

Reception Horne (VICMIN)

From: Gabriella Dawson <[REDACTED]>
Sent: Friday, 2 July 2021 1:40 PM
To: Reception Horne (VICMIN)
Subject: FW: Private & Confidential | Commercial in confidence | Crown
Attachments: Letter to The Honourable Melissa Horne (2 July 2021) (8844777).pdf; Attachment A - Report on Remediation Plan Reforms dated 27 June 2021.pdf; Attachment B - ASX announcement and ILGA news release.pdf; Attachment C - Appointment of Kroll - executed by ILGA.pdf

Categories: Gaming & Liquor

From: Nicole Flint <[REDACTED]> **On Behalf Of** Leon Zwier
Sent: Friday, 2 July 2021 1:11 PM
To: Melissa Horne <[REDACTED]>
Subject: Private & Confidential | Commercial in confidence | Crown

Please see **attached** letter and enclosures.

Leon Zwier | Partner

Arnold Bloch Leibler
 Level 21, 333 Collins Street, Melbourne Victoria 3000

[REDACTED] Vcard

Arnold Bloch Leibler
 Lawyers and Advisors



Arnold Bloch Leibler supports Aboriginal and Torres Strait Islander recognition and the removal of racially discriminatory provisions in the Constitution.

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2 July 2021

By Email
Private & Confidential
Commercial in confidence

File No. 011916235

Contact
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Genevieve Pope
Claire Southwell
Luise Squire

Dear Minister Horne

I act for the directors of Crown Resorts Limited and the non-executive Directors of Crown Melbourne (collectively **Crown**).

Set out below are my instructions.

Executive Summary

The purpose of this letter is to formally seek a meeting with you and other members of your government to discuss the affairs of Crown on a commercial in confidence basis. Crown has undergone a material reform program which is continuing and a board refresh. Further reform will be required, taking particular note of matters that have arisen in the Victorian Royal Commission. Crown's new CEO is leading further management change. Additional directors will also be appointed to the board. The Chair wishes to discuss with you further steps Crown may be willing to take to establish a better and more productive working relationship with the State and provide the State with additional safeguards similar to those Crown Resorts has provided in NSW. Finally, we also wish to discuss the counterfactuals that may arise after the Victorian Commissioner delivers his recommendations to your government.

Background

- On 1 February 2021, an inquiry conducted by the Hon. Patricia Bergin SC for the NSW Independent Liquor and Gaming Authority (**ILGA**) concluded that Crown NSW was not a suitable person to hold a gaming licence under NSW law (**the Bergin Report**). The Bergin Report identified a road map to suitability for Crown NSW.
- On 22 February 2021, the Government published the terms of the Royal Commission it established into the suitability of Crown Melbourne to continue to hold the casino licence under the *Casino Control Act 1991* (**CCA**) and appointed Ray Finkelstein AO QC as the Commissioner and Chairperson (**Commission**).
- Crown accepts that there are a number of serious and important issues which are relevant to the assessment of suitability to hold a casino licence in Victoria.

- 4 Crown will submit to the Commission that it is currently in the public interest for the reformed Crown to continue to hold the casino licence in Victoria and it is currently a suitable person to do so because of the material changes to the board, management, and Crown's culture, the roll out of a broad and far-ranging reform program and as a consequence of the truth telling about the Packer influenced Old Crown in this Commission and the Bergin Inquiry.

