



Regulatory & Governance Update February 2019

1. AUSTRAC

1.1. AUSTRAC Compliance Assessments

AUSTRAC has advised Crown that it will be conducting a Compliance Assessment in June 2019. This review will focus on the Crown Perth operations and will consider, amongst other matters:

- the contemplated Joint Program, which is currently with Minter Ellison for its independent review;
- the results of the AML/IT Project Team to automate various elements of the transaction monitoring program; and
- staff training initiatives.

A formal notice regarding the Compliance Assessment is expected from AUSTRAC in or about April 2019. In advance of the Assessment, the AML Team has commenced pulling together a file for both Melbourne and Perth addressing the three review areas.

Whilst this Assessment is to be largely focused on the Crown Perth operations, we should expect AUSTRAC to also plan an assessment on Crown Melbourne in due course.

1.2. AUSTRAC enquiry – Suncity

We have had no further correspondence with AUSTRAC on this matter.

1.3. FinTel Alliance

We have had no further correspondence with AUSTRAC on this matter.

1.4. AUSTRAC Reporting

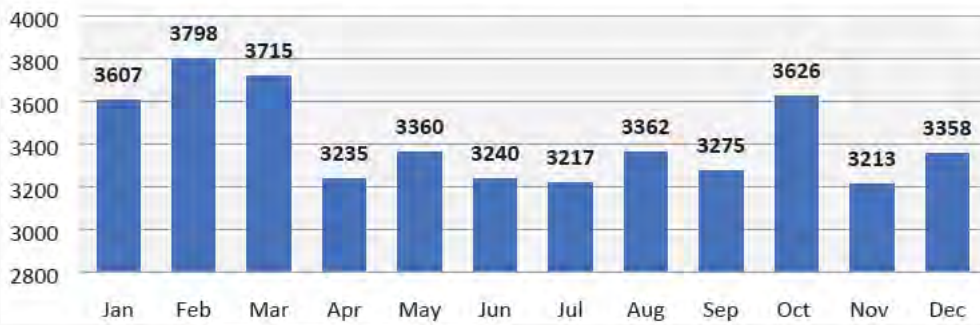
The following graphs show the number of Suspicious Matters Reports (**SMRs**), Threshold Transactions (**TTRs**) and International Funds Transfer Instructions (**IFTIs**) reported to AUSTRAC during the 2018 calendar year (reported by transaction date):



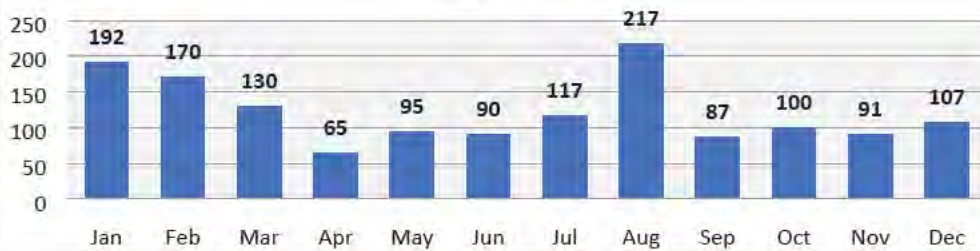
2018 - Suspicious Matter Reports



2018 - Threshold Transaction Reports

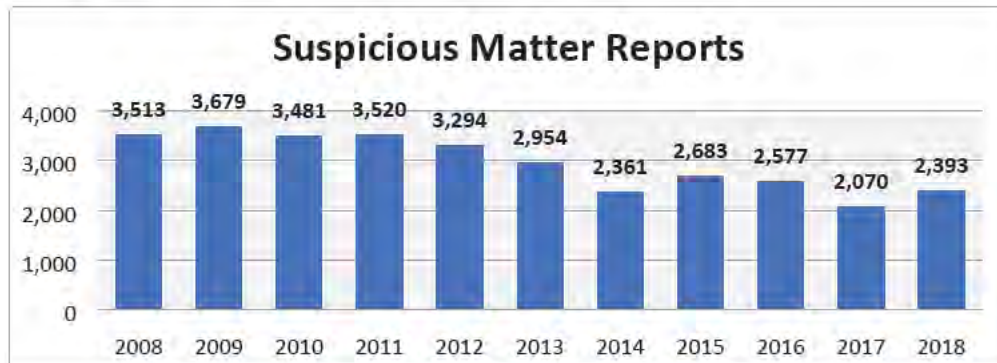


2018 - International Funds Transfer Instruction Reports





The following graphs show the yearly totals since 2008 of SMRs and TTRs lodged with AUSTRAC.



