

Crown Resorts Ltd Modern Slavery Statement 2022







Contents

Acknowledgment of Country	4
Message from the Crown Resorts Chairman	5
About this Statement	6
Our Purpose and Values	8
About the Code of Conduct	8
Crown's approach to Human Rights and Modern Slavery	11
Structure, Operations and Supply Chain	12
Modern Slavery Risk in Crown's Operations	16
Our Past and Future Actions	22
Modern Slavery: Governance & Strategies	24
Assessing the Effectiveness of Actions	32

Acknowledgment of Country

We recognise and acknowledge the existing, original, and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands and waterways across the Australian continent and to the land on which our resorts are located.

We pay our respects to their Elders past and present, the Gadigal of the Eora Nation, Wurundjeri and Bunurong of the Kulin Nation, and Noongar on Whadjuk Country.

At Crown, we are enriched by Aboriginal and Torres Strait Islander peoples' contribution to our organisation, and we commit to working with you to build a prosperous and inclusive Australia.



Message from the Crown Resorts Chairman

Crown Resorts presents its Modern Slavery Statement for the reporting period 1 July 2021 through to 30 June 2022.

In the 2022 reporting year, Crown has progressed a number of priorities identified in 2021. This includes:

- The establishment of a Modern Slavery Remediation Framework and the early development of processes to help identify modern slavery in our supply chain, which is expected to be finalised in 2023.
- The expansion of our commitment to modern slavery and overall risk management frameworks, including our Human Rights Policy, Procurement and Supply Chain Policy and Supplier Code of Conduct.
- The development of a Human Rights and Modern Slavery training program, which has been rolled out across our procurement team, with more to come.

We have a vital role to play in the communities in which we operate and are committed to driving positive change and impact with respect to our social licence.

Crown will continue to focus on building awareness of modern slavery risk in its operations and supply chain as well as strengthening the capability of our organisation to be a world leader in the delivery of safe and responsible gaming and entertainment.

Yours sincerely,

William P. McBeath

William P. McBeath

Chairman
Crown Resorts Limited



About this Statement

Crown Resorts Limited has prepared this Statement in accordance with the Modern Slavery Act 2018 (Cth) (Act) and describes the steps taken by Crown Resorts Limited in all areas of Crown Resorts Ltd and its controlled entities (*Crown*) to manage the risks associated with modern slavery in its operations and supply chains during the reporting period, unless otherwise stated.

This is the first Modern Slavery Statement for Crown under new ownership. On 24 June 2022, Crown Resorts Ltd was acquired by Blackstone and is no longer publicly listed on the Australian Securities Exchange.

The entities included in the 2022 Modern Slavery Statement are consistent with those included in Crown's 2021 Modern Slavery Statement and cover Crown's activities over the financial year ending 30 June 2022.

It has been prepared to:

- comply with the Modern Slavery Act 2018 (Cth) and
- meet the mandatory criteria structure as outlined in the Act and the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

The reporting entity, Crown Resorts Limited, was acquired by SS Silver Pty Ltd, an entity owned by funds managed or advised by Blackstone Inc and its affiliates (Blackstone) on 24 June 2022. Previously, Crown was a public company listed on the Australian Securities Exchange. This joint statement covers Crown Resorts Limited and the following Crown Group reporting entities (together referred to as we, us, our, Group or Crown):

- Crown Resorts Limited
- Crown Entertainment Group Holdings Pty Ltd
- Crown Melbourne Limited
- Burswood Property Trust
(Trustee: *Burswood Nominees Limited*)
- Crown (Western Australia) Pty Limited
- Burswood Limited
- Betfair Pty Ltd
- Betfair Australasia Pty Ltd (*immediate parent of Betfair Pty Ltd*)
- Jemtex Pty Ltd (*immediate parent of Betfair Australasia Pty Ltd*)
- Crown Asia Investments Pty Ltd (*Revenue > \$100m, noting it is all intercompany revenue*)
- Crown CCR Group Holdings One Pty Ltd (*parent of Crown Asia Investments Pty Ltd*)

Each reporting entity, other than Crown Resorts Ltd, is a wholly-owned subsidiary of Crown Resorts Ltd. Crown Entertainment Group Holdings Pty Ltd and Crown (Western Australia) Pty Limited are intermediary holding companies between Crown Resorts Ltd and one or more reporting entities.

- Crown Melbourne Limited owns and operates the Crown Melbourne Entertainment Complex (*Crown Melbourne*).
- Burswood Nominees Ltd owns and operates the Crown Perth Entertainment Complex (*Crown Perth*).
- Crown Sydney is owned and operated by Crown Sydney Property Pty Ltd and Crown Sydney Gaming Pty Ltd.

Consultation with owned and controlled entities

Crown is committed to ensuring that our approach to modern slavery is standardised across each of Crown's reporting entities. To drive consistency in awareness and a common approach to improving controls, a working group is an effective mechanism and a conduit for consultation with and amongst owned and controlled entities. The identification, assessment and management of modern slavery risks as outlined in this Statement remain within the business units.

The cross-functional working group is chaired by Crown's Chief Risk Officer with representatives from Procurement & Supply Chain, People & Culture, Environment Social & Governance, Legal, Corporate Affairs and Internal Audit providing full coverage for Crown Group operations, with the inclusion of Betfair. As our approach to modern slavery matures, we envision the group will broaden to represent key front-line business units. Crown will continue to consult with the aforementioned entities and will progressively enhance the risk assessments across these entities over future reporting periods. Crown Aspinalls in London publishes a stand-alone Modern Slavery Statement under the Modern Slavery Act 2015 (UK).



Our Purpose and Values

At Crown, we have always been about creating exceptional, world-class experiences for our customers and our purpose is simple.

“Together, we create exceptional experiences with respect and care for our communities.”

However, a purpose on its own is not enough. We also need values to express what we stand for and guide the way we do things.

Our values are core to our business, and we align everything we do with them.

These are the values we stand for – the values by which we measure all our actions.

Aligned with those core values, we acknowledge that being one of Australia’s largest hospitality providers we have an obligation to prevent and mitigate adverse human rights impacts in our operations and supply chain, and remediate when harm is caused.

Crown expects those who work for and with Crown to act in accordance with these values.



