



Direct Line:  
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25 June 1 July 2021

### By email

Mr Craig Phillips  
Ms Abigail Gill  
Ms Kate Gill-Herdman  
The Solicitors Assisting the Royal Commission  
Into the Casino Operator and Licence  
Level 25, 567 Collins Street  
MELBOURNE VIC 3000

Dear Mr Phillips, Ms Gill and Ms Gill-Herdman

### Royal Commission into the Casino Operator and Licence

I refer to the three items requested by Counsel Assisting during the course of the hearing and my evidence on 21 June 2021. I have been asked to personally respond to the matters set out below:

1. At which Crown outlets, and which non-participating Crown outlets, Pokie credits can be used/ redeemed?
  - Pokie Credits can only be redeemed on gaming machines. Pokie Credits cannot be redeemed for cash and are non-transferable.
  - Crown Rewards points (Pokie points, Table points and Lifestyle points) can be converted to Pokie Credits.
  - Crown Rewards points (Lifestyle points) can be earned and [Crown Rewards Points \(Pokie points, Table points and Lifestyle points\)](#) redeemed at Crown and non-Crown owned outlets, please find **attached** with some restrictions as follows;
    - Prada does not allow earn or redeem of Crown Rewards points.
    - Luis Vuitton only accept Black and Platinum tier cards. This is a store policy and not a Crown restriction.
    - Village cinema earn and redeem is restricted to ticket purchase only and excludes candy bar and merchandise. This is a Village cinema policy not a Crown restriction.
    - Crown Gifts – redeeming points for gift cards can only occur via the member hub. Members can purchase gift cards with cash but cannot earn points on this transaction. All other purchases in store are eligible for earn and redeem.
    - Some Crown owned gaming floor bars allow earn only.
  
2. Whether Pokie credits obtained via certain loyalty program promotions can only be used/ redeemed on EGMs, and if so, which loyalty programs?
  - Pokie credits can only be used on gaming machines therefore all loyalty program promotions that issue a reward as Pokie credits are applicable, these include:
    - Matchplay;
    - Random Riches;
    - Lucky Time Jackpots (Consolation Prizes);
    - Pokie credit mail outs;
    - Welcome Back;




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- Pokie Credit Tickets.
3. When a return to player is calculated for purposes of section 115 of the *Casino Control Act 1991* (RTP), does Crown factor in any of the loyalty program expenses identified in CRW.512.156.2466? If so, please explain how those expenses are accounted for and whether that has resulted in Crown being in breach of the minimum RTP under section 115 (and if so, provide particulars of the extent of each such breach)?
- Crown does factor into the calculation for the purposes of complying with section 115 of the *Casino Control Act 1991* the loyalty program expenses identified in CRW.512.156.2466. These expenses are deducted in the calculation of gaming machine revenue and overall RTP. Furthermore, if these expenses were not deducted from the calculation of gaming machine revenue Crown would still not be in breach of the minimum RTP under section 115 as the overall RTP would be greater than 90%.
  - The RTP of gaming machines and associated jackpot parameters (Stand-alone progressives and linked progressives) are approved by the VCGLR, and the RTP variations are configured according to the parameters in the approval, which are above 87%. All loyalty program expenses are in addition to the game approved RTP variations.

Yours sincerely



**Mark Mackay**  
EGM Gaming Machines