Changes to the reporting requirements for IFTIs occurred in October 2016. The following graph shows the yearly total number of IFTIs reported to AUSTRAC since 2016.



In respect of Crown Melbourne's AUSTRAC reporting obligations:

- the AML Team across both properties continues to check for customer onboarding issues (accuracy of details) when reviewing reportable transactions to AUSTRAC. To ensure our ongoing quality of reporting (and to prevent 'non-compliances' under the AML/CTF Program and AML/CTF Act/Rules), the AML



Team at both properties reviews all TTRs, IFTIs and SMRs and corrects data entry errors where identified in advance of uploading reports to AUSTRAC;

- the AML Team continues its verification review of IFTIs. Following a reminder to the business on 3 December 2018, the AML Team is seeing a marked improvement in the quality of information received from the VIP Team, with this information then submitted as part of our IFTI reporting processes;
- contemplated changes to Schema 1.2 were lodged with AUSTRAC Online by Crown Melbourne in January 2019 and are pending confirmation by AUSTRAC;
- any IT change impacting AML continues to be escalated for the approval of the Group General Manager – AML and the CIO;
- the end-to-end review of TTRs continues; and
- Crown Melbourne will be required to complete a Compliance Report in respect of its compliance to the *AML/CTF Act* in 2018. The reporting process is a legislative requirement and includes reporting on matters including our business, our customers, how we manage ML/TF risk and details of our Program.

1.5. Joint Program

The draft Joint Program is currently with MinterEllison for its independent review.

In discussion with AUSTRAC earlier this month, it has been foreshadowed that Crown and AUSTRAC will meet to discuss the Joint Program and its intended application (to seek AUSTRAC's guidance and feedback) prior to its final adoption.

The Joint Program will include feedback from the independent review of our Transaction Monitoring Program, which is also underway.

1.6. General AUSTRAC relationship

Crown Melbourne is scheduled to host an expected 36 participants of AUSTRAC's Financial Intelligence Analyst Course (or **FIAC**) in February 2019 to discuss casino operations and our AML Program. FIAC attendees include representatives of regulatory and law enforcement bodies (both State and Federal). We have had favourable feedback to date from previous attendees and we see this education role as a critical part of our ongoing relationship with AUSTRAC.

1.7. Legislative changes and other relevant information

1.7.1. Updates to the AML/CTF Act

No further update.



1.7.2. Updates to the AML/CTF Rules

No further update.

1.7.3. AUSTRAC Guidance Materials

In November 2018, AUSTRAC released a short video on the importance of suspicious matter reporting. This video is available at the following link:

<http://www.austrac.gov.au/suspicious-matter-reporting-video-animation>. The video was disseminated by the AML Team across the business, with excellent feedback received from various Business Units.

In December 2018, AUSTRAC released its risk assessment of on-course bookmakers, noting the ML/TF risk as “low”. The AML Team has reviewed the contents of the assessment and notes, in particular, AUSTRAC’s assessment that the risk posed by customers is lower due to the face-to-face nature of the transactional activity.

2. RISK MANAGEMENT

2.1. Update to the Risk Management Framework

As part of the review of the risk management framework, a number of steps have been taken to align the Perth and Melbourne processes, to mature the existing framework and enhance the quality of risk management across the organisation.

Some of the changes that have been implemented include the following:

- The Board Risk Appetite has been approved by all three boards (Crown Resorts Limited, Crown Melbourne Limited and Burswood Limited).
- Further enhancements to risk reporting at Board, Committee and Executive levels continue.

In relation to the enhancements of the risk framework, the most material developments since the last meeting in November 2018 is the initial engagement with an external consulting company to review the developments to date and ensure its relevance, in particular ensuring that no material elements are missing. This engagement will ensure compliance with the third recommendation from the VCGLR’s s25 report.