We act with integrity



- When we make decisions, we take time to consider our values, and the risks to our communities and Crown
- We are honest and transparent when interacting with everyone
- We follow the spirit of our rules, code of conduct, and the laws and regulations that govern us
- We speak up when we see the wrong thing happening or have something to contribute
- We respond respectfully and are receptive to people speaking up
- We trust and empower people closest to the decision to make the decision
- We ask ourselves and others the hard questions with empathy
- We act responsibly, take accountability for our actions, and admit our mistakes and shortcomings
- We ask 'should we' not just 'can we'

We work together



- We collaborate with each other, our customers, and our communities in pursuit of our common goals
- We communicate and work effectively across teams to unlock greater potential
- We balance the interests of others with our personal goals
- We seek out different perspectives to inform our decisions and make those people feel heard
- We share our knowledge and lessons learnt from our mistakes
- We welcome and include people different from ourselves in race, age, gender identification, sexual orientation and abilities to create a sense of belonging
- We celebrate and enhance each other's work through constructive feedback

We care



- We nurture authentic relationships based on respect
- We look after and support those in our communities
- We take the time to listen and understand the perspective of others
- We acknowledge and have concerns for people's wellbeing, health and safety
- We choose what is right for our communities
- We go further to bring out the best in others

We strive for excellence



- We show passion when creating exceptional experiences
- We pursue opportunities that exceed expectations
- We recognise and celebrate those who demonstrate excellence
- We pursue creativity and innovation to grow
- We look outward to continuously improve
- We assume there is always a solution and don't give up until we find it



Crown's approach to Human Rights and Modern Slavery

As a global issue requiring immediate attention, from which no country is immune, Crown respects human rights and commits to seeking to identify and rectify modern slavery in its operations and supply chain.

Crown believes that human rights apply to everyone. We are committed to ensuring that through our operations we respect and uphold human rights as set out in the International Bill of Human Rights; International Labour Organisation Declaration on Fundamental Principles; and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

Respecting human rights is aligned with our efforts on anti-bribery and corruption, anti-money laundering and counter terrorism financing and environmental sustainability. Crown considers this intersection of risk as part of its AML/CTF and Financial Crime program of work.

Modern slavery includes trafficking in persons, slavery, slavery-like practices (including forced labour and forced marriage) and the worst forms of child labour.

Crown acknowledges its responsibility to identify and address behaviours and practices constituting modern slavery practices as defined in the Act. The Crown Board approved the Human Rights Policy that came into effect in September 2020.

Structure, Operations and Supply Chain

Structure

Crown Resorts Limited was acquired by SS Silver Pty Ltd, an entity owned by funds managed or advised by Blackstone Inc and its affiliates (Blackstone) on 24 June 2022.

For most of the reporting period for this statement, Crown was a public company listed on the Australian Securities Exchange. To assist in carrying out its responsibilities, during the reporting period, the Crown Board had the following standing committees:

- Audit and Corporate Governance Committee
- People, Remuneration and Nomination Committee
- Safety and Sustainability Committee
- Responsible Gaming Committee
- Risk Management Committee

Following the acquisition of Crown by SS Silver Pty Ltd, the Crown Board established Audit and Risk Committees for Crown Sydney and Crown Perth, in addition to the already established Audit and Risk Committee for Crown Melbourne. These committees are responsible for the oversight of Crown's modern slavery risks and are ultimately accountable to the Crown Resorts Risk Committee and Crown Board.

Crown Group Employees FY2022

Crown Resorts	12,776 (including 2,017 casual employees)
Aspinalls (UK)	170
Betfair	123

Crown Group Revenue by Jurisdiction FY2022

Australia	AUD 1,883 million (97% of total revenue)
UK	AUD 13.9 million (1% of total revenue)
Other	AUD 38.3 million (2% of total revenue)
Total	AUD 1,935.2 million

Operations

Crown is one of Australia's largest entertainment groups with its core businesses and investments in the integrated resorts sector.

In Australia, Crown owns and operates three of Australia's leading integrated resorts – Crown Melbourne, Crown Perth, and Crown Sydney. As one of Australia's largest hospitality and tourism employers, Crown Melbourne and Crown Perth are the largest single-site private sector employers in both Victoria and Western Australia, respectively.

Crown makes a major contribution to the Australian economy through its role in tourism, employment, and training and through its corporate responsibility programs.

During the reporting period, approximately 97% of Crown's revenue was generated from its Australian operations.

Domestic Operations

Crown Melbourne Limited owns and operates the Crown Melbourne Entertainment Complex (Crown Melbourne).

Crown Melbourne is Australia's leading integrated resort, featuring luxury accommodation and award-winning dining, world-class gaming, conferencing, shopping, and entertainment facilities.

Burswood Nominees Ltd owns and operates the Crown Perth Entertainment Complex (Crown Perth).

Crown Perth is one of Western Australia's largest tourist destinations, featuring three hotels, world-class convention and gaming facilities, restaurants and bars, a 2,300-seat theatre, and shopping and entertainment facilities.

Crown Sydney commenced progressive opening of non-gaming facilities in Barangaroo on 28 December 2020. Crown Sydney features 349 hotel rooms and suites, luxury residences, signature restaurants, bars, luxury retail outlets, pool and spa facilities and conference rooms.

Online operations

Crown's wagering and online social gaming operations comprises Betfair Australasia, a 100% owned online betting exchange, and DGN Games,

a 100% owned online social gaming business. DGN Games has approximately 30 employees located across Israel and the United States.

Betfair is Australia's largest betting exchange – an online, peer-to-peer wagering platform that services Australian and New Zealand customers. Betfair's customers can bet against other customers, both locally and internationally. At the end of the reporting period, Betfair had approximately 120 employees located in Australia.

