

## APPENDIX C

Name of Internal Control Statement	Date approved by VCGLR	Purpose of Internal Control (as noted in the ICS)	Recommended amendment(s)	Comments
Table Games Operations	8 March 2016	To ensure the integrity and continuity of Table Games Operations in accordance with regulatory requirements.	ICS reviewed. Change proposed.	It is proposed that the following text will be inserted into the Table Games Operations ICS and submitted for approval:  <i>Any initiative and/or proposed variation to a table game (that is, not business as usual changes<sup>1</sup>), not covered by an existing or proposed VCGLR approval, must be provided to Crown's Regulatory and Compliance Department prior to implementation, to determine whether regulatory approval is required.</i>
Cage Operations	2 March 2015	To ensure the integrity and continuity of Cage Operations through processes and procedures which ensure all transactions relating to the conduct of gaming at the Melbourne Casino are accounted for and correctly reported via the operation of the Cage.	ICS reviewed. Change proposed.	It is proposed that the following text will be inserted into the Cage Operations ICS and submitted for approval:  <i>Any change initiative project (that is, not business as usual changes), not covered by an existing or proposed VCGLR approval, must be provided to Crown's Regulatory and Compliance Department prior to implementation, to determine whether regulatory approval is required.</i>
Cheque Cashing and Credit Facilities (Incorporating Debt Collection and the Discharge of Patron Debts)	26 October 2016	To ensure the application and documentation of effective processes and procedures for:  - Assessing the identity and creditworthiness of applicants for cheque cashing and/or credit facilities; and  - Collecting and discharging patron debts	ICS reviewed. No change necessary.	Cheque Cashing and Credit Facilities are not generally the subject of projects or works in progress, but rather a uniformed process to be followed. Additionally, the discharges of any debts are processed through the VCGLR (either approval is sought or notification provided) by the Regulatory and Compliance Department, any changes affecting these processes would therefore necessarily be known to the Regulatory and Compliance Department.
Contracts	27 February 2018	To ensure Crown operates in accordance with the provisions of Division 2 – Contracts of the <i>Casino Control Act 1991 (Vic)</i> , ensuring the practice of	ICS reviewed. No change necessary.	Controlled Contracts are not generally the subject of projects or works in progress, but rather a uniformed process to be followed. Additionally, Controlled Contracts processes are managed by the Regulatory and Compliance Department, any initiatives would therefore necessarily be known by the Regulatory and Compliance Department.

<sup>1</sup> Business as usual changes might include for example: change of table layout, the movement of cameras, movement of gaming product, maintenance, increasing security or surveillance operator numbers etc. (**Note** for the avoidance of doubt, this footnote applies across all of the proposed ICS changes).

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		good corporate governance and that relevant contractual supply arrangements and associated purchasing activities are adequately assessed, documented and supported.		
Surveillance	4 April 2018	To provide integrated Surveillance Operations across the Casino complex.	ICS reviewed. Change proposed.	It is proposed that the following text will be inserted into the Surveillance ICS and submitted for approval:  <i>Any change initiative project (that is, not business as usual changes) not covered by an existing or proposed VCGLR approval and which impacts gaming operations, must be provided to Crown's Regulatory and Compliance Department prior to implementation, to determine whether regulatory approval is required.</i>
Count Room and Drop Box, Drop Bucket and Note Stacker Collection	13 October 2017	To complete the authorised, systematic collection and the accurate counting, of all cash and cash equivalent items, accumulated during the course of gaming.	ICS reviewed. No change necessary.	Count Room and Drop Box, Drop Bucket and Note Stacker Collection are not generally the subject of projects or works in progress, but rather a uniformed process to be followed.
Employee Appointments (Licensed and Unlicensed Positions)	12 April 2017	To ensure effective processes, procedures and reporting (where applicable) for the appointment of licensed and unlicensed employees.	ICS reviewed. No change necessary.	Employee Appointments are not generally the subject of projects or works in progress, but rather a uniformed process to be followed. Additionally, Employee Appointments are managed by the Regulatory and Compliance Department, any initiatives would therefore necessarily be known by the Regulatory and Compliance Department.
Gaming Equipment	12 July 2018	To ensure the accountability and integrity of gaming equipment.	ICS reviewed. No change necessary.	Clause 2.4 of the Gaming Equipment ICS already covers the matters the subject of this review, it provides: <i>Prior to activation and use on the gaming floor, confirmation that gaming equipment is approved by the VCGLR and complies with the relevant approval and where applicable, the seal/version/model number or other form of relevant identification is verified.</i>
Gaming Machines Operations	31 December 2018	To ensure effective processes and procedures for the operation of electronic gaming machines, including but not limited to:  - Electronic gaming	ICS reviewed. No change necessary.	A change has already been made to cover the matters the subject of this review and approved by the VCGLR. In this respect see 2.11 <i>Any initiative and/or proposed variation to a gaming machine game or type not covered by a gaming machine approval must be provided to Crown's Regulatory and Compliance Department prior to implementation, to determine whether regulatory approval is required.</i>