The scope of the review is currently being formulated, and the review should be completed in time for the Risk Management Strategy to be presented to the Committee and Board for approval in May.



Other framework elements are in development including a Data Risk Management Framework and a Business Continuity Management Framework.

2.2. Corporate Risk Profile Review

In reviewing the consolidated Risk Profile, the Executive team has suggested two changes:

- Adding a new risk: 'Breakdown in relationships with key government, legislative or regulatory bodies', with the following definition: Crown operates in many jurisdictions, and has to engage with a large number of government, legislative and regulatory bodies. A breakdown in these relationships could lead to targeted reviews, investigations, or actions by these bodies that could materially affect Crown's operations and reputation.
- Splitting the 'Responsible business model' risk into "Responsible Service of Gaming' and 'Responsible Service of Alcohol', as these two specific elements are individually material to the business, which is reflected in the governance structure and operational focus given to each topic.

The key events that have taken place over the period include:

- The Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) is still investigating allegations raised by Mr Andrew Wilkie MP in April 2018 regarding plastic picks being used on continuous play machines and multiple loyalty cards issued to patrons with respect of Crown Melbourne. The VCGLR has not indicated its position on these allegations at this stage. The Gaming & Wagering Commission of Western Australia is also considering these matters and their relevance to Crown Perth.
- The VCGLR is still investigating an issue related to an electronic gaming machine, which the VCGLR allege was identified by Gaming Inspectors as operating in 'Unrestricted Mode', without Your Play functionality activated. After an internal investigation, the EGM was confirmed as not operating in an unrestricted mode, however, it had a wiring fault, which meant that when a particular button was held down, it functioned as if it was imitating continuous play. Crown has responded to the VCGLR's Notice requesting the details of this issue. The VCGLR has not indicated its position at this stage.
- The VCGLR China investigation continues with further documentation continuing to be collated and provided. The VCGLR has indicated that it hopes to be in a position to provide Crown with a draft copy of its report shortly and it will invite Crown to make submissions on the draft prior to being finalised.
- A number of tax related matters are currently in dispute with the ATO, including the Cannery matter and a potential GST refund related to commissions paid to junkets.



- A change in Federal Government ministerial portfolios and leadership in August 2018 has required re-engagement with the relevant Government representatives to brief them on the relevance of the Black Economy Taskforce issues to Crown and the Casino industry.
- Local table games, Hotel and F&B are marginally below budget, and this is compounded by materially lower win rates in premium gaming, which had led to a forecast adjustment in December 2018 for both Melbourne and Perth.
- Provisions for international gaming bad debts remain relatively consistent with the last reporting period, and overall gross and net debtor balances are reducing.
- The Enterprise Agreement (EA) for Crown Melbourne Limited (CML) Table Games and Cage Area Managers 2015 is currently being negotiated. Although no notices of industrial action have been received, the risk remains heightened that some form industrial action could occur.
- The One Queensbridge Project remains in pre-planning phase, subject to financing. Application to extend the planning approval deadline is currently being considered by Government.

These events have not required risks or ratings to be changed in the corporate risk profile.

An updated Risk Map is provided in **Attachment 1** for discussion.

3. REGULATORY AND COMPLIANCE

3.1. Compliance Framework Status

As previously reported, a high level review of the governance frameworks identified the opportunity to operate a group compliance framework.

The implementation of a compliance framework in Crown Melbourne, based largely on the framework currently in Crown Perth, continues to progress. The framework will assist in ensuring consistency in compliance practices within Crown Melbourne and also aims to increase awareness and accountability of compliance obligations.

The status of the implementation of the compliance framework in Crown Melbourne is as follows.

The framework is consistent with ISO 19600:2015 “Compliance Management Systems – Guidelines”.



Business units that have been integrated to the business wide compliance framework to date include:

- AML/CTF
- Cage
- F&B (3 distinct sections)
- Finance
- Gaming Machines
- Gaming Machines Product
- Regulatory and Compliance (surveys deployed in November 2018)
- VIP International
- IT
- Marketing (Gaming and Non-Gaming) (integrated in the reporting period)
- Hotels
- Procurement
- Property Services
- Responsible Gaming
- Security
- Surveillance
- Table Games
- Human Resources (surveys deployed in November 2018)
- Gaming Machines Technical (integrated in the reporting period)

These departments have prepared and are completing monthly compliance surveys and reporting into the Compliance Committee.

