



Crown Resorts Limited Person of Interest (POI) Process Document

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1. Introduction and Background

The role of the POI Committee (**Committee**) is to ensure that Crown Resorts Limited's casinos¹ (**Crown**) remain free from criminal influence or exploitation, by reviewing persons of interest (**POIs**) who are brought to the attention of the Committee, for a variety of unacceptable behaviors, including but not limited to, allegations relating to:

Dealing in proceeds of crime	Threat to safety of patrons or staff
Drug dealing, theft or fraud	Illegal activity occurring on-site
Money Laundering/Terrorism Financing	Illegal activity occurring off-site

The Committee will review any information presented to it and decide whether the POI should be permitted to continue to access and/or transact with Crown, or whether a withdrawal of licence notice (**WOL**), Notice Revoking Licence (**NRL**) and/or Exclusion Order should be issued to the POI, preventing them from accessing and/or transacting with Crown. The Committee will also review POIs who apply to have their WOL, NRL and/or Exclusion Order revoked.²

Information related to a POI may come from a variety of sources, including, but not limited to:

- a. Media articles;
- b. Staff;
- c. Law Enforcement Agencies;
- d. Third party providers including but not limited to:
 - i. Dow Jones Risk and Compliance;
 - ii. Factiva;
 - iii. Global Data;
 - iv. Wealth X;
 - v. Acuris/C6
- e. Unusual Activity Reports; and
- f. Any other sources.

¹ Crown Resorts Limited's casinos include Crown Melbourne, Crown Perth, Crown Aspinalls and Crown Sydney.

² It is notable that not all matters of unacceptable or potentially illegal behaviour are brought to the attention of the POI Committee. The Security Department at each property has authority to deal with matters immediately as they arise in the property (for example, if an incident of drug use is identified in the building, Security will immediately proceed with the WOL/NRL process).

2. Process

2.1 POI Meeting and Out-of-Meeting Process

The Committee will review and assess POIs as to whether they should be permitted to continue to access and transact with Crown, as well as whether POIs who are currently banned are permitted to return. This process will take place either at a POI Meeting or via the POI Out-of-Meeting process.

2.2 Patron Decision Assessment (PDA) Tool

The purpose of the PDA tool is to provide consistency through a formulated methodology on the decisions the Committee is asked to make, with regards to POIs and Crown's appetite to continue to do, or consider doing business with them.

The tool is to be completed for each POI, when new or relevant revised information becomes known to Crown.

It is designed to give a clear indication for those matters that either are:

- a. not material, and therefore do not require a decision from the Committee; or
- b. Present a heightened risk and should be considered by the Committee for a WOL, NRL or Exclusion.

There are a number of elements in the PDA, which include considerations for:

- a. The nature of the allegations, with Anti-Money Laundering/Counter Terrorism Financing (**AML/CTF**) allegations receiving the highest rating;
- b. The status of the allegations, with individuals convicted/sentenced receiving the highest ratings;
- c. The wellbeing and safety of our staff and patrons;
- d. Where the alleged behaviour took place, with an increased rating where it is known or alleged to have taken place at Crown;
- e. The level of connection that Crown has with the person; and
- f. The direct impact to Crown of being involved with that person, with higher ratings for law enforcement actions and regulatory breaches.

In answering these questions, the rating will automatically take into account the above elements and allocate a level of severity that will inform outcomes. **N.B. if the tool returns a rating of 'High', you must complete and circulate a POI-Out-of-Meeting email and not wait until the next meeting of the Committee.**

2.3 Committee Papers

Relevant documents to be considered at Committee meetings will be provided to the Executive Officer by each property in advance of the meeting, to be compiled and distributed to all Committee members as well as, where relevant, to any invitees.

2.4 POI Meetings

- a) An overview of the matter and relevant information will be provided to the Committee members by each property, including a PDA form;
- b) The Committee members will be asked for comments;
- c) A decision as to whether or not a WOL, NRL and/or Exclusion Order is to be issued will be made;
- d) The Executive Officer will record the Committee's decision on the PDA form and circulate a record of final decisions to the Committee; and
- e) Where a decision is made to issue/revoke a WOL, NRL or exclude a POI, the head of Security and Surveillance (howsoever titled) at each property will be responsible for ensuring that the stop codes will be added/removed.

2.5 POI Out-of-Meeting Process:

Where the POI Out-of-Meeting process is used:

- a) The completed POI Out-of-Meeting Action email must be sent to the POI Committee email group, including a completed PDA, to ensure that all Committee members receive the relevant information;
- b) The email will state that Committee members must reply by a specified date and time, if they wish to raise any matters for consideration; issues in objection or support of the POI receiving a WOL, NRL and/or Exclusion Order; and
- c) The Chairperson will then Reply-all to the Committee, giving notice of the end decision³ and asking the head of Security and Surveillance at each property to take the applicable action (if any).

2.6 Escalation of Decision

When the Committee is not able to reach a decision, the matter will be escalated to the CEO – Crown Resorts, CEO – Australian Resorts and CLO – Australian Resorts (**Executive Sub-Group**) for decision.

2.7 Executive Sub-Group Reporting

The Committee will update the Executive sub-group as required, and make relevant recommendations in relation to matters arising for consideration by the Committee.

2.8 Length of WOL/NRL/Exclusion

A WOL, NRL and/or Exclusion Order issued by the POI Committee is indefinite. The POI who has been the subject of a WOL, NRL and/or Exclusion Order may request a review of this in writing, addressed to:

³ The end decision may include to WOL, NRL and/or exclude the POI; to take no action; to revert the matter to a meeting; or any such other outcome as deemed appropriate.

Security Department
[Relevant Property Address]

Documents to support the request for revocation of the WOL, NRL and/or Exclusion Order may be requested by the POI Committee.

3 Amendment and Review

This document must be updated in line with the annual review of the POI Charter, to ensure it remains consistent with its objectives and existing regulatory requirements and recommendations.

Crown Resorts Limited
November 2020