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		<p>machine configuration (including jackpot configuration);</p> <ul style="list-style-type: none"> <li>- Electronic gaming machine payouts; and</li> <li>- Issue resolution.</li> </ul> <p>Segregated approval and verification of key processes and procedures.</p>		
Internal Audit	11 November 2008	To ensure the ongoing operation of an effective and independent Internal Audit function.	ICS reviewed. No change necessary.	<p>Internal Audit is not generally the subject of projects or works in progress, but rather a process and policy to be adhered to. As noted in the current approved Internal Audit ICS, the <i>'Internal Control Statement together with the provisions of the Casino Agreement including reporting requirements set out in Schedule 5 provide sufficient framework for the Internal Audit function.'</i></p> <p>As discussed with the VCGLR, a review has been undertaken of this ICS to ensure that its few remaining relevant controls were moved to alternate ICSs. This ICS will be the subject of a submission for it to be revoked.</p>
Introductory Chapter	24 December 2015	Defines Crown's system of internal controls.	ICS reviewed. No change necessary.	The Introductory Chapter is not generally the subject of projects or works in progress, but rather a uniformed process to be followed. Additionally, as the Introductory Chapter is managed by the Regulatory and Compliance Department, any initiatives would necessarily be known to the Regulatory and Compliance Department. Further, clause 8.1 provides that <i>'All amendments to an ICS require the prior written approval of the VCGLR.'</i>
IT Operations	1 May 2019	To ensure the application and documentation of effective processes and procedures to safeguard the data and system integrity, stability, security, auditability, accountability and recoverability of IT gaming systems.	ICS reviewed. No change necessary.	<p>IT does not generally initiate projects or works for the commercial business, but rather are the recipients and processors of projects initiated by other departments. Nonetheless, the IT Operations ICS is subject to significant monitoring, notification, approval and auditing by the VCGLR. These include: a requirement for independent review and authorisation processes for tasks referenced in the Appendix, and goes on to note that changes to the Appendix require notification to the VCGLR; independent verification of gaming system software changes, pre and post-installation ensuring compliance with the version approved by the VCGLR; approval by the VCGLR (accompanied by a recommendation from an ATF) of: gaming software applications, gaming system documentation updates (including the Baseline Documents), the Network Policy Document and the Storage Area Policy Document. Notification is required to the VCGLR of: emergency gaming system software change installations, together with an updated CRC value; and gaming system operating system and platforms patches, including security patches. System Incident Reports must also be submitted to the VCGLR, including notifications of unresolved issues. These extensive VCGLR approvals and notifications leave little scope for the necessity of an assessment by the Regulatory and Compliance Department as to whether regulatory approval is required. Additionally, each of these approvals and</p>

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				notifications are either made by the Regulatory and Compliance Department or would be reported to the Regulatory and Compliance Department through the CURA reporting system – accordingly, each becomes known to the Regulatory and Compliance Department.
Revenue Audit and Reporting	1 April 2019	To ensure the integrity of gaming activity and the accurate reporting of monthly GGR for the purpose of calculating taxes and fees payable by Crown. To ensure the security and accountability of gaming cheques and gaming vouchers through the operation of an efficient and effective revenue audit function. To ensure the application and documentation of effective processes and procedures for the establishment and use of patron deposit taking bank accounts.	ICS reviewed. Change proposed.	It is proposed that the following text will be inserted into the Revenue Audit and Reporting ICS and submitted for approval:  <i>Any change initiative project (that is, not business as usual changes) not covered by an existing or proposed VCGLR approval and which impacts the reporting of revenue to the VCGLR, must be provided to Crown's Regulatory and Compliance Department prior to implementation, to determine whether regulatory approval is required.</i>
Security	8 December 2009	To ensure the safety of Crown staff, contractors and visitors to the casino complex. To safeguard Crown's assets and property. To prevent and detect unacceptable behaviours within the casino complex and surrounds. To support all gaming activity conducted within the casino complex and other activities as required.	ICS reviewed. Change proposed.	The Security ICS is currently under review with the VCGLR and once settled, it is proposed that the following text will be inserted and the ICS resubmitted for approval:  <i>Any change initiative project (that is, not business as usual changes) not covered by an existing or proposed VCGLR approval and which impacts gaming operations, must be provided to Crown's Regulatory and Compliance Department prior to implementation, to determine whether regulatory approval is required.</i>
Junket and Premium Player Programs (including VIP Telephone Betting and the Introduction of Players)	24 December 2015	Ensure that Crown remains free of criminal influence and exploitation through the application of effective processes and the	ICS reviewed. Change proposed.	It is proposed that the following text will be inserted into the Junket and Premium Player Programs ICS and submitted for approval:  <i>Any gaming change initiative project (that is, not business as usual changes), not covered by an existing or proposed VCGLR approval, must be provided to Crown's Regulatory and Compliance Department prior to implementation, to determine</i>

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		maintenance of detailed and accurate documentation relating to Junket and Premium Player Program activity, the introduction of players and VIP International Telephone betting.		<i>whether regulatory approval is required.</i>
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