



# Crown Resorts Limited Human Rights Policy

Crown Resorts Limited ACN 125 709 953

## Table of Contents

Page

---

1. Document Control	1
2. Definitions	2
3. Policy Overview	3
4. Policy	4
5. Roles & Responsibilities	7
6. Policy Review and Approval	7
7. Feedback and Questions	7
8. Relevant Legislation, Regulations and other Guidance Documents	8
9. Relevant Crown Policies and Documents	8
Appendix A: Version Control	9

## 1. Document Control

<b>Policy Title</b>	Crown Resorts Limited – Human Rights Policy
<b>Policy Owner</b>	Rishi Tirupari, Group Executive General Manager ESG
<b>Accountable Executive</b>	Danielle Keighery, Chief Corporate Affairs & Brand Officer
<b>Summary</b>	Crown’s Policy relating to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights.
<b>Effective Date</b>	23 August 2023
<b>Last Review Date</b>	June 2023
<b>Next Review Date</b>	July 2024
<b>Approved by</b>	Crown Resorts Limited Board

## 2. Definitions

**Business Client** means any person or legal entity that is an actual or prospective purchaser of either services or products of Crown Resorts

**Crown** means Crown Resorts and the companies described in the Crown Group.

**Crown Group** means the following majority owned Australian subsidiaries of Crown Resorts and any related body corporate:

- (a) Crown Melbourne Limited (**Crown Melbourne**);
- (b) Burswood Nominees Limited (**Crown Perth**);
- (c) Crown Sydney Gaming Pty Ltd and Crown Sydney Property Pty Ltd (collectively, **Crown Sydney**).

**Crown Resorts** means Crown Resorts Limited (ACN 125 709 953).

**Modern Slavery** is as defined in the *Modern Slavery Act 2018* (Cth).

**Modern Slavery Act** means the *Modern Slavery Act 2018* (Cth).

**Supplier** refers to any person/business that provides goods and/or services to Crown.

**Team Member** means any person performing duties on behalf of Crown, whether directly employed or contracted by Crown and includes directors and officers and permanent, fixed-term, temporary, volunteer, full-time, part-time and casual employees of Crown or agency workers.

### 3. Policy Overview

#### 3.1 Purpose of Policy

The purpose of this policy is to articulate Crown’s approach to human rights and how Crown demonstrates its commitment to respect human rights in accordance with the *United Nations Guiding Principles on Business and Human Rights*. Crown acknowledges its obligation to prevent or mitigate adverse human rights impacts in its operations and supply chain and remediate where harm is caused.

#### 3.2 Scope and Application of Policy

This policy applies to everyone who works for Crown, including directors, officers, team members, consultants, agents and suppliers who work for, or with, Crown Resorts.

#### 3.3 Policy Alignment to Crown Code of Conduct and Values

This policy has been written to align to the Crown Values, and with the intent to promote the behaviours and mindsets that will embed our aspirational culture. The table below summarises some of the key areas of alignment for this policy.

Value	Alignment
We act with integrity	<ul style="list-style-type: none"><li>○ This policy prescribes key requirements in regard to Crown’s obligation to prevent or mitigate adverse human rights impacts in its operations and supply chain and remediate where harm is caused</li></ul>
We care	<ul style="list-style-type: none"><li>○ This policy prescribes key requirements that demonstrates Crown cares about the community and is active at preventing or mitigating adverse human rights impacts in its operations and supply chain and remediate where harm is caused</li></ul>
We work together	<ul style="list-style-type: none"><li>○ This policy prescribes key requirements to respect all human rights, including labour rights</li></ul>
We strive for excellence	<ul style="list-style-type: none"><li>○ This policy prescribes key requirements where Crown believes it can mitigate risks, prevent harm or support better outcomes for its stakeholders</li></ul>

## 4. Policy

### 4.1 Background

Crown has identified the following human rights issues where Crown believes it can mitigate risks, prevent harm or support better outcomes for its Team Members, guests, suppliers and other communities: modern slavery, labour rights, health and safety, equality and discrimination and Indigenous rights.

Crown believes human rights apply to everyone. We understand human rights by reference to minimum international standards while complying with all local laws in the jurisdictions in which Crown operates.

For Crown, human rights include the core internationally recognised human rights as contained in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights; *United Nations Declaration on the Rights of Indigenous Peoples* and the International Covenant on Economic, Social and Cultural Rights), coupled with the principles concerning fundamental rights as set out in the Declaration on Fundamental Principles and Rights at Work.