Annual Compliance Plans for the above departments have also been drafted and finalised (with the exception of Marketing and HR, which are in progress) and signed by the Compliance Officers and relevant Executive General Managers/General Managers.

As previously reported, a Privacy Survey has been established in CURA, in line with Perth, which was issued to all departments in December 2018. The Health & Safety CrownSafe compliance survey continues to be developed.

During the next reporting period, it is expected that Annual Compliance Plans and compliance surveys will be finalised for the following departments:

- Events and Conferencing
- Legal
- Projects
- Showroom

In addition, the Requirements Register (which prioritises from a compliance perspective all regulatory and legislative requirements) is being reviewed in conjunction with the Risk and Audit Department.

Compliance surveys and Annual Compliance Plans for all departments will continue to evolve over time as a result of incidents, the legislative and regulatory environment and changing business practices.



3.2. Compliance and Regulatory Matters

3.2.1. Your Play

On 5 October 2018, the VCGLR wrote to Crown making enquiries of a preliminary nature, regarding the operation of the Your Play Pre-commitment Scheme at the Casino. The queries concerned multiple cards; active Your Play members; number of Casual Cards etc. and largely sought data, training and directions provided to staff and operational information; however, no allegations were made as to any wrong doing by Crown.

Crown responded to the VCGLR's letter on 26 October 2018, providing the information and data as requested.

The VCGLR has not provided any further update on the matter since receiving Crown's response.

3.2.2. China Matter

Crown provided a further tranche of requested documentation on 5 December 2018 and Crown and MinterEllison met with the VCGLR on 19 December 2018 to discuss the process and next steps. Subsequent to that meeting, a further letter was received from the VCGLR on 22 January 2019 requesting further details and seeking some points of clarification from Crown. It is expected that the VCGLR will shortly be finalising its draft report, which will be provided to Crown and Crown will be invited to make submissions.

There has been no progress with former China based staff member Jenny Jiang.

Discussions concerning Jason O'Connor's proposed return to work, which remains subject to any required regulatory approvals, are progressing well. Prior to gaining regulatory approval, it is proposed that Jason will return to work currently anticipated for 11 February 2019 in a role that does not require him to carry out duties that require licensing.

3.2.3. April/May 2018 Wilkie Allegations

There has been no progress on this matter since the previous update.

3.2.4. Poker Tax

The VCGLR claims that Crown is required to pay Gross Gaming Revenue (**GGR**) gaming tax on the entry fee component of poker tournaments held at Crown. Crown has disputed that entry fees are subject to gaming tax, primarily based on:

- For a number of years in times past, the Rules for Poker Tournaments, approved by the VCGLR, specifically provided that GGR did not apply to the entry fee;



- The ATO has declared that the entry fee component is 'not a gambling supply' and is therefore subject to GST;
- The fee does not fit the definition of GGR or gambling, in that there is no possibility of a return from paying the fee as it is not wagered; and
- The VCGLR has determined that poker tournaments where the buy-in is returned to players as prizes which are permitted outside the casino, are not subject to gambling regulation or a casino licence and are not subject to a gaming tax.

The VCGLR has raised the matter periodically over more than 11 years and on 2 May 2018 served Crown with a Notice pursuant to s26 of the *Casino Control Act 1991* (Vic) to provide certain data for an assessment to be made. Crown responded to the Notice providing the first of two large tranches of data covering 2014 to 2018.

A second tranche of data, covering the period 2010 to 2014 was subsequently provided and Crown advised the VCGLR that no further data was available for the years preceding 2010, as it had either been destroyed and/or it is now unreadable, as Crown no longer had the historic systems required to read it (note that Crown is only required by the *Casino Control Act* to keep data going back 7 years (8 years of data was provided)).

On 6 September 2018, the VCGLR again wrote to Crown querying the circumstances of the destroyed and unreadable data. In preparing the response to this letter, further detail was sought from the IT Department and an experienced employee who had recently returned to the relevant IT team was able to write code to extract further data going back to 2003. Crown subsequently wrote to the VCGLR explaining that further data had become available and that data was provided.

