

	7
Contents	CR
Contents	Slide
> Overview	3
> Presentation Definitions	4
Overview – Main points	5
Compliance Officer role	6
> Outbound Sales	7
> Outbound Marketing	8
> Inbound Sales – Customers	9
Inbound Sales – Junkets	10
Prohibited Activities	11
> Staff Visits to Relevant Asian Countries	12-13
> Money Changers	14
> Debt Collection	15
Arranging Travel and the Private Jet	16-17
<ul> <li>Travelling Overseas with an Approved Travel Device</li> </ul>	18-19
➢ Privacy	20
Gifts, Tips and Gratuities	21
Definitions	22-23



#### Overview

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

The revised model is a centralised model with the international business operating from a central office in Hong Kong, with the support of a dedicated Compliance Officer as well as the Melbourne, Perth and London offices.

To support the new operating model, staff will be trained in the new processes and procedures initially and on an ongoing basis.

In that respect, approved regular training, ongoing reviews of protocols and a documented audit program will support compliance and operational outcomes.



### Definitions used throughout the presentation

- 'PRC Customer' means a People's Republic of China citizen, resident or passport holders 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, KakaoTalk, LINE, Viber) or platform (e.g. Samsung, iPad, laptop, iPhone, tablet etc.).
- 'Relevant Asian Countries' includes Macau, Singapore, Thailand, Malaysia, Indonesia, Vietnam, Taiwan, but excludes Hong Kong.
- 'Sales' means activities involving discussions around program terms, credit (or CCF for Crown Aspinalls London), flights and accommodation preferences, etc.
- 'Marketing' means sending or distributing Crown produced material (in any format) that promotes Crown's facilities and events.





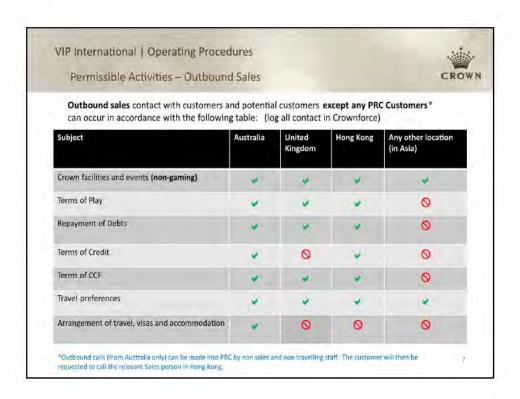
# Main points to remember:

- > Travel to the PRC on business is prohibited
- Outbound sales, marketing activities or initiating contact with PRC Customers is prohibited \* except under specific circumstances listed in slide 11
- Marketing to customers of your own country (nationality or residential status) is prohibited.
- Only discuss Crown's resorts and facilities (non-Gaming) whilst travelling
- All travel must be arranged to Australia (including flights, accommodation and visas) from the Melbourne office
- All travel to London must be arranged through London staff
- All contact, regardless of type or importance must be logged in Crownforce

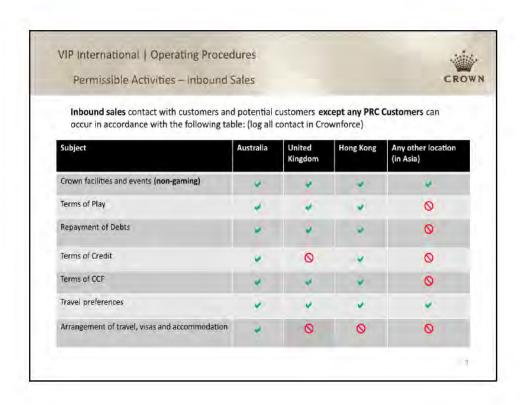


# Compliance Officer Role

- > The Compliance Officer is a supporting role for the Hong Kong office.
- Answer many of the day to day questions that you have and if further clarity is required, email Legal and Regulatory in Melbourne.
- > Offer specialised knowledge of compliance and regulatory issues in VIP Operations
- Will be available instantly/short-notice
- Make regulatory issues easy to understand and help create efficient processes
- Monitor actions/work conducted from compliance/regulatory perspective
- 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