Crown also recognises that respect for human rights is connected with other enabling factors, including preventing bribery and corruption, compliance with anti-money laundering and counter-terrorism financing obligations and operating sustainably.

### 4.2 Policy Requirements

#### 4.2.1 Modern slavery

Crown understands the moral and legal obligations it has to identify and address the risks of modern slavery within its operations, its supply chain and other business relationships.

Crown has implemented modern slavery risk identification processes and procedures to detect and assess modern slavery risks in its operations and supply chain. Crown has a documented remediation process in the event modern slavery practices are identified in its supply chains, operations or business relationships, that leads with a people-first, rights-based approach.

Crown prepares and publishes an annual Modern Slavery Statement which is approved by the Crown Resorts Ltd Board of Directors in accordance with the Modern Slavery Act.

To support further understanding of modern slavery risk, relevant team members are required to undertake modern slavery training on an annual basis to broaden awareness on how to identify and report modern slavery risks.

#### *Our Focus*

- Modern slavery identification and assessment. Crown is committed to the identification and assessment of human rights risks across its operations and supply chain. Crown will continue to review its policies and processes to enhance identification of human rights risks.

- Capability building. Crown is committed to building on its existing training programs to enhance and embed regular human rights training at all levels of the business and for critical stakeholders like Crown’s suppliers.

#### 4.2.2 Labour rights

Crown is committed to ensuring labour rights in both its operations and supply chain are upheld.

Crown is a significant employer with an extensive supply chain. As a business, the relationship Crown has with team member and suppliers is of paramount importance.

##### *Our Focus*

- Protecting our people. Crown is committed to protecting its direct team member by ensuring that the fundamental labour principles and rights at work are met.
- Protecting workers in our supply chain. Crown is committed to identifying and addressing the risk of modern slavery practices including forced labour in its direct supply chain.

#### 4.2.3 Health and safety

Crown is committed to respecting health and safety rights in its operations and supply chain.

Crown is committed to ensuring that its team member work in safe environments and that Crown’s suppliers commit to the same work health and safety standards.

##### *Our Focus*

- Protecting our people. Crown is committed to protecting the mental and physical health of its team member.
- Protecting against human trafficking. Crown is committed to supporting the detection and reporting of suspected human trafficking at its properties.

#### 4.2.4 Protecting our guests

Crown is committed to delivering the gaming experience in a safe environment via our Crown PlaySafe program. Crown PlaySafe is built on principles of player wellbeing, care and safety with harm minimisation at its core.

##### *Our Focus*

- Prevention and safe play – Crown is committed to ensuring our gambling products and safety programs incorporate design principles from successful prevention and harm reduction strategies.
- Safe gambling culture with care for the community – Crown is committed to working in partnership with government and our regulators, education providers, businesses and industry, and community-based organisations to deliver a culturally relevant approach to preventing gambling harm.
- Safe gambling environment, with support for vulnerable or at-risk players – Crown is committed to combining technology and data to implement gambling safety features to identify early signs of gambling harm and educate guests to play safely.
- Continual improvement of understanding of player behaviour to create a safe gambling system – Crown is committed to investing in research and data monitoring to design positive and safe player experiences.

#### 4.2.5 Equality and discrimination

Crown is committed to respecting the right to equality and non-discrimination. Crown's approach to diversity and inclusion is embedded in its policies and programs.

##### *Our Focus*

- Preventing discrimination: Crown does not tolerate behaviour which could be perceived as discrimination in any form. In Crown's day-to-day business and operations, or its engagement with partners, suppliers and other stakeholders we are committed to take actions to promote a culture of respect for human rights, with equal opportunities for all.
- Encouraging diversity in our people: Crown is committed to fostering a diverse and workplace and will seek to provide employment opportunities for disadvantaged and under-represented segments of the communities we work with.

#### 4.2.6 Indigenous rights

Crown respects the rights of First Nations people and has a practical approach to partnering with First Nations people in building relationships, respecting cultures and creating opportunities.

##### *Our Focus*

- Encouraging Indigenous employment. Crown is committed to making a positive impact on the lives of First Nations peoples in Australia through its focus on hiring, developing and retaining Indigenous team member.
- Promoting First Nations culture. Crown is committed to reconciliation and acknowledges our responsibility to respect and support First Nations peoples in our workforce, supply chain and communities.