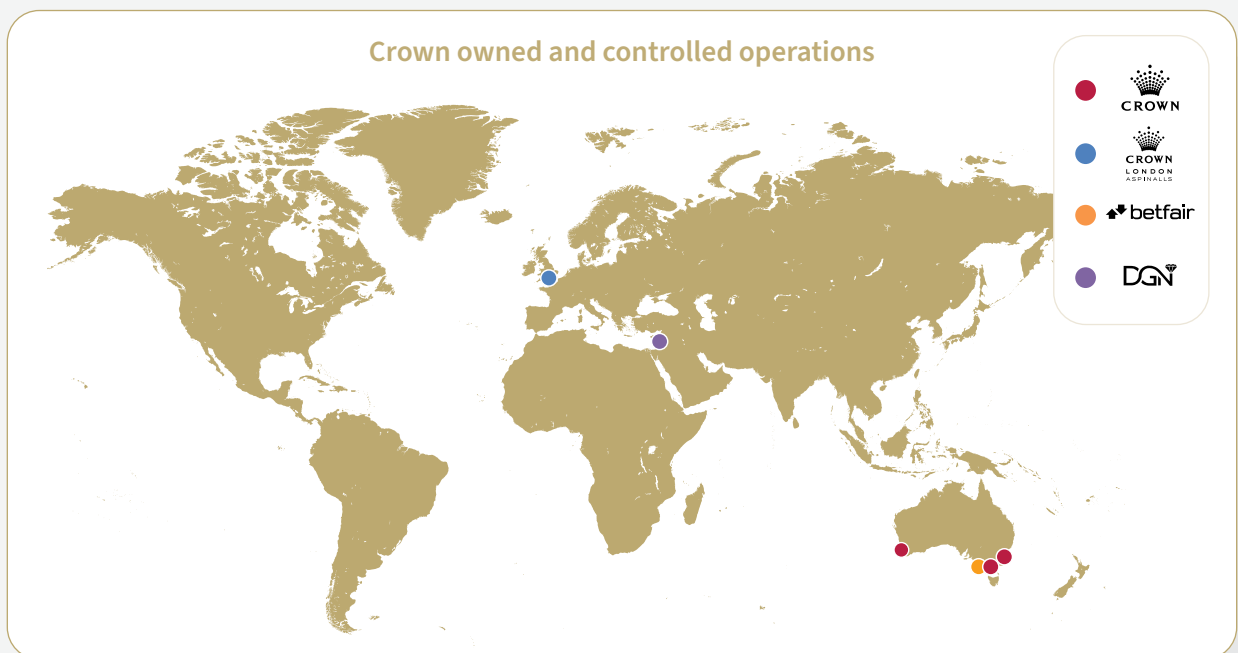
Overseas

Crown owns and operates Crown Aspinalls in London, one of the high-end licensed casinos in the West End entertainment district. At the end of the reporting period, Crown Aspinalls had approximately 170 employees located in London.

Other interests

Crown's other interests include the following:

1. 50% equity interest in Aspers Group, a UK-based regional casino operator,
2. 50% equity interest in Chill Gaming, a joint venture focused on innovation and developing new entertainment products, and
3. 20% interest in Nobu, the lifestyle hotel and restaurant brand.



Supply Chain

During the reporting period, Crown's Australian-owned and controlled operations procured approximately \$1.6 billion of goods and services from approximately 8,000 suppliers. In the same period, Betfair spend on external suppliers was approximately \$70 million amongst 268 suppliers.

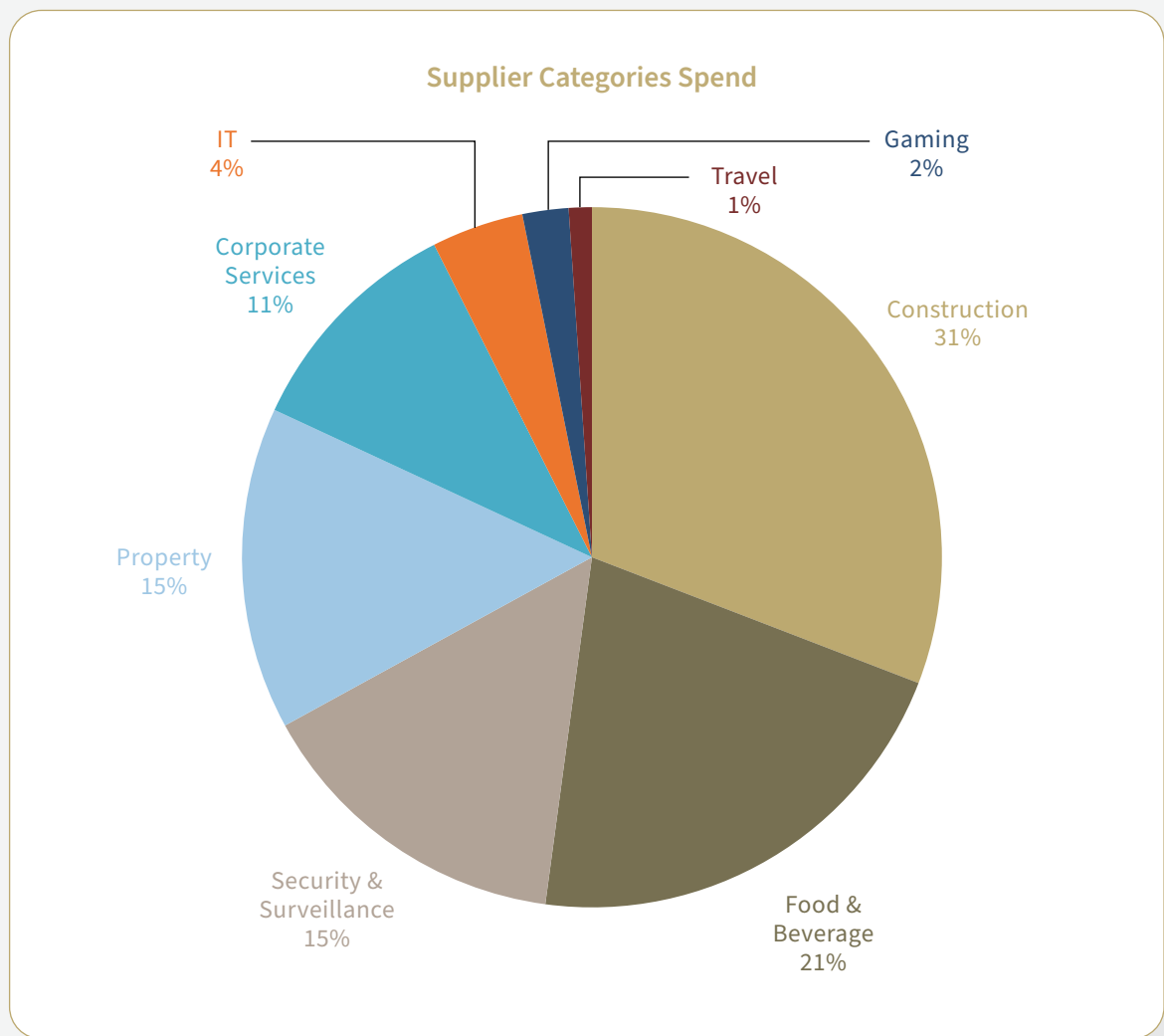
Approximately 97% of total spend from Crown's Australian-owned and controlled operations during the reporting period was with direct Tier 1 suppliers (suppliers we procure from directly) located in Australia and pertained to Crown Resorts' operations.