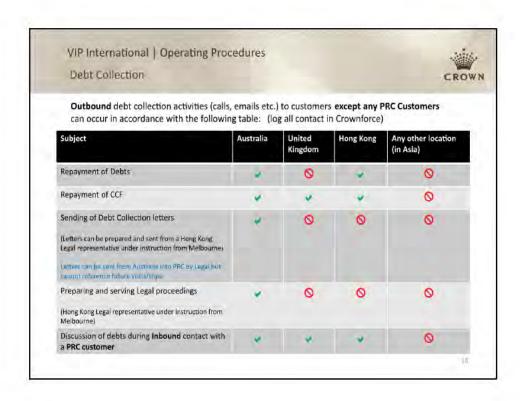
VIP International   Operating Procedures  Prohibited Activities  CI				
Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Travel to the PRC on Crown business	0	0	0	0
Outbound sales or marketing to PRC Customers  "Gutbound calls (from Australia only) can be made to PRC customers by non sales and non travelling staff. The customer will then be requested to call the relevant Sales, person in Hong Kong.	1	0	0	0
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.	t	0	0	0
Initiating contact with PRC Customers (any electronic platform, email, social media, messaging etc.)	0	0	0	0

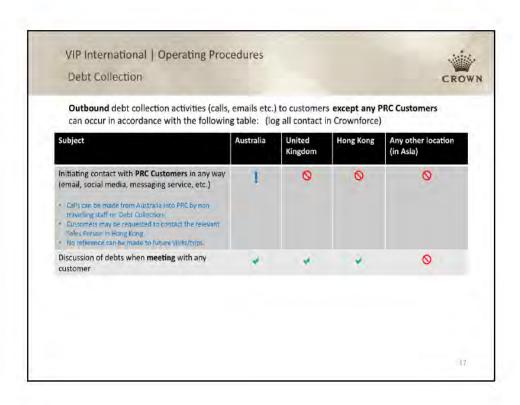
Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Initiating contact with Non-DICI or Crown Approved Junket Operator (any electronic platform, email, social media, messaging etc.)	0	0	0	0
Arranging the movement or handling of money (or chips) in any way outside the casino	0	0	0	0
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 government by Septon Management (case by case)	0	0	0	0



VIP International   Operating Procedures		
Prohibited Activities - Visits to Relevant Asian Countries		CRC
Subject	Any other location ( in Asia)	
Meet with PRC Customers (unless resulting from an incidental contact and no gaming can be discussed)	0	ı
Make travel, visa or accommodation arrangements for any customer	0	
Marketing to customers of the same country that you reside in or are hold a passport of. (Nationality and Residency status)	0	
Meet with any non-DICI or non-Crown Approved Junket Operator, Affiliate or Other Associated Persons (without Compliance Officer approval)	0	
Discuss any aspect of gaming (terms, credit, debt collection, etc.)	0	
Meet with more than five (5) customers at a time (without prior written approval from the Compliance Officer)	0	
Take any Crown device with you, other than a Crown 'Travel Approved' device	0	
Use public Wi-Fi for email or any other electronic communications	0	
Dock any external storage device to the Crown 'Travel Approved' device	0	
Arranging the movement of money or handling of money in any way (including chips)	0	

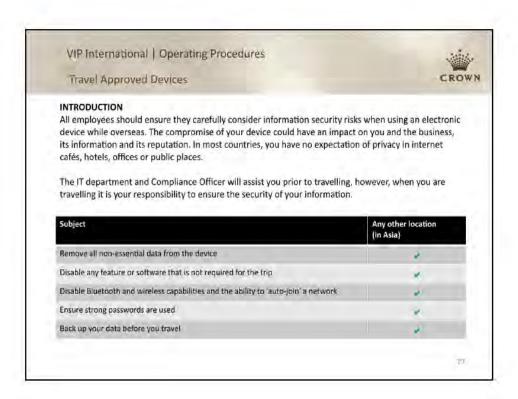
Money Changers		CR	
Subject	In Office	Travelling	
If a customer requests information or assistance about money exchange activities, you may suggest at least two registered money changers		1	
Note: Money changers must be registered within the relevant jurisdiction and be approved by Crown	٧		
An approved list of money changers is available from the Compliance Officer and will be reviewed and updated on a regular basis			
Suggesting an alternative (non-approved) money changer	0	0	
Providing or suggesting details of any bank account/s	0	0	
Taking commission (in any form) from a customer or money changer	0	0	
Arranging the movement of money outside the casino (including chips)	0	0	
Handling money in any way outside the casino (including chips)	0	0	

