



VIP International – Operating Procedures
Malaysia – May 2019



VIP International | Operating Procedures – Malaysia



Contents

Contents	Slide
➤ Overview	3-4
➤ Outbound Sales	5
➤ Outbound Marketing	6
➤ Inbound Sales – Customers	7
➤ Inbound Sales – Junkets	8
➤ Other Procedures to be Complied With	9
➤ Prohibited Activities – within Malaysia	10
➤ Prohibited Activities - PRC Customers	11-12
➤ Money Changers	13
➤ Debt Collection	14-15
➤ Arranging Travel and the Private Jet	16-17
➤ Travel Approved Devices	18-19
➤ Privacy	20
➤ Anti-Bribery and Corruption & Gifts, Tips and Gratuities	21
➤ Definitions	22-23
➤ Compliance Executive Role	24
➤ Definitions Used Throughout the Presentation	25



Overview

The operating procedures of Crown's VIP International business were updated following a review of Crown's international business model.

The revised model that has been in operation since mid-2018 is a centralised model with the international gaming business operating from a central office in Hong Kong, with the support of a dedicated Compliance Executive as well as the Melbourne, Perth and London offices.

A change to the model for Malaysia has recently been approved whereby staff can live in Malaysia and have non gaming discussions and carry out non gaming activities in accordance with these updated Operating Procedures specific to Malaysia.

To support the operating model, staff have been trained in the processes and procedures and will continue to be trained, on an ongoing basis.

In that respect, approved scheduled training, ongoing reviews of these operating procedures and a documented audit program will support compliance and operational outcomes.



Overview

Main points to remember:

- All meetings (within Malaysia) must be attended by at least **two** Crown staff members
- Meetings can only occur with targeted high net worth individuals but **not** ethnic Malays
- Staff can live in Malaysia and have non gaming discussions and carry out non gaming related activities in Malaysia
- Staff in Malaysia are PROHIBITED from having any gaming related discussions or undertaking gaming related activities whilst in Malaysia
- Travel to the PRC on business is prohibited
- Outbound sales, marketing activities or initiating contact with PRC Customers (and ethnic Malays) is prohibited
 - * except under specific circumstances (for PRC customers only) listed in slide 5
- Gaming related discussions may only occur in/from Australia, London or Hong Kong
- Only discuss Crown's resorts and facilities (non-Gaming) outside of Australia, London or Hong Kong
- Gaming related data must not be stored on any device outside of Australia, London or Hong Kong (note: this does not include recording information in SalesForce)
- All travel for customers must be arranged to Australia (including flights, accommodation and visas) from the Melbourne office
- All travel for customers to London must be arranged through an approved travel agent or the Melbourne office
- All contact, regardless of type or importance must be logged in Salesforce within 24 hours

VIP International | Operating Procedures - Malaysia

Outbound Sales [discussions relating to program terms, credit, travel, flights and accommodation]



Outbound sales contact with customers and potential customers **except any PRC Customers and ethnic Malays*** can occur in accordance with the following table: (log all contact in Salesforce within 24 hours)

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Crown facilities and events (non-gaming)	✓	✓	✓	✓
Terms of Play	✓	✓	✓	✗
Repayment of Debts	✓	✓	✓	✗
Terms of Credit	✓	✗	✓	✗
Terms of CCF	✓	✓	✓	✗
Travel preferences – discussion only	✓	✓	✓	✓
Arrangement of travel, visas and accommodation	✓	✗	✗	✗

*Outbound calls (from Australia only) can be made into PRC by non sales and non travelling staff. The customer will then be requested to call the relevant Sales person in Hong Kong.