Interim Executive Chair of Crown

- 5 On 24 January 2020, Helen Coonan was appointed Chair of Crown Resorts having first been appointed to the board on 2 December 2011. (She is now the Interim Executive Chair of Crown Resorts following the resignation of the former CEO on 15 February 2021). Helen Coonan has been criticised because of her extended tenure on the board.
- 6 The Bergin Report made the following observations concerning Helen Coonan:
- (a) 'Ms Coonan has demonstrated the qualities that are necessary to have taken her into the leadership role of Crown and is exquisitely aware of the depths of the problems within the company of which she is now Chairman' (Vol 2, 361 at [51]);
 - (b) 'Ms Coonan accepted the serious corporate failings of Crown and notwithstanding those corporate failings is willing to, as she put it, stay the course. That commitment in the circumstances of the evidence that was exposed during the course of this Inquiry is no small matter. The burden of reformation will be great' (Vol 2, 365 at [66]);
 - (c) 'The review of the Chairman's evidence demonstrates that her character, honesty and integrity has not been and could not be called into question. The Authority would be justified in accepting any commitment or undertaking given personally and/or on behalf of Crown that may be proffered by the Chairman in respect of the future operations of Crown and/or the Licensee taking into account the other matters of significance to which reference is made elsewhere in the Report' (Vol 2, 365 at [67]);
 - (d) The Chairman was cognisant of the need for co-operation, obvious from her expression of regret referred to earlier in the Report. The Authority should regard this aspect of Ms Coonan's evidence as an indication that there is the real prospect that Crown will recalibrate its relationship with the Authority as one that is respectful and co-operative (Vol 2, 573 at [36]).
- 7 Helen Coonan would have preferred to step down from the Board of Crown Resorts, but after deliberation formed the view that it was in the best interests of Crown and its stakeholders for her to continue as the Chair. Helen Coonan also provided Commissioner Bergin with an assurance that she would see through the necessary remediation and she did not wish to recant from that assurance. Helen regards herself as charged with repopulating the new board and identifying her replacement.

Material Changes to the Boards of Crown

- 8 Since the Bergin Inquiry, Crown Resorts and Crown Melbourne have undergone material changes to the composition of their boards.
- 9 My clients were unable to effect some of these changes before the release of the Bergin Report.

- 10 The following directors of Crown Resorts resigned after the Bergin Report:

Former director	Date of resignation
Mike Johnston (Non-independent)	10 February 2021
Guy Jalland (Non-independent)	10 February 2021
Andrew Demetriou (CPH connected)	12 February 2021
Ken Barton (Executive director)	15 February 2021
Harold Mitchell (CPH connected)	22 February 2021
John Poynton (CPH connected)	1 March 2021
John Horvath (Independent)	14 April 2021

- 11 The following directors of Crown Melbourne resigned:

Former director	Date of resignation
Andrew Demetriou (CPH connected)	12 February 2021
Ken Barton	15 February 2021
John Horvath (Independent)	14 April 2021

- 12 The following directors have been appointed (or upon approval will be appointed) to Crown Resorts and Crown Melbourne after the Bergin Report.

Nigel Morrison
Bruce Carter

- 13 Nigel Morrison and Bruce Carter are both qualified directors with significant gaming experience.
- 14 The new board has also appointed Steve McCann, the former CEO and Managing Director of Lendlease as its new CEO. As the Government may know from interactions with him, Steve McCann has vast corporate experience and has been charged with responsibility to continue to make organisational changes and replace longer term executives and employees that fail to embrace the culture of Crown and abide by its revised practices and policies.
- 15 The Old Crown board was influenced by James Packer, even though he was not at all material times a member of the board. The Bergin Report explains the Packer influence. But Packer's influence has ended. The CPH influence of Crown Resorts has in effect been removed.
- 16 The culture of any organisation is set by its board and its key executives. The new board and executives are driving a different culture from the previous one.

The Crown Reform Package

- 17 Attachment A to this letter is a report prepared by Allens, Crown's lawyers, of the Crown Reform package.

CPH and Packer Influence

- 18 CPH currently owns 37% of the issued share capital of Crown Resorts.
- 19 CPH does not control Crown. CPH has agreed with ILGA to curtail its powers as a shareholder of Crown Resorts. Attachment B to this letter is a copy of Crown's ASX announcement and the ILGA news release relating to the agreement between ILGA and CPH.

- 20 The board of Crown accepts that if CPH acts contrary to the terms of the agreement with ILGA and, for example, CPH exercises its powers to control the board of Crown, Crown would not be suitable to hold a Casino licence in Victoria.