### **4.3 Policy Requirements Monitoring**

Crown is committed to implementing appropriate due diligence processes across its business to support key commitments. Crown's approach to human rights due diligence is to first understand and identify risk to people and then to improve systems and processes to assess, address, monitor and report on potential adverse human rights impacts.

### **4.4 Grievance Mechanism and remediation**

Crown is committed to listening. Crown will take allegations and evidence of adverse human rights impacts seriously.

Team Members are encouraged to report any human rights related concerns that arise, including if they suspect adverse human rights impacts may occur or have occurred.

Crown is committed to developing its approach to remediation of adverse human rights impacts to involve and reflect the needs of rights-holders.

Crown has a dedicated channel for team members, suppliers and those Crown works with in the community to raise concerns, including human rights related concerns. Crown's Whistleblower Policy should be referred to in these instances.

#### 4.5 Potential Breach Consequences

Any perceived breach of this policy should be referred to the Compliance and Regulatory Affairs Team.

## 5. Roles & Responsibilities

Title	Role and Responsibilities
<b>All Team members</b>	<ul style="list-style-type: none"><li>● Understand and comply with the requirements of this Policy.</li><li>● Complete any training required to support the principles of this Policy.</li></ul>
<b>Environmental, Social and Governance Team</b>	<ul style="list-style-type: none"><li>● Responsible for the development of the Modern Slavery Statement</li></ul>
<b>People and Culture Team</b>	<ul style="list-style-type: none"><li>● Responsible for assessing and addressing human rights risks as they relate to team members.</li></ul>
<b>Procurement Team</b>	<ul style="list-style-type: none"><li>● Responsible for assessing and addressing human rights risks as they relate to Crown's supply chain.</li></ul>

## 6. Policy Review and Approval

This Policy will be reviewed by the Policy Owner on an annual, or as close to frequency as practicable, or as required, to take account of any regulatory or legislative requirements.

Changes required to this Policy will be approved by the Crown Resorts Board. Prior to approval by the Crown Resorts Board this Policy will be submitted to the Property Risk, Compliance & Responsible Gaming Committees and the boards of each subsidiary Property for consideration and endorsement.

Minor administrative updates and amendments may be approved by the Policy Owner.

Minor administrative updates and amendments may be approved by the Policy Owner.

## 7. Feedback and Questions

Crown team member may provide feedback or ask any questions about this document by contacting the Policy Owner.

## 8. Relevant Legislation, Regulations and other Guidance Documents

Document Title	Section
<i>Casino Control Act 1992 (NSW)</i>	Section 64A
Declaration on Fundamental Principles and Rights at Work	
International Covenant on Civil and Political Rights	
International Covenant on Economic, Social and Cultural Rights	
<i>Modern Slavery Act 2018 (Cth)</i>	Sections 5, 14 & 16
Universal Declaration of Human Rights	
United Nations Declaration on the Rights of Indigenous Peoples	
United Nations Guiding Principles on Business and Human Rights	
<i>Workplace Gender Equality Act 2012 (Cth)</i>	

## 9. Relevant Crown Policies and Documents

Document Title
<ul style="list-style-type: none"> <li>• Crown Code of Conduct</li> <li>• Equity, Diversity and Inclusion Policy</li> <li>• Health, Safety and Wellbeing Policy</li> <li>• Procurement and Supply Chain Policy</li> <li>• Supplier Code of Conduct</li> <li>• Whistleblower Policy</li> </ul>

*This Policy and any other material or information related to or connected with this Policy is the property of Crown Resorts and must be used for internal purposes only in the interest of and related to Crown Resorts.*

*All such information is strictly confidential and may be subject to legal professional privilege.*

*You must not distribute or disclose this Policy any other material or information related to or connected with this Policy unless authorised by Crown Resorts or required by law.*

*Any unauthorised use is unlawful and may result in disciplinary action and legal action being taken.*

*Crown reserves the right to amend, cancel or extend policies. All policies filed to the Crown Website/intranet are current. If you are referring to a hard copy, please ensure it is the most recent version.*

**Crown Resorts Limited**  
August 2023

## Appendix A: Version Control

### Document History

Version	Date	Modified by	Comments
2.0	July 2023	Angelina Bowden-Jones, Group General Manager, ESG	Update Human Rights requirements to previous Modern Slavery Policy.

1