Integrated IT Solution.** Fast track transition to iTrak in CM and alignment of program applications in CP and CS to mitigate risk and non-identification of self-excluded, RG involuntary excluded and RG persons of interest (including Security exclusions) cross property. Current process, due to operating different customer incident management systems or versions, requires each property to manually upload exclusions to their respective data base. This is labour intensive, subject to processing delays and potential human error. Additionally, an enterprise solution is required to allow integration of all IT applications used by RG (Itrak, SEER, SYCO, LUI, MS Teams, Webex, IGT Advantage... others) providing an all-inclusive overview of a customer profile at one centre location. This IT solution must have mobile capabilities to allow RG and Gaming (broader BUs?) to report RG related concerns/incidents through the application without requirement for RG to replicate reports into a separate application (management system).

- 10. National Gambling Exclusion Register.** Crown to champion introduction of the National Gambling Exclusion Register (land-based Casinos) for RG related exclusions (voluntary and involuntary) and individuals identified as being undesirable/not suitable based on Security/Surveillance/AML nationally agreed criteria.

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