VIP International | Operating Procedures - Malaysia



Outbound Marketing [sending / distributing promotional materials in any format]

Outbound marketing contact with customers and potential customers **except any PRC Customers and ethnic Malays** can occur in accordance with the following table: (log all contact in Salesforce within 24 hours)

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Crown facilities (non-gaming)	✓	✓	✓	✓
Crown events (non-gaming)	✓	✓	✓	✓
Crown brochures (promoting non-gaming)	✓	✓	✓	✓
Electronic Communication in any form e.g. emails, evites, gaming offers or specific events - containing images of gaming or gaming terminology	✓	✓	✓ *	⊘
Sales App	✓	✓	✓	⊘
Electronic contact (messaging etc.) containing links to Crown webpages (gaming images)	✓	✓	✓	⊘

* Electronic communications can be sent by admin (non sales) staff within Hong Kong

6

VIP International | Operating Procedures - Malaysia



Inbound Sales [discussions relating to program terms, credit, travel, flights and accommodation]

Inbound sales contact with customers and potential customers **except any PRC Customers and ethnic Malays** can occur in accordance with the following table: (log all contact in Salesforce within 24 hours)

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Crown facilities and events (non-gaming)	✓	✓	✓	✓
Terms of Play	✓	✓	✓	✗
Repayment of Debts	✓	✓	✓	✗
Terms of Credit	✓	✗	✓	✗
Terms of CCF	✓	✓	✓	✗
Travel preferences – discussion only	✓	✓	✓	✓
Arrangement of travel, visas and accommodation	✓	✗	✗	✗

VIP International | Operating Procedures - Malaysia



Inbound Sales [discussions relating to program terms, credit, travel, flights and accommodation]

Inbound sales contact with potential non-DICJ/Crown Approved Junket Operators **except any PRC Customers and Ethnic Malays** can occur in accordance with the following table: (log all contact in Salesforce within 24 hours)

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Crown facilities and events (non-gaming)	✓	✓	✓	✓
Gaming related discussions prior to approval	✗	✗	✗	✗
Terms of Credit prior to approval	✗	✗	✗	✗
Terms of CCF prior to approval	✗	✗	✗	✗
Arrangement of travel, visas and accommodation prior to approval	✗	✗	✗	✗
Advise the customer of Crown's Junket approval process, if they wish to proceed, gather required information without discussing gaming terms- ID to be obtained as soon as practicable	✓	✓	✓	✗

8

VIP International | Operating Procedures - Malaysia

Other Procedures to be Complied With



Subject	Malaysia
<p>All existing and proposed Malaysian customers (other than ethnic Malays) must be screened (in Australia and/or Hong Kong) * #</p> <p>*All existing customers are screened on a regular basis by Crown Compliance and AML teams</p> <p># The details of all new people the Malaysia staff meet with are to be provided to the Compliance Executive for screening as soon as possible and always prior to any relationship being created, namely prior to any arrangements being undertaken (e.g. terms, travel etc.) that might result in the person becoming a customer</p>	✓
<p>Low profile non-gaming meetings, phone discussions and interactions with targeted and screened high value individuals (at least two staff must be in attendance for all meetings)</p>	✓
<p>Gaming related discussions may occur between staff (no other persons present)</p>	✓
<p>If other persons attend uninvited, exercise discretion and decide whether to continue the meeting</p>	✓
<p>All contact (activities and discussions) with customers must be logged in Salesforce within 24 hours and where applicable, include notation of staff in attendance</p>	✓

VIP International | Operating Procedures - Malaysia



Prohibited Activities

Subject	Malaysia
Meet with PRC Customers (unless resulting from an incidental contact and no gaming can be discussed)	⊘
Call, meet or engage with Ethnic Malays (no exceptions)	⊘
Make travel, visa or accommodation arrangements for any customer	⊘
Market (gaming related) to prospective or current Malaysia customers	⊘
Meet with any non-DICI, non-Crown Approved Junket Operator, Affiliate or Other Associated Persons that has not been through the screening process	⊘
Discuss any aspect of gaming (terms, credit, debt collection, etc.) * A script will be provided and must be used in cases where a customer attempts to engage in a gaming discussion	⊘
Meet with more than five (5) customers at a time (without prior approval from the Compliance Executive, with such approval recorded in Salesforce)	⊘
Take any Crown device with you to a meeting, other than a Crown 'Travel Approved' device	⊘
Use public Wi-Fi for email or any other electronic communications	⊘
Dock any external storage device to the Crown 'Travel Approved' device	⊘
Arranging the movement of money or handling of money in any way (including chips)	⊘