Crown acknowledges that its direct suppliers may have operations in, or may source goods or services from, jurisdictions which may have a higher risk for modern slavery.

The categories of goods and services procured by Crown Resorts during the reporting period were construction, food and beverage, security and surveillance, property, corporate services, IT, gaming and travel.

Specific to Betfair, 95% of the Betfair spend was allocated to corporate services, and 5% on Gaming.

Compared with the prior reporting period, whilst Crown's overall spend with suppliers increased as the properties reopened after the extended shutdowns due to COVID-19, there was marginal change in the spend allocation on Australian local suppliers and spend allocation by category for Crown's Australian-owned and controlled operations.





Modern Slavery Risk in Crown's Operations

Risk Identification process

Following the introduction of the Modern Slavery Act (2019), Crown reviewed its internal policies, procedures and processes to identify and assess modern slavery risks within its operation and supply chain. In addition to the internal review, Crown engaged an external specialist human rights and impact adviser to undertake a risk identification process.

These reviews considered the broader scope of human rights issues connected to or indicative of modern slavery risk, including employee and contractor rights to fair pay and entitlements, safe working conditions and equality and diversity. The vast majority of Crown's employees are based in Australia, with employment arrangements regulated by the Fair Work Act 2009 (Cth) and relevant modern awards.

These reviews informed Crown's assessment at the time that modern slavery risks associated with our supply chain are more significant than risks within our own operations and workplaces. Although there is no change to Crown's assessment on modern slavery risk, this will be considered in future third-party risk assessments within Crown's operations, whilst we continue to monitor our modern slavery risks holistically.

Segmentation of supplier per risk factors

Identification process

Using the same methodology applied at the commencement of Crown's Modern Slavery program, Crown's supplier population is segmented using four factors:

1. High Risk geographies
2. Vulnerable populations
3. High Product and Services' risk categories
4. High Risk business model

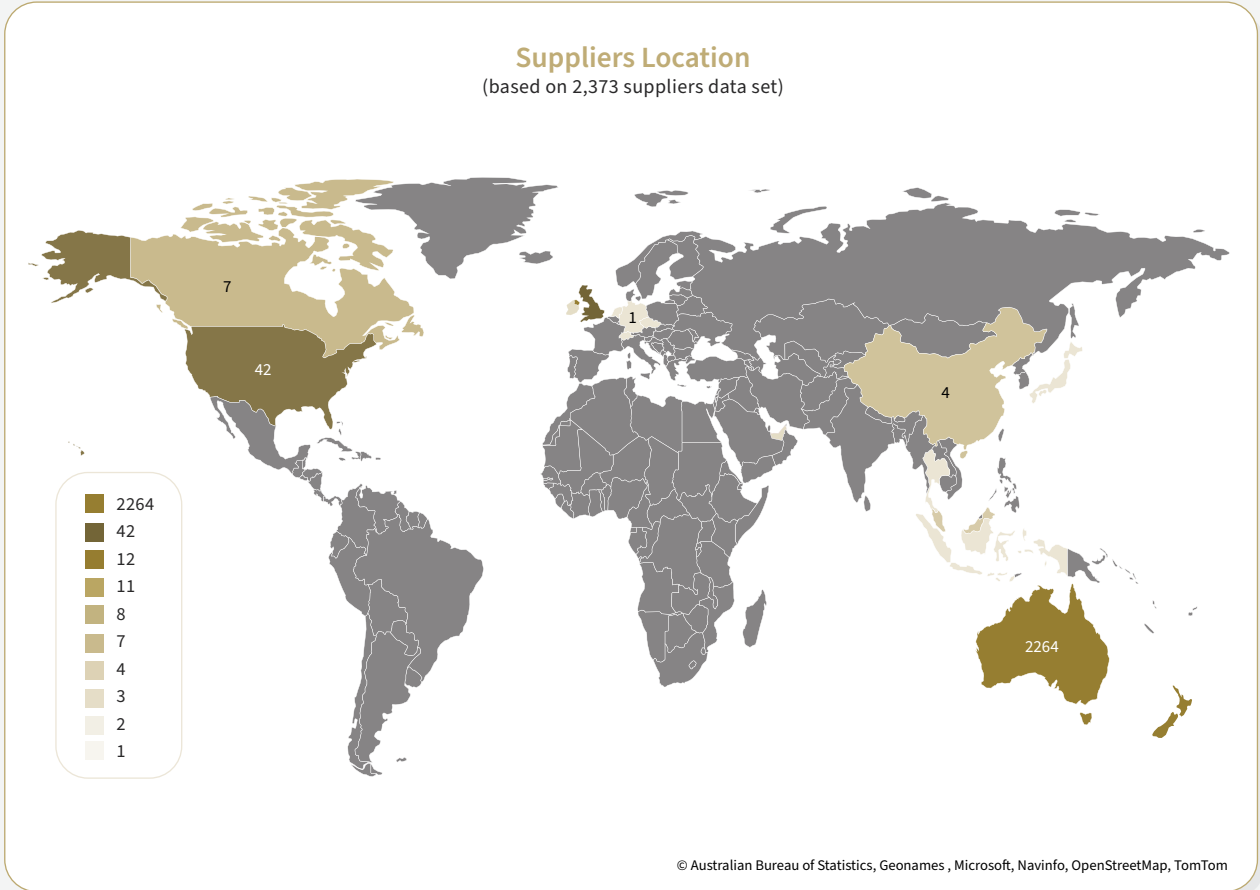
Crown is aiming to combine these four factors to map the potential modern slavery risk within its supply chain and identify the key categories within our supply chain in which modern slavery is more likely to occur. Currently, Crown is identifying supplier modern slavery risk through a manual process.