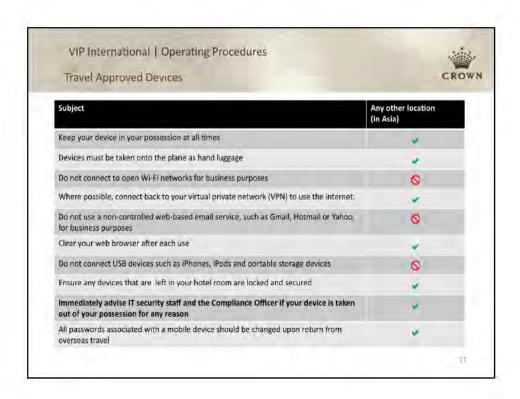




VIP International   Operating Procedures  Arranging Travel and the Private Jet  C				CRO
Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Discussions with customers, except-PRC Customers- about preferences of travel, Jet, visas or accommodation	*	*	*	*
Making arrangements with customers, except PRC- Customers for booking travel, Jet, visas or accommodation	*	0	0	0
Making arrangements with customers, except PRC Customers about details of travel on the Jet that involves a minimum turnover or front money target	*	*	*	*
For PRC Customers, discussions, and arrangements of Jet travel must not be linked in any way to gaming targets or other inducements.	.1.	1	1	1
Jet travel in or out of PRC (or Indonesia) for Crown or charter purposes	0	0	0	0
Accompanying customers on the Jet (International)  – Outbound from Australia and arranged from Australia	*	*	*	*
Accompanying customers on the Jet (International)  – Inbound to Australia (consult with CO)	0	0	0	0

VIP International   Operating Procedures  Arranging Travel and the Private Jet – continued  CR				
Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Discussions with customers, except PRC Customers about Jet travel as part of the gaming discussion	*	*	*	0
Staff travel on a Private Jet belonging to a customer except to/from PRC	*	*	*	*
Staff travel on an APEC card	*	*	*	
Staff travel on Home Return Permit (issued by PRC)	0	0	0	0
Turnover targets for Private Jet travel included in Program terms				0
Arranging travel for a customers personal holiday		0	0	0
Accompanying customers on the Jet (Domestic)	*	*	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)	•	*	*	*







### Privacy

# 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 junket operator, they must delete or destroy the information after they have sent it to the Compliance Officer 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 Crownforce 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.

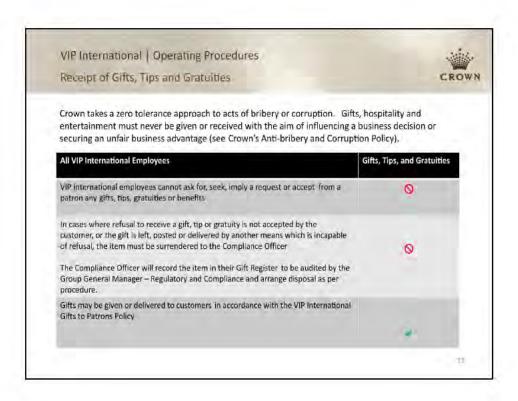
Never send Crown files to any personal email addresses.

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





#### Definitions

- 'Affiliate' means a person acting in an official capacity for the Junket Operator.
- 'Approved Form of Invitation' means an invitation (made verbally or in writing) to a meeting [e.g. dinner, event etc.] that has been reviewed and approved by the Compliance Officer and VIP International Commercial Team.
- 'Compliance Officer (CO)' reports to the Group General Manager Regulatory and Compliance in Melbourne. The VIP International Commercial Team and Credit Control will be consulted by the Compliance Officer on all relevant issues.
- 'Crownforce' means Crown's licensed version of the Salesforce 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.
- '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.
- '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) that has been approved by Crown for business travel that has had remote data deleting capability installed.