10

VIP International | Operating Procedures - Malaysia



Prohibited Activities – PRC Customers

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Travel to the PRC on Crown business	⊘	⊘	⊘	⊘
Outbound sales or marketing to PRC Customers	⊘	⊘	⊘	⊘
*Outbound calls (from Australia only) can be made to PRC customers by non sales and non travelling staff. The customer will then be requested to call the relevant Sales person in Hong Kong.	*			
Outbound calls to any customer, regardless of nationality, living in PRC (+86 phone numbers)	⊘	⊘	⊘	⊘
*Outbound calls (from Australia only) can be made into PRC by non sales and non travelling staff. The customer will then be requested to call the relevant Sales person in Hong Kong.	*			

VIP International | Operating Procedures - Malaysia



Prohibited Activities – PRC Customers

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Initiating contact with PRC Customers (any electronic platform, email, social media, messaging etc.)	⊘	⊘	⊘	⊘
Making credit available to PRC Customers	⊘ *	⊘	⊘	⊘

*In very limited circumstances and with strict terms, Credit may be granted to PRC customers by the CEO after consideration and agreement by Senior Management (case by case)

VIP International | Operating Procedures - Malaysia

Money Changers



Subject	In Office	Travelling
If a customer requests information or assistance about money exchange activities, Crown staff can provide a link to patrons for government approved exchangers and remitters for each relevant country.	✔	✔
Note: Money Changers must be registered to conduct exchange and remittance activities within their relevant jurisdiction		
Suggesting an alternative (non-registered) Money Changer	✘	✘
Providing or suggesting details of any bank account/s	✘	✘
Taking commission (in any form) from a customer or Money Changer	✘	✘
Arranging the movement of money outside the casino (including chips)	✘	✘
Handling money in any way outside the casino (including chips)	✘	✘

VIP International | Operating Procedures - Malaysia

Debt Collection



Outbound debt collection activities (calls, emails etc.) to customers **except any PRC Customers** can occur in accordance with the following table: (log all contact in Salesforce within 24 hours)









Subject	Australia	United Kingdom	Hong Kong	Malaysia
Repayment of Debts	✓	✗	✓	✗
Repayment of CCF	✓	✓	✓	✗
Sending of Debt Collection letters: Letters can be prepared and sent from a Hong Kong Legal representative under instruction from Melbourne. Letters can be sent from Australia into PRC by Legal but cannot reference future visits/trips.	✓	✗	✗	✗
Preparing and serving Legal proceedings - Hong Kong Legal representative under instruction from Melbourne	✓	✗	✗	✗
Discussion of debts when meeting with any customer	✓	✓	✓	✗

VIP International | Operating Procedures - Malaysia

Debt Collection – PRC Customers



Debt collection activities (calls, emails etc.) to **PRC Customers** can occur in accordance with the following table: (log all contact in Salesforce within 24 hours)

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Initiating contact with PRC Customers in any way (email, social media, messaging service, etc.) * Calls can be made from Australia into PRC by non travelling staff re: Debt Collection. * Customers may be requested to contact the relevant Sales Person in Hong Kong. * No reference can be made to future visits/trips.	 *			
Discussion of debts during Inbound contact with a PRC customer				