Based on spend, Crown is using a separate database to manage supplier profiles for Tier 1 Suppliers. Through this platform, 2,373 suppliers have been identified as active with a transaction in the last 18 months, and 95% of these active suppliers are based in Australia. The completion rate of the Modern Slavery questionnaire to date is 50.5%.

Factor 1: High risk geographies

Geographic Risk is a classification of countries or regions with a higher risk of Human Rights and Modern Slavery impacts. The high-risk geographies include countries and regions that are vulnerable

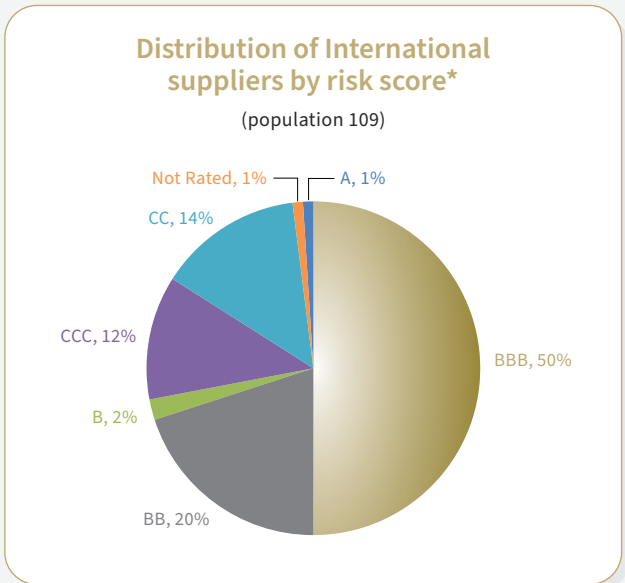
to bribery and corruption, or without strong labour laws and governance. The Classification used in this assessment is the one provided by the Global Slavery Index 2018 (from: www.globalslaveryindex.org). Our suppliers are located as follows:



The classification in use ranges from D, with a wholly inadequate response to modern slavery, through to AAA for countries that have an effective and comprehensive response to modern slavery.

As per the Chart, 27% of Crown’s international suppliers are operating in countries having a high risk of modern slavery due to poor response from their governments. This represents less than 2% of Crown’s overall supply chain.

28 suppliers are operating in a country rated as CC and CCC, the highest risk of our portfolio. However, only one of our identified suppliers operates in a high risk industry: “Operating Supply and Equipment”.



1. The Classification is based on the Global Slavery Index 2018 (from: www.globalslaveryindex.org). Details on the classification can be found in the Global Slavery Index 2018 report, Appendix 2, Table 6. The range decrease from AAA as to D.

Factor 2: Vulnerable population

The vulnerable population factors aim to identify groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. Directly correlated with the geographic risk, the level of worker vulnerability and risk of poor labour practices and exploitation are also recognised to be higher in contexts where base skilled labour is relied upon.

The high risk of this dimension is calculated based on an affirmative response to the question “Is your product or service provided to Crown subject to seasonal peaks and troughs, whether in demand or availability?”

Of the cohort of suppliers that have completed the Modern Slavery Assessment, this risk represents 7% (84 Suppliers).

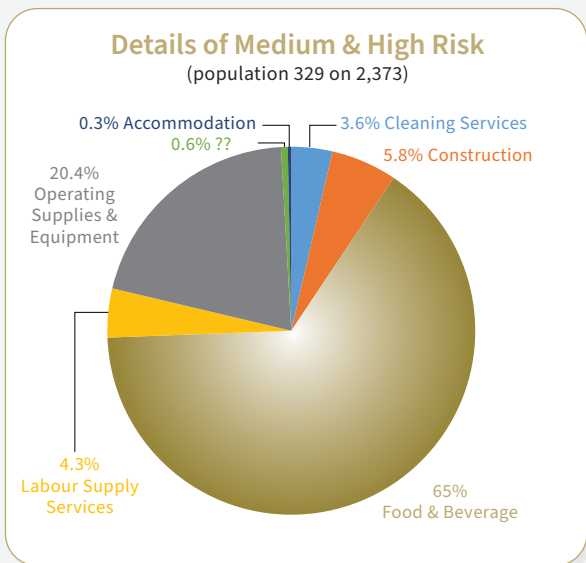
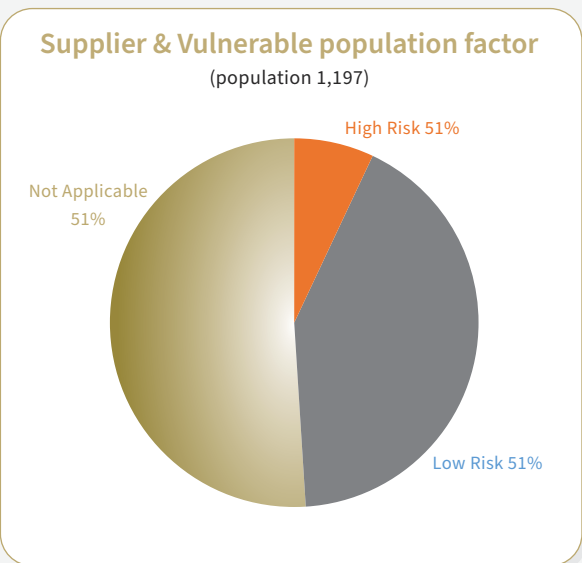
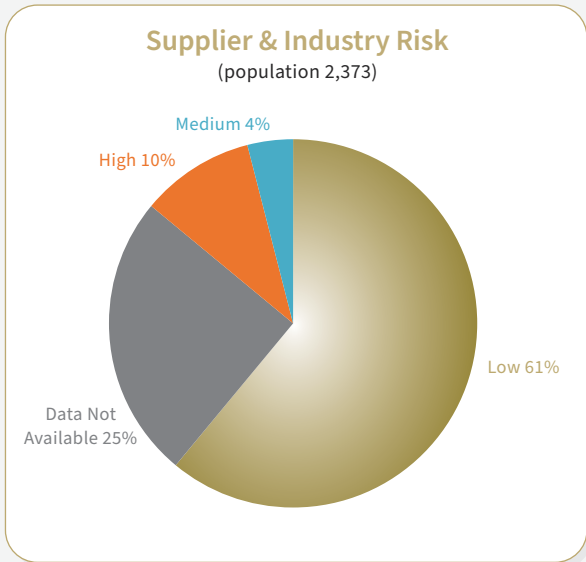
The suppliers with high-risk vulnerable population factors are within two categories: “Food & Beverage” and “Labour Supply”.