Commission Hearings

- 21 On 9 March 2021, the Commission requested that Old Crown identify any breaches or possible breaches of, amongst other laws, the CCA, the *Casino (Management Agreement) Act 1993*, the *Anti-money laundering and Counter-Terrorism Financing Act 2006* and the *Financial Transaction Reports Act 1988 (RFI 002)*.
- 22 Crown has sent six responses to RFI 002 on 24 March 2021, 21 April 2021, 19 May 2021, 18 June 2021, 24 June 2021 and 29 June 2021. It is likely further responses will be provided as further information comes to light.
- 23 Crown disclosed to the Commission Old Crown's use of China UnionPay debit and credit cards to facilitate gambling of over \$160 million in the period 2012 to 2016 in breach of section 68 of the CCA.
- 24 Crown intended to disclose the underpayment of the State Casino Tax, but as a result of the board misunderstanding the seriousness of the issues and an inadvertent oversight by its lawyers to look into them, it initially failed to do so. Crown has now appointed Queens Counsel to advise on what amount of State Casino Tax (including interest) has been underpaid. Crown's board has sought advice as to whether Old Crown misled the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**), whether that conduct breached section 120 of the CCA and if so how. The results of these legal investigations will be disclosed to the Commission because Legal Professional Privilege is abrogated by the *Inquiries Act 2014*.
- 25 Crown's preliminary view is that it may have underpaid Casino Tax (including interest) by an amount less than \$20 million. It is waiting on further advice and verification of the salient facts by its executives and employees before it can reach a concluded view. However, as soon as Crown reaches a concluded view of the amount it believes it has underpaid it will pay that amount together with interest to the State on a "without prejudice" and "no admissions" basis and then seek to engage with the VCGLR and the State to resolve any differences about the amount that ought to be paid. Crown also accepts that the VCGLR may have contrary advice to that of Crown's. If those differences cannot be resolved by negotiation, then Crown will propose an alternate dispute resolution process so that the differences can be resolved quickly and cost effectively. Crown has also informed the VCGLR of this proposal.
- 26 The board of Crown is fully cooperating with the Commission.
- 27 The board also accepts that the Commission is playing a key role in shedding light on prior failures of culture, systems and people and thereby helping the board to establish a new and better culture and improved practices, policies and procedures to ensure these prior failings cannot reoccur.

Commission Adverse Findings against Executives Employees

- 28 The board of Crown acknowledges that the Commissioner may make adverse finding against Crown's current executives and employees. The board of Crown will give serious consideration to terminating the services of any executives or employees against whom material adverse findings are made by the Commissioner, as soon as practicable having regard to its continuing obligations as a licensee and a public company.

Current Issues

- 29 Crown is under extreme pressure. It is currently the subject of:
- (a) the Victorian Commission of Inquiry;
 - (b) the Western Australian Commission of Inquiry;
 - (c) an ILGA review in relation to future suitability in New South Wales;
 - (d) constant monitoring by an ILGA appointed Monitor (Kroll);
 - (e) anticipated VCGLR regulatory investigation of disclosed breaches of the CCA;
 - (f) class proceedings;
 - (g) AUSTRAC investigation in relation to breaches of the AML/CTF legislation;
 - (h) potential change of control transactions; and
 - (i) intermittent partial or full shutdowns due to Covid-19 restrictions which materially impact cashflow.

Breach of Lending Covenants

- 30 Set out below is a high-level summary of some of the risks that Crown faces in relation to its financiers.

- 31 Under the Common Terms Deed Poll (CTDP) which governs the terms of Crown's bilateral bank debt (facilities totalling \$560 million, of which c.\$420 million is currently drawn) and letters of credit (c.\$99 million currently issued),

[REDACTED]

- 32 [REDACTED] under Crown's Euro Medium Term Note (EMTN) (now c.\$180 million).

- 33 [REDACTED] may also cause credit ratings agencies (e.g., Standard & Poor's, Fitch) to downgrade the rating of Crown's EMTN notes to non-investment grade and trigger a put option under Crown's EMTN which, if exercised, would require Crown to redeem the EMTN notes (now c.\$180 million plus a significant make-whole

[REDACTED]

- 34

[REDACTED]

[REDACTED]

- 35 If there is an EOD it may have severe consequences for Crown and all its stakeholders. This will impact on Crown's shareholders, employees, unions, trade creditors, patrons, the hotel precinct and the Melbourne tourist industry.

- 36 Crown Melbourne is the State's largest single site private employer. An EOD may result in loss of employment or severe threat of loss of employment.
- 37 Crown directly and indirectly employs 11,597 people, over 11,000 of whom are below management level and almost 5,000 of whom are direct EA covered employees.
- 38 Most of the employees are disconnected from, and have not directly or indirectly, contributed to the failures of Old Crown and through COVID 19 they have suffered significant uncertainties. They will suffer greater uncertainties if there is an EOD.
- 39 An EOD may also provide potential overseas suitors an opportunity to take advantage of the situation.
- 40 It is not in the public interest for Crown to fail.