VIP International | Operating Procedures - Malaysia



Arranging Travel and the Private Jet

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Discussions with customers, about preferences of travel (including the Jet), visas or accommodation * Not linked to a gaming or turnover target or Front Money	✓	✓	✓	✓
Discussions with customers about the Jet that involves a minimum turnover or front money target * For PRC Customers outside the PRC, discussions and arrangements of Jet travel must be with Executive Management approval and not be linked in any way to gaming targets or other incentives	✓	✓	✓	✗
Making arrangements with customers, for booking travel, Jet, visas or accommodation	✓	✗	✗	✗
Jet travel in or out of PRC (or Indonesia) for Crown or charter purposes	✗	✗	✗	✗
Accompanying customers on the Jet (International) – Outbound from Australia and arranged from Australia	✓	✓	✓	✓
Accompanying customers on the Jet (International) – Inbound to Australia (consult with Compliance Executive)	✗	✗	✗	✗

16

VIP International | Operating Procedures - Malaysia



Arranging Travel and the Private Jet – continued

Subject	Australia	United Kingdom	Hong Kong	Malaysia
Discussions with customers, except PRC Customers about Jet travel as part of the gaming discussion	✓	✓	✓	⊘
Staff travel on an APEC card	✓	✓	✓	✓
Staff travel on Home Return Permit (issued by PRC)	⊘	⊘	⊘	⊘
Turnover targets for Private Jet travel included in Program terms	✓	✓	✓	⊘
Arranging travel for a customer's personal holiday	✓	⊘	⊘	⊘
Accompanying customers on the Jet (Domestic)	✓	N/A	N/A	N/A
Recommending a (licensed) Travel Agent for a customer to make their own arrangements (International staff must not be involved in discussions with the Travel Agent)	✓	✓	✓	✓

17



Travel Approved Devices

INTRODUCTION

All employees should ensure they carefully consider information security risks when using an electronic device while overseas. The compromise of your device could have an impact on you and the business, its information and its reputation. In most countries, you have no expectation of privacy in internet cafés, hotels, offices or public places.

The IT department and Compliance Executive will assist you prior to travelling, however, when you are travelling it is your responsibility to ensure the security of your information.

Gaming related data must not be stored on any device outside of Australia, London or Hong Kong.

Subject	Malaysia
Remove all non-essential data from the device	✓
Disable any feature or software that is not required for the trip	✓
Disable Bluetooth and wireless capabilities and the ability to 'auto-join' a network	✓
Ensure strong passwords are used	✓
Back up your data before you travel	✓
Store any gaming related data on any electronic device	✗

18

VIP International | Operating Procedures - Malaysia



Travel Approved Devices

Subject	Malaysia
Keep your device in your possession at all times	✓
Devices must be taken onto the plane as hand luggage	✓
Where possible, connect back to your virtual private network (VPN) to use the internet	✓
Ensure any devices that are left in your residence or hotel room are locked and secured	✓
Clear your web browser after each use	✓
All passwords associated with a mobile device should be changed upon return from overseas travel	✓
Do not connect USB devices such as iPhones, iPods and portable storage devices	✗
Do not use a non-controlled web-based email service, such as Gmail, Hotmail or Yahoo, for business purposes	✗
Do not connect to open Wi-Fi networks for business purposes	✗
Immediately advise IT security staff and the Compliance Executive if your device is taken out of your possession for any reason	✓

19

**Destroy ID / domicile / police check once sent to Melbourne**

When sales staff collect ID, proof of domicile or police check information for a potential new customer or a non-Macau licensed/Crown Approved Junket Operator, they must delete or destroy the information after they have sent it to the Compliance Executive and the Commercial Team in Melbourne.

Don't disclose personal information outside of the Crown Group

Sales staff must not disclose any personal information of customers or junket operators outside of the Crown Group. Personal information includes an individual's name, address, telephone numbers, email addresses, gaming history, race, religion, health information, passport, driver's licence, police check, etc.

Keep personal information secure at all times

The computers, phones and mobile devices of sales staff contain personal information of customers.