Factor 3: High risk category

Crown has deployed the ANZIC Classification tool to assess modern slavery risk in our supply chain, recognising that industries that rely heavily on low-skilled labour and/or involve dirty, dangerous and difficult work have a higher prevalence of inherent modern slavery risk.

The result shows that 61% of the cohort of suppliers that have completed the Modern Slavery Assessment are rated low risk, with 14% showing as medium to high risk.

The principal industry driving the medium to high risk are food and beverage suppliers.

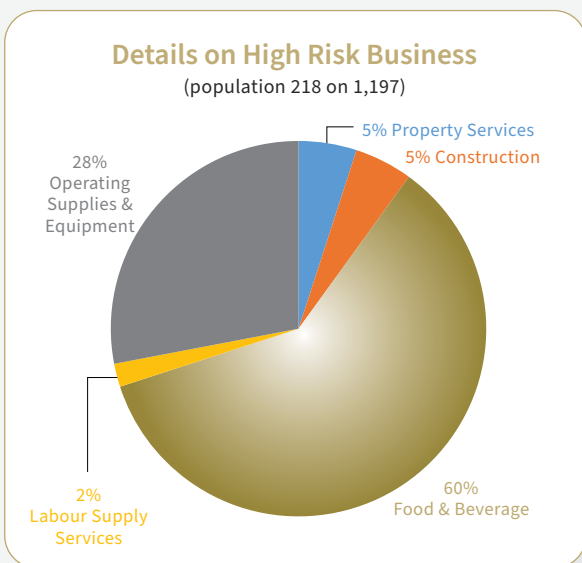
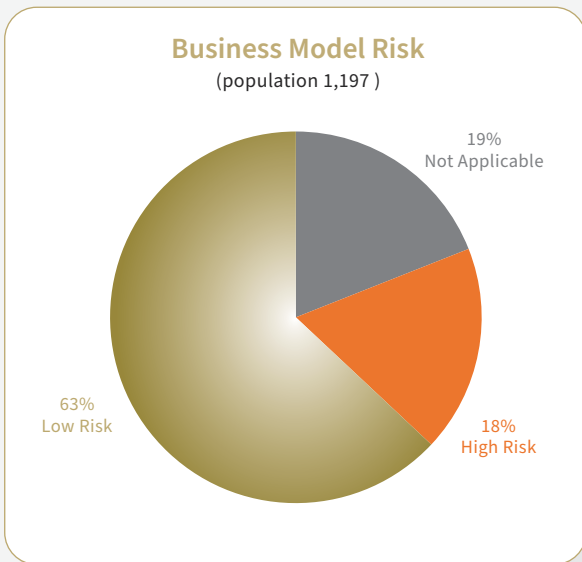


2. This question forms part of the Modern Slavery questionnaire collected within the Supplier profile system. The completion rate of this questionnaire is 50%
 3. The two questions form part of the Modern Slavery questionnaire collected within the Supplier profile system. The completion rate of this questionnaire is 50%

Factor 4: High risk business models

High risk business model analysis aims to identify suppliers with business models that rely on third parties for the provision of services (e.g. labour hire), that therefore increase the risk of modern slavery in Crown's supply chain.

The result from the analysis of the combination of two questions shows that 63% of the supplier's panel are rated low risk, while 18% are rated high risk.



Supply chain risks

Crown recognises that no global supply chain is free of modern slavery.

Crown has identified its risk factors and supply chain risks and performed an analysis over its suppliers. Following completion of this process, Crown identified the following key modern slavery risk categories within its global supply chain:

1. Food and beverage;
2. Operating supply and equipment specifically in relation to:
 - textiles, including uniforms and linen
 - construction materials;
3. Labour supply services specifically in relation to:
 - our cleaning services
 - construction.

Our Past and Future Actions

Following the enactment of the Act, Crown has developed a program of work to identify and to monitor modern slavery risks. It includes a long-term plan to deliver strengthened processes and continuous improvement to internal processes, to embed in all our supplying activity and related decision the consideration and the active monitoring of the modern slavery risk. Crown aims to reflect these actions in the annual Modern Slavery Statement.

Key achievements up to 2022

Governance

Since the implementation of the Act, Crown has implemented a set of frameworks that establish policies, processes and key responsibilities to address the modern slavery risk within our operations.

In FY2022, Crown commenced development of an enhanced Modern Slavery Remediation Framework. This framework is designed to ensure that Crown can effectively remediate any cases of modern slavery that might arise in its operations or supply chains. The framework is a series of principles and steps that can be implemented according to the context and circumstance of the situation being addressed. It is discussed further in the Governance and Strategies section of this Statement.

High-Risk Supplier Analysis Tool

In a prior period, Crown developed a High-Risk Supplier Analysis Tool enabling Crown to identify the potential risk of modern slavery in Crown's supply chain as well as tiering of Crown's suppliers against its level of potential exposure to modern slavery risk, using questionnaires and refined due diligence. The objective is to focus on the areas of highest risk.

During FY2022, Crown identified several limitations with this tool, which made it difficult to replicate the previous assessment and expand our scope of suppliers to low-value, high-risk which is the next logical tier of assessments. Therefore, an alternative solution has been used for FY2022.

These limitations, including the lack of an appropriate system, will be remediated by the implementation of a new system in the coming periods.

Internal procedure and embedded risk assessment

All Crown procurement tender documents, tender decision tool and contract precedents integrate modern slavery considerations and/or assessments. They are completed prior to any recommendation or decision being implemented by Crown.

During the reporting year, Crown strengthened the process of supplier onboarding by the inclusion of modern slavery considerations into Crown's decision tools. As such, modern slavery risk consideration is mandatory prior to any award of business.

Key supplier engagement

Since FY2019, Crown has undertaken a program of ongoing engagement with key suppliers with high modern slavery risk, based on the risk factor identification process. The program is centred on Crown facilitating focused sessions with key suppliers to firstly understand their modern slavery policies and plans, work with them to strengthen and enhance their policies, and jointly develop reporting to track progress.