Change of Control Transaction

- 41 Crown has been the subject of a number of indicative non-binding unsolicited proposals relating to the ownership of Crown from The Star, Oaktree Capital and Blackstone Group. Blackstone Group has specified that a condition of its offer is that Crown's Victorian casino licence is not suspended. It is expected that any suitor will impose a similar condition. It is also evident that a change in control through an acquisition of shares will not of itself address the issue of suitability and accelerate the culture change underway.

Conclusion

- 42 The Crown Chair and I seek to meet with you urgently to discuss these issues and a proposal to put in place additional safeguards to further assure the State that Crown is different from Old Crown. The proposal we would like to discuss includes the appointment of a State Monitor to report to the State or VCGLR similarly to the way the NSW Monitor reports to ILGA.ⁱ

Yours sincerely



Leon Zwi
Partner

ⁱ See attachment C to this letter which is the engagement letter between Crown and Kroll dated 7 June 2021.



Remediation and Reform Program – 27 June 2021

1 Overview

The purpose of this briefing note is to provide a high level summary of Crown's remediation and reform program.

2 Remediation Plan

Various reform initiatives had been commenced by Crown in advance of the delivery of the Bergin Inquiry findings in February 2021 and some of these steps were referred to in the Inquiry's final report. Following the publication of the Bergin report, a formal remediation plan was developed in order to incorporate and track specific responses to the issues and suggestions it contained. The following is a summary of the reform action items that appear in that plan or which are otherwise relevant to the findings of the Bergin report:

- **Board and senior management refresh**
 - One of the ways in which Crown has sought to address concerns in relation to its culture and the influence of CPH was through a significant board and senior management refresh.
 - Eight directors left the Board between October 2020 and April 2021, namely Ken Barton (former CEO), Andrew Demetriou, John Alexander, Michael Johnston, Guy Jalland, John Poynton, Harold Mitchell and John Horvath.
 - A number of members of Crown's management team have left the organisation, including Barry Felstead and Joshua Preston.
 - Helen Coonan became Chairman in January 2021 and Executive Chairman following the departure of Ken Barton in February 2021..
 - Nigel Morrison and Bruce Carter were appointed to the Board in January and April 2021, pending probity approvals.
 - In late February 2021, Steve Blackburn commenced as the Chief Compliance and Financial Crime Officer. Mr Blackburn has substantial AML/CTF experience and expertise.
 - In early March 2021, Nick Weeks was appointed as the Executive General Manager, Transformation & Regulatory Response. He has carriage of the remediation plan, and is responsible for overseeing its implementation.
 - In June 2021, subject to probity approvals:
 - Tony Weston joined the group in the new role of Chief People and Culture Officer;
 - Betty Ivanoff commenced in the role of Group General Counsel; and
 - Steve McCann was appointed Group CEO.
- **Governance and organisational restructure**
 - Crown has implemented an organisational restructure, including elevated reporting lines for compliance and financial crime and risk, together with the implementation of a "three lines of defence" governance model.
 - Steps taken include the creation of a new Compliance and Financial Crime department and a group HR function, the separation of Risk and Internal Audit functions, the separation of the General Counsel and Company Secretary roles, the appointment of new legal advisers to Crown and a separate legal advisor to the Board.
 - The new Chief Compliance and Financial Crime Officer has a direct reporting line to the CEO and the Board. The new Chief Risk Officer has a direct reporting line to the CEO and Risk Management Committee (**RMC**), and the new Chief People and Culture Officer has a direct reporting line to the CEO, the People, Remuneration and Nomination Committee and the Occupational Health and Safety Committee.
 - Crown is also evaluating options to move to a more centralised governance model that would include, in particular, greater consolidation of the core governance, risk and compliance functions at the Crown Resorts level. Crown will engage with its regulators before it determines what changes may be possible and beneficial.
- **VIP business restructure, junkets and China**
 - Crown has ceased its dealings with junkets and no longer has a presence in China.
 - In January 2021, the Board approved the transition to an Australian based VIP model, with the closure of all remaining offshore offices and the cessation of employment of overseas domiciled sales team employees. A restructure of the operational functions has been completed and the VIP team will now operate solely as an Australian-based business development function.
- **Termination of agreements with CPH and additional controls over the influence of CPH**