On 5 December 2018, the VCGLR (Chairman) again wrote to Crown, seeking detail as to what steps would be required to recover the unreadable data; what would be the cost of rebuilding the system and what amount of time would it require (it is notable that the period for which this information was sought was for between 16 and 22 years ago – the *Casino Control Act* requires the retention of the material for 7 years). The letter sought a further tranche of data (under s 26 Notice) (for the period since data was last provided) and required Crown Melbourne to commence reporting the taking of Poker Tournament Entry Fees in its usual Gross Gaming Revenue (**GGR**) report. Crown replied on 19 December 2018, providing all of the information requested – Entry Fees will be reported in the GGR report, but will not form part of the calculation. Crown has not yet received a response to its letter.

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3.2.5. EGM Continuous Play

On 27 September 2018, the VCGLR served Crown with a Notice pursuant to s26 of the *Casino Control Act 1991* (Vic) to answer questions and provide data concerning EGM



C8308, which the VCGLR allege was identified by Government Inspectors as operating in 'Unrestricted Mode', without YourPlay functionality activated. Crown investigated the machine with its Approved Testing Facility (ATF) (BMM) and the machine's manufacturer (IGT). It was identified that the machine was not operating in unrestricted mode, however, it had a wiring fault, which meant that when a particular button was held down, it performed as if continuous play was in operation. It should be noted that s62AB of the *Casino Control Act 1991* (Vic) provides:

(2) A casino operator must not allow a game to be played on a gaming machine unless each spin can be initiated only by a distinct and separate activation of the machine by the player (whether by pushing a play button, touching the screen or otherwise).

Crown responded to the Notice, advising that it was as a result of a machine hardware fault and also provided a copy of the manufacturer's report into the machine.

On 20 December 2018, the VCGLR wrote to Crown requesting clarification on several matters relating to this incident and an explanation as to why Crown breached s62AB(2) of the *Casino Control Act 1991* (Vic). On 8 January 2019, Crown responded to the letter, reinforcing its position as documented in Crown's initial response dated 11 October 2018. No reply has yet been received from the VCGLR.

As a consequence of this matter; on 19 November 2018 the VCGLR wrote to Crown advising that they are continuing to investigate the circumstances relating to the malfunction of EGM C8308. In this letter, the VCGLR sought further information from Crown as to whether regulation 18(6) of the *Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations 2014* have been complied with. On 18 December 2018, Crown responded asserting that no breach of Reg 18(6) had occurred and attaching the VCGLR's approval of the current operating format. No response has yet been received from the VCGLR.

As a result of this issue, various audits and reviews of similar machines have been undertaken.

3.2.6. Proposal to Restrict Cash Transactions

There has been no progress on this matter since the previous update.

4. RSG

4.1. Section 25 Review

Crown Melbourne is continuing to progress the implementation of the 11 Responsible Gaming Recommendations made by the VCGLR in its Section 25 Review. [Refer to Agenda Item 5.2 for an update on all recommendations.]



Following the Responsible Gaming Strategy Day conducted in October 2018, a draft Strategy has been prepared, and the Vision approved in principle:

'Crown Resorts will be an industry leader in delivering the gambling experience in a responsible environment.'

Final detailed information to support the Strategy is currently being developed.

4.2. Cross Property Self Exclusion

Following approval from the VCGLR and Department of Local Government, Sport and Cultural Industries (WA), on 1 January 2019, Crown Melbourne and Crown Perth commenced the mandatory cross property self exclusion process.

Additionally, Betfair Pty Ltd will cease promotion and marketing to Crown Melbourne and Crown Perth self excluded individuals.

4.3. Gaming and Responsible Gaming Interactions – Play Periods

Further to the update in the previous reports, where the Play Period process update was described, the Responsible Gaming department has continued to work with IT to develop a more operationally focussed dashboard using 'Splunk', and ultimately, an "Application" based alert and recording system that is expected to integrate with the existing recording database.

The Responsible Gaming department is now using the dashboard reporting with User Acceptance Testing continuing in order to refine the reporting as necessary.