During the reporting period, there was a reduction in the number of suppliers engaged due to the lack of an appropriate system.

Training and awareness

Crown has a Modern Slavery training module, which creates awareness of modern slavery risks for those Crown staff who have interaction with suppliers, and it also provides instructions for the identification and reporting of modern slavery risks. During the reporting period, the training has been maintained.

2023 Priorities

Crown is committed to strengthening our practices in order to identify and remedy modern slavery in its supply chain. To do so, Crown is seeking to improve our monitoring and reporting capability by using a new platform, embedded in our operations, that contains modern slavery capabilities. To continue progressing this, Crown will undertake additional key actions in the FY2023 reporting period.

Implement Crown's Remediation Framework

During the next reporting period, Crown will implement its Remediation Framework, including policies and procedures to be followed in the event that modern slavery is identified within our supply chain. Remediation plays a critical role in creating awareness and driving improvement in reducing modern slavery harm.

Audit process improvements

Crown is committed to improving its audit processes, focused not only at first line (through the supplier onboarding process), but also second line (proactive and periodic reviews) of our medium to high-risk vendors, and having this form part of a broader supplier due diligence framework and risk assessment process long term transformation.

Crown does not currently audit suppliers in relation to modern slavery risks but has committed to additional assurance measures as we mature in our supply chain due diligence approach. As such, the priority for FY2023 will be to design this audit approach.

Modern Slavery training

Crown will undertake a review of the Modern Slavery training module to extend to all relevant staff.



Modern Slavery: Governance & Strategies

Governance Structure

Crown is committed to strengthening our practices in order to identify and remedy modern slavery in its supply chain. To do so, Crown is seeking to improve our monitoring and reporting capability by using a new platform, embedded in our operations, that contains modern slavery capabilities. To continue progressing this, Crown will undertake additional key actions in the FY2023 reporting period.

Governing Policies

The commitment of Crown to addressing modern slavery within our operations is supported by a framework of policies that are reviewed and updated every year. The four policies with a direct link to the program are: the Code of Conduct, the Human Rights Policy, the Supplier Code of Conduct and the Whistleblower Policy.

Human Rights Policy

To understand its salient human rights issues and with the support of independent human rights subject matter experts, Crown identified four human rights issues where Crown believes it can mitigate risks, prevent harm or support better outcomes for its stakeholders.

The areas identified are: labour rights, health and safety, equality and discrimination and Indigenous rights.

Adopted by the Crown Board, the Human Rights Policy articulates Crown's commitment to understanding and acting on the impact on people of our business activities and supply chain. In respect of modern slavery, Crown has committed to identifying and addressing the risk of modern slavery practices in our direct supply chain.

Code of Conduct

Crown's Code of Conduct sets the standard required of everyone who works for Crown and its Australian resorts, including directors and employees.

The Code of Conduct incorporates a standard of conduct on human rights that recognises the importance of human rights of all stakeholders and ensures that Crown's operations do not contribute to modern slavery practices.

Individuals covered by the Code of Conduct are expected to create and maintain a work environment that respects human rights and is free from unlawful discrimination and harassment.

Supplier Code of Conduct

In 2018 Crown implemented a Supplier Code of Conduct which is reviewed every year. The Supplier Code of Conduct highlights Crown's key values and operating principles, including human rights and workplace conditions, and outlines the expectations Crown has of its supplier.

The Code requires Crown's suppliers to align with Crown's values and provides Crown with the right to periodically assess supplier practices against the Supplier Code of Conduct.

Whistleblower Policy

Crown's Whistleblower Policy is designed to promote and support a culture of integrity and ethical behaviour and to encourage the reporting of misconduct and wrongdoing. The Board recognises the important role whistleblowing can play in the early detection of misconduct. Crown's Whistleblower Policy sets out:

1. the disclosures which qualify for protection;
2. how disclosures can be made and to whom;
3. the process for investigating disclosures; and
4. the importance of maintaining confidentiality and protection against victimisation.

The procedure for investigation and how disclosures may be made considering protection of identity and confidentiality are outlined in the policy. Whistleblowers are encouraged to contact STOPLine to make a disclosure under this policy. STOPLine is an independent and confidential service which is available 24 hours a day, seven days a week.

STOPLine is accessible to all our suppliers.

Our strategy

The behaviours and practices which constitute Modern Slavery are serious human rights violations. Modern Slavery practices include trafficking in persons, slavery, slavery-like practices (including forced labour and forced marriage) and the worst forms of child labour.

Modern slavery risk refers to the potential adverse impact that a company can have on an individual or community's labour-related rights.

Crown's strategy to identify and participate in the remediation of modern slavery in our supply chain is based on the following five pillars:

1. Crown's purpose and values
2. Strong partnerships with our third parties
3. A Modern Slavery Identification process
4. Remediation Plan
5. Training and Awareness





Third party partnerships

It is widely acknowledged that modern slavery cannot be tackled in isolation but should be in partnership with suppliers. Based on this view, Crown has put its Modern Slavery program into action by commencing the building of strong partnerships with our third parties. While it is acknowledged that Crown is still at the beginning of this journey, Crown's vision encompasses our end-to-end relationships with our suppliers, along with Crown as a provider of services.

Onboarding: qualification process

Modern slavery risk is assessed from the supplier qualification and onboarding process in the following ways:

- All Crown procurement tender documents and tender decision tools integrate modern slavery considerations and/or assessments. They are completed prior to any recommendation or decision being implemented by Crown. The inclusion of modern slavery considerations into Crown's decision tools have made modern slavery a mandatory consideration prior to any award of business.
- The onboarding process also includes an assessment of sanctions and enforcements, watchlists, adverse media, politically exposed persons and modern slavery. Active suppliers are continually monitored against these risk factors.
- Crown has an onboarding questionnaire for its Australian operations, which captures a large part of Crown's suppliers, and provides Crown with transparency and insight about the sustainability of its suppliers, including health and safety, human rights and environmental impacts. Prospective and new suppliers are required to complete a detailed questionnaire as part of Crown's supplier pre-qualification and risk assessment processes that include the modern slavery questions.