- Crown has terminated all key CPH agreements and, as noted above, a number of directors have left the board, including all directors with connections to CPH.
- **AML/CTF reforms and Financial Crime and Compliance Change Program**
 - Crown has implemented significant reforms relating to financial crime risk management, including the roll-out of an enhanced AML/CTF Program, improved controls to prevent and detect money laundering through its bank accounts, cessation of junket relationships, the introduction of automated transaction monitoring and enhanced controls and mandatory limits relating to cash deposits at the casino.
 - As noted above, Crown has engaged a Chief Compliance and Financial Crime Officer who has substantial AML/CTF experience. Crown has also significantly increased its AML/CTF capability and capacity. The Financial Crime team has grown from 5 permanent employees on 1 January 2020 to 14 FTE, with further recruitment ongoing.
 - Crown has implemented additional AML/CTF training for Crown employees, board members and senior management.
 - In May 2021, the Board endorsed the Chief Compliance and Financial Crime Officer's Financial Crime and Compliance Change Program. The Change Program outlines how Crown will uplift its financial crime and compliance program, through significant further investment in people, systems, processes and training. The program will see the Financial Crime and Compliance team grow from a current full-time FTE of 55 to 111.
 - Crown has also implemented significant enhancements to its customer due diligence program, including the establishment of a committee that reviews high risk customers, and the implementation of a review of significant players by revenue.
 - In the fourth quarter of 2021, Crown will engage a third party consultancy firm to conduct an independent review of Crown's AML/CTF Program to assess the effectiveness of the program and its compliance with applicable AML/CTF regulation.
- **Deloitte Forensic Review of ML/TF activity in Crown's bank accounts**
 - Crown has engaged Deloitte to conduct a forensic review and controls assessment relating to the bank accounts into which Crown received deposits or permitted withdrawals by patrons (the **Forensic Review**). The Forensic Review is being undertaken to address certain recommendations in the Bergin report.
 - The Forensic Review covers bank accounts held by Crown Melbourne, Crown Perth, Crown Sydney and any other accounts associated with Crown's Australian casino operations used by patrons to deposit or withdraw funds. It includes the Riverbank and Southbank bank accounts referenced in the Bergin Inquiry.
 - **Phase 1** of the Review, which assessed the design and operating effectiveness of Crown's current patron bank account controls to prevent cash structuring and cuckoo smurfing, is complete. Deloitte's recommendations from the Phase 1 review are in the process of being implemented with the overwhelming majority due to be completed by October 2021.
 - **Phase 2** of the Review is ongoing and will confirm whether there are any transactional patterns or behaviours indicative of any money laundering typologies through historic or current patron bank accounts going back seven years from February 2021, including but not limited to structuring and cuckoo smurfing. Phase 2 is targeted for completion in August 2021.
 - **Phase 3** is also ongoing and will assess Crown's broader control framework and whether it appropriately mitigates the risk of any transactions similar to those identified in Phase 2 continuing to occur through the current Crown patron bank accounts. This includes assessing Crown's controls in relation to ongoing customer due diligence and enhanced customer due diligence. Phase 3 is targeted for completion at the end of July 2021.
 - The Forensic Review has recently been extended to assess transactions relating to a bank card payments practice in place at Crown Towers in Melbourne between 2012 and 2016.
- **Risk Management enhancements**
 - Crown has approved a new Risk and Compliance Culture Framework, following the review of risk policies and matrices. The Board has approved an updated Risk Appetite Statement and Risk Management Strategy.
 - A new role of Chief Risk Officer (**CRO**) was created and resourcing in the Risk team has been increased to seven staff who sit with the business and attend operational meetings.
 - Meetings of the RMC have increased from four to six meetings per annum, and reporting to the RMC has been enhanced. An Enterprise Risk Management system was introduced in Melbourne to collate risk information and facilitate reporting. A review of risk training is also scheduled to be completed in June 2021.



