



# VIP International – Operating Procedures

June 2017 (revised July 2018)





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## VIP International | Operating Procedures



## 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

## Permissible Activities – Outbound Sales



**Outbound sales** contact with customers and potential customers **except any PRC Customers\*** can occur in accordance with the following table: (log all contact in Crownforce)

Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Crown facilities and events (non-gaming)	✓	✓	✓	✓
Terms of Play	✓	✓	✓	✗
Repayment of Debts	✓	✓	✓	✗
Terms of Credit	✓	✗	✓	✗
Terms of CCF	✓	✓	✓	✗
Travel preferences	✓	✓	✓	✓
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

## Permissible Activities – Outbound Marketing



**Outbound marketing** contact with customers and potential customers **except any PRC Customers** can occur in accordance with the following table: (log all contact in Crownforce)

Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Crown facilities ( <b>non-gaming</b> )	✓	✓	✓	✓
Crown events ( <b>non-gaming</b> )	✓	✓	✓	✓
Crown brochures ( <b>promoting non-gaming</b> )	✓	✓	✓	✓
Emails containing images of gaming	✓	✓	✓	✗
Sales App	✓	✓	✓	✗
Electronic contact (messaging etc.) containing links to Crown webpages (gaming images)	✓	✓	✓	✗



## VIP International | Operating Procedures

## Permissible Activities – Inbound Sales



**Inbound sales** contact with customers and potential customers **except any PRC Customers** can occur in accordance with the following table: (log all contact in Crownforce)

Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Crown facilities and events ( <b>non-gaming</b> )	✓	✓	✓	✓
Terms of Play	✓	✓	✓	✗
Repayment of Debts	✓	✓	✓	✗
Terms of Credit	✓	✗	✓	✗
Terms of CCF	✓	✓	✓	✗
Travel preferences	✓	✓	✓	✓
Arrangement of travel, visas and accommodation	✓	✗	✗	✗

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## VIP International | Operating Procedures

## Permissible Activities – Inbound Sales



**Inbound sales** contact with potential non-DICJ Approved Junket Operators **except any PRC Customers** can occur in accordance with the following table: (log all contact in Crownforce)

Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Crown facilities and events (non-gaming)	✓	✓	✓	✓
General discussions prior to any agreement being reached - ID to be obtained as soon as practicable	✓	✓	✓	✗
Terms of Play	✗	✗	✗	✗
Terms of Credit	✗	✗	✗	✗
Terms of CCF	✗	✗	✗	✗
Arrangement of travel, visas and accommodation	✗	✗	✗	✗
Advise the customer of Crown's junket approval process and gather required information if they wish to proceed and obtain approval to operate	✓	✓	✓	✓

## VIP International | Operating Procedures

## Prohibited Activities



Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Travel to the PRC on Crown business	⊘	⊘	⊘	⊘
Outbound sales or marketing to <b>PRC Customers</b>	!	⊘	⊘	⊘
<small>*Outbound calls (from Australia only) can be made to <b>PRC customers</b> by non sales and non travelling staff. The customer will then be requested to call the relevant Sales person in Hong Kong.</small>				
Outbound calls to any customer, regardless of nationality, living in <b>PRC (+86 phone numbers)</b>	!	⊘	⊘	⊘
<small>*Outbound calls (from Australia only) can be made into <b>PRC</b> by non sales and non travelling staff. The customer will then be requested to call the relevant Sales person in Hong Kong.</small>				
Initiating contact with <b>PRC Customers</b> (any electronic platform, email, social media, messaging etc.)	⊘	⊘	⊘	⊘

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## VIP International | Operating Procedures

## Prohibited Activities



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.)	⊘	⊘	⊘	⊘
Arranging the movement or handling of money (or chips) in any way outside the casino	⊘	⊘	⊘	⊘
Making credit available to PRC Customers *	⊘	⊘	⊘	⊘
<small>*In very limited circumstances and with strict terms, Credit may be granted to PRC customers by the CED after consideration and agreement by Senior Management (case by case)</small>				