4.4. Crown Model

The Crown Model trial is continuing. The Responsible Gaming team is currently working with the fifth data set of 100 members that has been provided by the Customer Analytics team. With each data set, data and operational refinements are being made. These are a product of the monthly meetings with the Customer Analytics and Responsible Gaming teams. There are some early indicators that some play or behaviour is changing with those that have had interactions, however, this should be treated with caution as the sample size is small at this stage and the nature of the model requires some time to pass for proper analysis.

4.5. Harm minimisation campaigns

4.5.1. Employee Awareness Campaign

A new Employee Awareness Campaign commenced at Crown Melbourne in December 2018. The campaign includes the rollout of the pocket-sized cards (see **Attachment 2**) containing information on Responsible Gaming for employees. The cards are now



handed out at employee Induction and at briefings and musters in December, followed by information in Frontline in January 2019.

4.5.2. Victorian Responsible Gambling Foundation (VRGF) '100 Day Challenge' campaign

Crown Melbourne is supporting the Victorian Responsible Gambling Foundation '100 Day Challenge' campaign. Launching on 1 January 2019, the campaign will encourage Victorians to reflect on their relationship with gambling, with a view to gambling responsibly and avoiding harm.

Crown Melbourne is supporting this via gaming floor bathroom posters, and information in the Responsible Gaming Support Centre and delivered by Responsible Gaming Liaison Officers.

4.6. Victorian Responsible Gambling Foundation

The VRGF Interim CEO, Janet Dore, visited Crown Melbourne on 12 December 2018 to meet with Crown Senior Management and for a tour and presentation on Responsible Gaming at Crown.

4.7. Responsible Gambling Ministerial Advisory Council (RGMAC)

At a meeting of the RGMAC on 12 December 2018, participants continued to consider a list of matters which should be included in Responsible Gambling Codes of Conduct for gaming venue operators.

The proposed features presented by RGMAC for Codes of Conduct would not currently affect Crown Melbourne.

Some of these features mirror a number of the suggestions made in the s25 Recommendations for Responsible Gaming at Crown Melbourne.

4.8. Internal Audit Activity

Crown Melbourne Internal Audit activity in this period consisted of spot audits completed by the Gaming Audit Team. A high level of compliance has been noted, with no significant issues requiring follow up.

4.9. Community Engagement Group

In September 2018, Prof. John Horvath, Barry Felstead, Ken Barton, Karl Bitar and Sonja Bauer met with Tim Costello, Stephen Mayne, Anna Bardsley and at their request, Susan Rennie to discuss, among other items, the establishment of a Community Engagement Group. Barry Felstead asked Anna Bardsley if she would be part of this Community Engagement Group and take the role of Chairperson, and for Anna to nominate further members for Crown's review.



Sonja Bauer subsequently met with Anna Bardsley in October 2018 to discuss her interest as Chairperson and to present a Confidential Draft of the Community Engagement Group Terms of Reference. Ms Bardsley undertook to provide her decision as to whether to be involved in the Group later in November 2018. To date, no correspondence has been received.

4.10. Responsible Gaming Advisory Panel

The Crown Resorts Responsible Gaming Board Committee has recommended the establishment of a Crown Resorts Responsible Gaming Advisory Panel. The role of the Advisory Panel is to provide information and advice to Crown Management in relation to Crown Resorts' responsible gaming programs and services and the monitoring and evaluation of these programs and services. Initially focussing on Crown Melbourne and Crown Perth, in due course the work of the Advisory Panel would encompass Crown Sydney.

In this respect, Barry Felstead has written to Prof. Alex Blaszczyński inviting him to join and Chair the Responsible Gaming Advisory Panel. This was followed by a meeting with Prof. Blaszczyński, Prof. John Horvath, Barry Felstead and Sonja Bauer in Sydney on 24 October 2018.

It is anticipated the discussions will be settled in early February 2019.

5. LEGAL

5.1. Car Parks

Crown Melbourne has transitioned from the temporary car park at Montague Street back to Clarke and Clarendon Street car parks and Vic Roads have now finished their works related to the Citylink/Tulla Widening Project at these car parks.

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5.2. IHG Trade Mark Matter

IHG (through Six Continents Hotels) is the owner of the CROWNE PLAZA trade mark and Crown Melbourne is the owner of the CROWN brand (as used by the Crown Resorts group and licensees). IHG and Crown are in dispute in relation to the respective use of the CROWNE PLAZA and CROWN brands for hotel services. The countries/jurisdictions of dispute include USA, UK, EU, Australia, Hong Kong, PRC (China), Taiwan and Macau. There are currently in excess of one hundred separate trade mark disputes before the various courts and tribunals around the world relating to this matter.