- Deloitte concluded a review of Crown's Risk Management Program in June 2019. Crown has now implemented the majority of Deloitte's recommendations.
- **Culture reforms**
 - Crown launched a set of new values in FY19. The values were incorporated into the Crown Code of Conduct issued in July 2020 and the in the Crown Risk and Compliance Culture Framework issued in March 2021.
 - A culture reform program was instigated in August 2020. An aspect of the program involves a review by Deloitte into Crown's organisational culture. Deloitte has concluded the first of three work phases. Deloitte is undertaking further fieldwork, including focus groups, internal and external interviews and observations to further explore key culture themes.
 - Crown is also in the process of developing revised remuneration structures under the guidance of the new Chief People and Culture Officer. As part of this, Crown will introduce values-based hurdles and mandatory compliance and risk key performance indicators. Mercer is also currently reviewing Crown's remuneration framework with feedback expected in July 2021.
 - The Board will oversee the cultural change to be driven by the new CEO and Chief People and Culture Officer.
- **Audit and assurance enhancements**
 - The Institute of Internal Auditors Australia assessed Crown's Internal Audit Department in October 2020. The review concluded that the Internal Audit Department is operating professionally and generally conforms with the Internal Audit Standards. This is the highest rating that can be achieved.
 - A new Group General Manager – Internal Audit was appointed and commenced at Crown on 10 May 2021.

3 Independent Monitor

Crown has agreed with ILGA that the implementation of the remediation plan and the design adequacy of the AML initiatives will be subject to review by an independent monitor. Kroll has been appointed to that role and has commenced work.

4 RG Reforms

Crown has also instigated significant Responsible Gaming enhancements, including:

- Reduced time limits on play for domestic players and international premium program players;
- Support for a State-wide exclusion register;
- Cessation of Bingo;
- Cessation of the Red Carpet Program;
- Consideration of cashless gaming;
- Enhanced controls on marketing activities, including review of all marketing and promotional activities by the responsible gaming function for compliance with RG obligations;
- Cessation of gaming vouchers to subscribe to Loyalty Program;
- Support for research into problem gambling behaviours, including potential causal link between aspects of Loyalty Program and gambling harm; and
- Employee incentive plans to consider RG implications.

Crown is also working with an Independent Advisory Panel (the **RGAP**) to implement the recommendations made in their report dated August 2020, which followed a detailed review of Crown's existing RG systems and practices. The majority of these recommendations have been implemented. The RGAP comprises three leading academic researchers in relation to problem gambling who were engaged by Crown to provide independent advice in relation to enhancing its RG systems and practices. Crown continues to consider whether further enhancements should be made as the Royal Commission hearings unfold.



**ASX/MEDIA RELEASE
FOR IMMEDIATE RELEASE
16 April 2021**

NSW ILGA ANNOUNCEMENT IN RELATION TO AGREEMENT WITH CPH

MELBOURNE: Crown Resorts Limited (ASX: CWN) (Crown) announced today that the New South Wales Independent Liquor and Gaming Authority (ILGA) has issued a news release stating that it has reached agreement with Consolidated Press Holdings Pty Limited (CPH) on a number of undertakings regarding Crown and its associates.

A copy of the news release made by ILGA is attached.

ENDS

This announcement was authorised for release by Crown's Disclosure Officer – Alan McGregor.

Investor and Analyst Enquiries – Matthew Young, Investor Relations, 03 9292 8848.

Media Enquiries – Natasha Stipanov, Corporate Affairs, 03 9292 8671.

COPIES OF RELEASES

Copies of previous media and ASX announcements issued by Crown are available on Crown's website at www.crownresorts.com.au

Friday 16 April 2021

ILGA STATEMENT ON AGREEMENT WITH CPH

The NSW Independent Liquor & Gaming Authority has reached agreement with James Packer's Consolidated Press Holdings (CPH) on a number of undertakings regarding Crown Resorts and its associates.

The agreement was reached following discussions between the regulator and CPH about the Bergin Report which raised significant concerns over the influence of CPH and Mr Packer, as the dominant shareholder of Crown, on the management and operation of Crown's Barangaroo casino.

Some of the key proposed undertakings by CPH include:

- not entering into any information sharing arrangements with Crown
- not initiating any discussions with Crown, other than through public forums, about Crown's businesses or operations
- not seeking to have its executive or nominee appointed to Crown's board, or requisition a meeting of Crown shareholders to seek the appointment of any person as a director of Crown, before October 2024
- not seeking any amendment to the Crown constitution which would affect the management or operation of Crown's businesses.

It is expected that the final form of the agreed undertakings will be recorded in an enforceable legal document between CPH and the Authority.

No further comment will be made on the agreement at this time.

ENDS