## VIP International | Operating Procedures

## Permissible Activities – Visits to Relevant Asian Countries



Subject	Any other location (in Asia)
Meet for coffee, lunch or dinner with existing and prospective customers, except <b>PRC Customers</b> * Keep meetings as small and as low-key as practical, no more than five guests in total	✔
If other persons attend uninvited, exercise discretion and decide whether to continue the meeting	✔
Discuss Crown's non-gaming facilities and non-gaming events	✔
Discuss customer travel preferences	✔
If a customer wants to discuss any gaming aspects (terms, credit, debt collection etc.), politely decline and advise that this is not the purpose of the visit	✔
Take only a 'Travel Approved' device when travelling	✔
Take approved marketing promoting Crown Resorts' non-gaming facilities and non-gaming events * Documents must not contain any information (or photos) of any gambling activities	✔
Give or send gifts to customers (non-gaming) in accordance with VIP International Patron Gift Policy	✔

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## VIP International | Operating Procedures

## Prohibited Activities - Visits to Relevant Asian Countries



Subject	Any other location ( In Asia)
Meet with <b>PRC Customers</b> (unless resulting from an incidental contact and no gaming can be discussed)	⊘
Make travel, visa or accommodation arrangements for any customer	⊘
<b>Marketing to customers of the same country that you reside in or are hold a passport of. (Nationality and Residency status)</b>	⊘
Meet with any non-DICJ or non-Crown Approved Junket Operator, Affiliate or Other Associated Persons (without Compliance Officer approval)	⊘
Discuss any aspect of gaming (terms, credit, debt collection, etc.)	⊘
Meet with more than five (5) customers at a time (without prior written approval from the Compliance Officer)	⊘
Take any Crown device with you, 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)	⊘

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## VIP International | Operating Procedures

## Money Changers



Subject	In Office	Travelling
If a customer requests information or assistance about money exchange activities, you may suggest at least two registered money changers	✓	✓
<b>Note:</b> Money changers must be registered within the relevant jurisdiction <b>and</b> be approved by Crown		
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	✗	✗
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

## 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 Crownforce)

Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Repayment of Debts	✓	✗	✓	✗
Repayment of CCF	✓	✓	✓	✗
Sending of Debt Collection letters <small>(Letters can be prepared and sent from a Hong Kong Legal representative under instruction from Melbourne) <a href="#">Letters can be sent from Australia into PRC by Legal but cannot reference future visits/tips</a></small>	✓	✗	✗	✗
Preparing and serving Legal proceedings <small>(Hong Kong Legal representative under instruction from Melbourne)</small>	✓	✗	✗	✗
Discussion of debts during <b>Inbound</b> contact with a <b>PRC customer</b>	✓	✓	✓	✗

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## VIP International | Operating Procedures

## 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 Crownforce)

Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Initiating contact with <b>PRC Customers</b> in any way (email, social media, messaging service, etc.) <ul style="list-style-type: none"> <li>• Calls can be made from Australia into PRC by non-travelling staff re: Debt Collection.</li> <li>• Customers may be requested to contact the relevant Sales Person in Hong Kong.</li> <li>• No reference can be made to future Visits/trips.</li> </ul>	!	⊘	⊘	⊘
Discussion of debts when <b>meeting</b> with any customer	✓	✓	✓	⊘

## VIP International | Operating Procedures

## Arranging Travel and the Private Jet



Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Discussions with customers, <b>except PRC Customers</b> about preferences of travel, Jet, visas or accommodation	✓	✓	✓	✓
Making arrangements with customers, <b>except PRC Customers</b> for booking travel, Jet, visas or accommodation	✓	✗	✗	✗
Making arrangements with customers, <b>except PRC Customers</b> about details of travel on the Jet that involves a minimum turnover or front money target	✓	✓	✓	✓
For <b>PRC Customers</b> , discussions and arrangements of Jet travel must not be linked in any way to gaming targets or other inducements	!	!	!	!
Jet travel <b>in or out of PRC</b> (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 CO)	✗	✗	✗	✗

## VIP International | Operating Procedures

## Arranging Travel and the Private Jet – continued



Subject	Australia	United Kingdom	Hong Kong	Any other location (in Asia)
Discussions with customers, <b>except PRC Customers</b> about Jet travel as part of the gaming discussion	✓	✓	✓	✗
Staff travel on a Private Jet belonging to a customer <b>except to/from PRC</b>	✓	✓	✓	✓
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 customers personal holiday	✓	✗	✗	✗
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)	✓	✓	✓	✓



### 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 Officer will assist you prior to travelling, however, when you are travelling it is your responsibility to ensure the security of your information.

Subject	Any other location (in Asia)
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	✓

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## VIP International | Operating Procedures

## Travel Approved Devices



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

**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



## VIP International | Operating Procedures

## 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 Officer.	❌
The Compliance Officer 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.	✅

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## 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.