To keep customer personal information secure at all times, sales staff must:

Keep your Salesforce log-in and password private and don't disclose it to anyone

Ensure your computer, phone and mobile devices are password protected and don't disclose the passwords to anyone, always use strong (not obvious) passwords

Never write down a password or store it with a computer, phone or mobile device

Never place any customer personal information onto a usb

Never send Crown files to any personal email addresses

Never leave your computer, phone or mobile devices unlocked

Never access customer personal information if using external Wi-Fi

Always be alert for fraudulent / phishing emails

Keep physical control of your computer, phone and mobile devices at all times

VIP International | Operating Procedures - Malaysia

Anti-Bribery and Corruption & Receipt of Gifts, Tips and Gratuities



Crown takes a zero tolerance approach to acts of bribery or corruption. Gifts, hospitality and entertainment must never be given or received with the aim of influencing a business decision or securing an unfair business advantage (see Crown's Anti-bribery and Corruption Policy).

All VIP International Employees	Gifts, Tips, and Gratuities
VIP International employees cannot ask for, seek, imply a request or accept from a patron any gifts, tips, gratuities or benefits	⊘
In cases where refusal to receive a gift, tip or gratuity is not accepted by the customer, or the gift is left, posted or delivered by another means which is incapable of refusal, the item must be surrendered to the Compliance Executive The Compliance Executive will record the item in their Gift Register to be audited by the Group General Manager – Regulatory and Compliance and arrange disposal as per procedure	⊘
Gifts may be given or delivered to customers in accordance with the VIP International Gifts to Patrons Policy	✔

21



Definitions

- **'Affiliate'** means a person acting in an official capacity for the Junket Operator.
- **'Compliance Executive'** reports to the Group General Manager – Regulatory and Compliance in Melbourne. Offers specialised regulatory and compliance advice and support to the VIP International team to ensure adherence to the VIP Procedures.
- **'Salesforce'** means Crown's licensed version of the Salesforce Customer Resource Management application.
- **'Crown Approved'** means approval has been obtained from the VIP Commercial team in Melbourne to deal with the Junket, Agent or Premium Player.
- **'DICJ'** the Macau gambling regulator.
- **'DICJ Approved'** an individual or company that holds a current licence to operate Junkets within Macau.
- **'Ethnic Malay'** Malaysian people who identify as Muslim.
- **'Junket'** means an arrangement whereby a person or a group of people is introduced to a casino operator by a Junket organiser or promoter who receives a commission based on the turnover of play in the casino attributable to the persons introduced by the organiser or promoter or otherwise calculated by reference to such play.



Definitions

- **'Money Changer'** a person or organisation whose business is the exchange of coins or currency of one country, for that of another and/or the remittance of funds between accounts and countries.
- **'Other Associated Person'** means a person associated with a Junket without having any official role in the operation of the Junket's activities.
- **'Travel Approved' device (device)** means an electronic device (phone, tablet etc.) that has been approved by Crown for business travel that has had remote data deleting capability installed.