Previously the use was governed by a trade mark co-existence agreement that covered the Asia-Pacific region (excluding the Americas).

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5.3. Zantran Pty Ltd (Class action – Crown Resorts Limited)

Zantran Pty Ltd (Applicant) a shareholder in Crown Resorts Limited (Crown Resorts) has issued class action proceedings in the Federal Court against Crown Resorts.

The Applicant on behalf of other yet identified shareholders alleges that it has suffered loss and damage (fall in share price) arising out of and in consequence of Crown's operations in China during 2015 and up to the detention of Crown employees in China (Relevant Period).

It is further alleged that Crown Resorts during the Relevant Period failed to disclose to the share market information that was not generally available which a reasonable person would expect to have a material effect on the price or value of Crown Resorts shares. Such information included the risk of Crown's operations in China, the Chinese Government crackdown on corruption, the arrest in China of South Korean Casino



employees and the risk that employees might be detained and arrested in China for alleged breaches of Chinese gambling laws.

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Attachment 1
Crown Melbourne Corporate Risk Map – January 2019

		<i>Material Risks</i>				
Likelihood	Almost certain					
	Likely		16 - Harm to persons on property		14 - Major brand damage	
	Possible		9 - Loss of key management 15 - Poor people management practices	6 - External disruption to demand for our services 7 - Physical Business Disruption 8 - IT business disruption 11 - Litigation 12 - Major criminal activities 13 - Responsible Service of Gaming 18 - Industrial action 23 - Responsible Service of Alcohol	1 - Material breach of gaming and other relevant legislation /regulation 2 - Changes in key legislation or regulatory requirements 5 - Poor credit or investment decision 21 - Data misuse 22- Breakdown in relationship with key government, legislative or regulatory body	3 - Act of terrorism on Crown property 4 - Volatility of gaming revenue
	Unlikely		17 - Breakdown in strategic partnership with third party 19 - Unsustainable environmental management	10 - Reduction in property standards		
	Rare					20 - Aviation accident
		Insignificant	Minor	Moderate	Major	Severe
		Consequence				

Legend:

Critical Risk	Oversight by the RMC/Board
High Risk	Managed by CEO and relevant EGMs
Moderate Risk	Managed by BOT members
Low Risk	Managed as part of BAU



Attachment 2 Employee Awareness Campaign – Crown Melbourne

Frontline Cards:



RESPONSIBLE GAMING INFORMATION FOR EMPLOYEES

Pocket-sized cards now available

Recently, pocket-sized cards containing important information on Responsible

Gaming for employees at Crown have been distributed across the business.

The card lists the observable signs to be aware of and what to do if a patron is displaying these signs.

Remember, the Responsible Gaming Support Centre (RGSC) is located on Level B1, below the main food court, and is contactable 24/7 on 1800 801 098 or extension 5766.

Copies of the Responsible Gambling Code of Conduct are available [here](#), the RGSC, casino entrances, Cashier desks and Crown Rewards desks.

To find out more, [click here](#) or visit the Responsible Gaming site on Compass.

If you would like a copy of the card, please speak to your Manager.



OBSERVABLE SIGNS

Self-disclosure – self disclosure of a problem with gaming or request to self-exclude

Family concerns – requests for assistance from family and/or friends concerned about an individual's gaming behaviour

Unattended children – children left unattended whilst a parent/guardian gambles

Aggression – gets angry while gaming or shows signs of distress during or after gaming

Excessive time – often gambles for long periods without a break

Borrowing money – witnessed or heard that a customer was trying to borrow money for gaming

Changes in appearance – significant decline in appearance

Conflict – observed conflict over gaming between family or friends

Unrealistic – unrealistic remarks about gaming

Complaints/Blaming – complains to staff about losing or blames the casino or gaming product for losing

Secretive – secretive or embarrassed about being at the casino or stays on to gamble when friends leave the venue

Avoidance – gambles without reacting to what is going on around them and avoids contact or conversation with others

ATM – frequent visits to the ATM