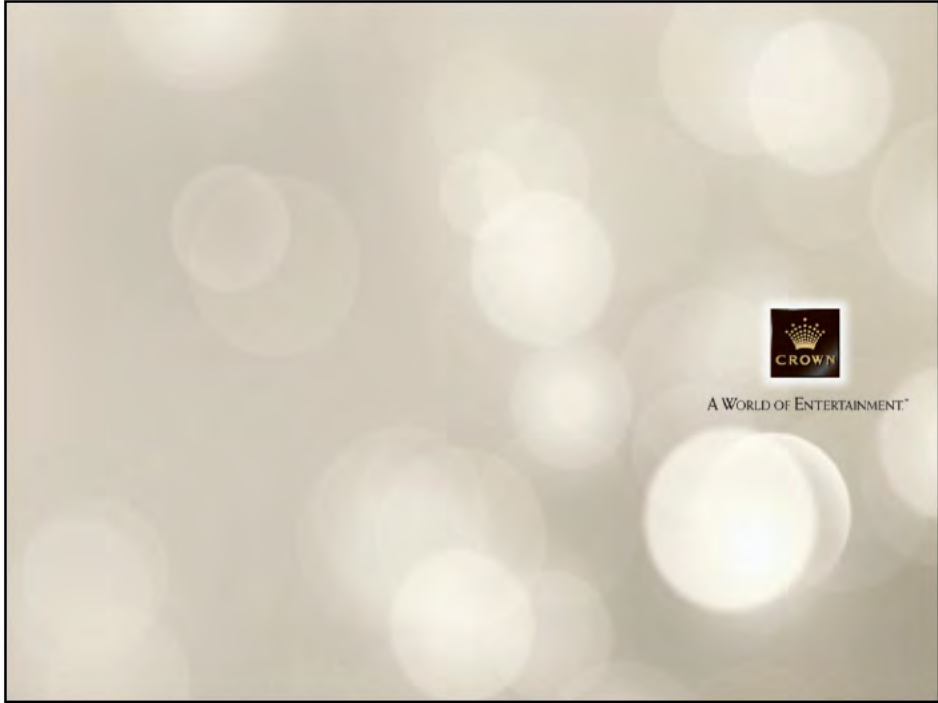
Compliance Executive Role

- **The Compliance Executive** is a supporting role for the Hong Kong office.
- Offer specialised regulatory and compliance advice and support to the VIP International team to ensure adherence to the VIP Procedures.
- Monitor actions/work conducted from compliance/regulatory perspective and reports to management of compliance and any other related issues.
- Answer day to day questions that you have and if further clarity is required, email Legal or Regulatory and/or Compliance in Melbourne.
- Will be available instantly/short-notice.
- Make regulatory issues easy to understand and help create efficient processes.
- Collate ID documents and securely communicate with Credit Control, VIP Commercial Team and the Melbourne Compliance Teams.
- Assist with the setup and checking of travel approved devices.
- Ensure due diligence checks are completed on all new players.
- Regular review of active Junket Operators and Representatives.
- Where required, will liaise with Credit Control (tbc) to screen prospective Malaysian customers.
- Will liaise with Credit Control to ensure and document regular screening of all active Malaysian customers.
- Malaysia customer and potential customer screening will only occur in Hong Kong, Melbourne or Perth.



Definitions Used Throughout the Presentation

- **'PRC Customer'** means a People's Republic of China citizen, resident or passport holder but **does not** include a person who resides outside mainland China pursuant to a Right to Reside. Customers who hold a Right to Reside outside of mainland China but who choose to reside in China will be considered **PRC Customers**.
- **'Right to Reside'** means a national ID card, Working Visa or other legal document authorising the holder to live in a particular country or region.
- **'Inbound'** means contact initiated by the customer. Customers returning calls, emails or contact by any other means (electronic messaging or otherwise) from a Crown staff member is not considered to be **Inbound**.
- **'Outbound'** means any contact initiated by a Crown staff member directed to a customer, by phone, email, messaging over any application (e.g. WeChat, Messenger, WhatsApp, Skype, Twitter, Snapchat etc.) or platform (e.g. Samsung, iPad, laptop, iPhone, tablet etc.) or by any other means.
- **'Sales'** means activities involving discussions around program terms, credit (or CCF for Crown Aspinalls London), travel, flights and accommodation preferences, etc.
- **'Marketing'** means sending or distributing Crown produced material (in any format) that promotes Crown's facilities and events.



Version Control	Date	Description	Compliance and Legal approval	
1.0	July 2017	Creation of VIP International Procedures presentation	JP, JW, MF	
2.0	June 2018	<ol style="list-style-type: none"> Changes relating to contact with PRC customers - communications allowable from Australia Expand on Staff Nationality/Residency marketing and Sales restrictions 		
3.0	March 2019	<ol style="list-style-type: none"> New Slides added – Singapore specific Version control added Contents page updated Minor administrative and clarification updates 		
3.1	May 2019	<ol style="list-style-type: none"> New Version created for Malaysian customers, same procedures as Singapore plus: Key change – at least two staff present for all meetings Ethnic Malay definition Staff not to engage with ethnic Malays 		

TAINMENT™