Supplier contracts and purchase order terms and conditions

Crown's supplier contracts and purchase order terms and conditions contain Human Rights Policy clauses requiring compliance with the Act and notification of any identified instances of modern slavery in its operations and supply chain.

Supplier relationship management

Supplier relationship management meetings take place on either a quarterly or biannual basis, with the significant goods and service providers, including suppliers within the high-risk categories of providers. Those suppliers are required to complete a scorecard which includes criteria on compliance with labour laws and subcontracting arrangements.

Supplier forums

Crown typically holds supplier forums twice yearly for our key operational suppliers (high business impact or value). Following the introduction of the Act, a number of these forums were used by Crown to raise awareness of modern slavery amongst these key suppliers.

As a consequence of the COVID-19 restrictions and staffing constraints in the hospitality industry and supply chain in general, Crown was unable to hold these during the period, and will reinstate supplier forums in the coming reporting periods.

Partnership with our customers

As a supplier of services, Crown works willingly with all its clients to provide all information required from it as part of the client Modern Slavery program.

Identifying our supply chain risk

Supplier segmentation

All analytics are based on the segmentation of our suppliers using four risks factors:

1. Country
2. Category/sector
3. Risk business models
4. Vulnerable populations

The table below provides more details:

The four risk factors as the base of modern slavery risk identification and segmentation

1. Vulnerable populations - groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. The level of worker vulnerability and risk of poor labour practices and exploitation are recognised to be higher in contexts where base skill labour is relied upon.

2. High risk categories - products and services regarded as having more significant inherent modern slavery risk – including industries that rely heavily on low-skilled labour and/or involve dirty, dangerous and difficult work.

3. High risk geographies - countries which are known to have higher human rights (and modern slavery) risks. High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance.

4. High risk business models - business models that rely on third parties for the provision of services - often labour hire. Outsourcing reduces company visibility over third-party recruitment practices and provision of worker entitlements.

Crown acknowledges that where multiple risk factors co-exist there is a higher likelihood that actual harm is being experienced.

Crown is committed to assessing and addressing modern slavery practices in our operations and supply chain.

Second phase assessment

Following the initial assessment process which specifically identifies suppliers' risk of potential exposure to modern slavery using the segmentation analysis, we are aiming to re-evaluate high risk suppliers to refine the risk rating in accordance with the following criteria:

1. Does the supplier provide a Modern Slavery Statement? This gives an indication if this risk is considered by our supplier as part of their operations.
2. Is the supplier a Member of a Self-Monitoring Organisation?
3. Does the Supplier have Enterprise Bargaining Agreement status? This shows the existence of Union and the high consideration of employee rights.
4. Is the supplier contracted under Crown's Terms and Conditions?
5. Has the supplier completed the Supplier Profile and answered the Anti-Money Laundering and Modern Slavery Questionnaire?
6. Is the supplier part of Crown's Supplier Relationship Management Program?
7. Does the Risk Software screening and continued monitoring of suppliers report any issue or flag with regards to Modern Slavery and Human Rights?
8. Has Crown obtained acknowledgement and understanding from Crown's identified high risk suppliers of Crown's Supplier Code of Conduct and the Human Right and Modern Slavery additions?

Crown will continue to review and refine its modern slavery risk identification processes and identify areas of high risk to determine if Crown's operations or supply chain are linked to any instances of actual modern slavery harm and Crown's ability to remediate any such harm.

Remediation plan

The remediation framework

Remediation in the context of modern slavery is the process of correcting the harm experienced by victims of modern slavery as well as the prevention of further harm.

The concept of remedy aims to restore individuals or groups that have been harmed – in this case by a business’s activities – to the situation they would have been in had the impact not occurred.

As set out in the United Nations Guiding Principles (UNGP), which underpin the Act, remedy includes:

“Apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well the prevention of harm through, for example, injunctions or guarantees of non-repetition.”

The key elements of a remediation process are presented in *Figure 2* below.

The grievance mechanism

Grievance mechanisms are the cornerstone of the modern slavery remediation framework. It is defined as formalised ways used to identify, assess, and resolve adverse impacts Crown may have caused or contributed to as part of our activities.

To meet the expectations set out by the UNGPs, grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, promote continuous learning, and be based on engagement and dialogue. The final criterion relates to operational-level grievance mechanisms only.

Effective grievance mechanisms should be designed and implemented with an understanding of the current modern slavery risk landscape in the business’s operating environment. It is also influenced by the existing internal ecosystem for remediation within a business.

Crown’s internal ecosystem for remediation contains the following:

- **Risk And Compliance Governance Framework**

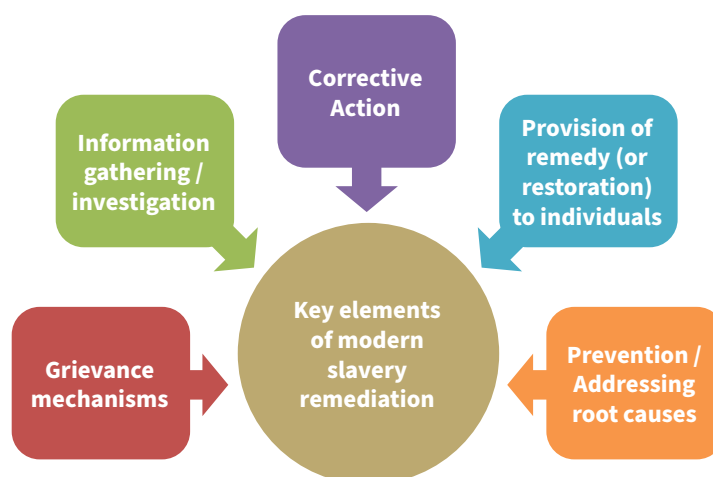
This includes the Risk Appetite Statement and Human Right Policy.

The Compliance Governance and Risk Functions owns the Whistleblowing Hotline, which is operated by an external provider to ensure anonymous discussion. Compliance and Risk Officers are the conduit for internal investigation and coordination of the case remediation.

- **Procurement and Supply Chain Framework**

This includes policies, Supplier Code of Conduct and Know your Suppliers mechanisms (Suppliers profiles, Modern Slavery questionnaires, site audit, Media/ Sanction screening).

Figure 2: Key elements of remediation process



The process of responding to issues of modern slavery

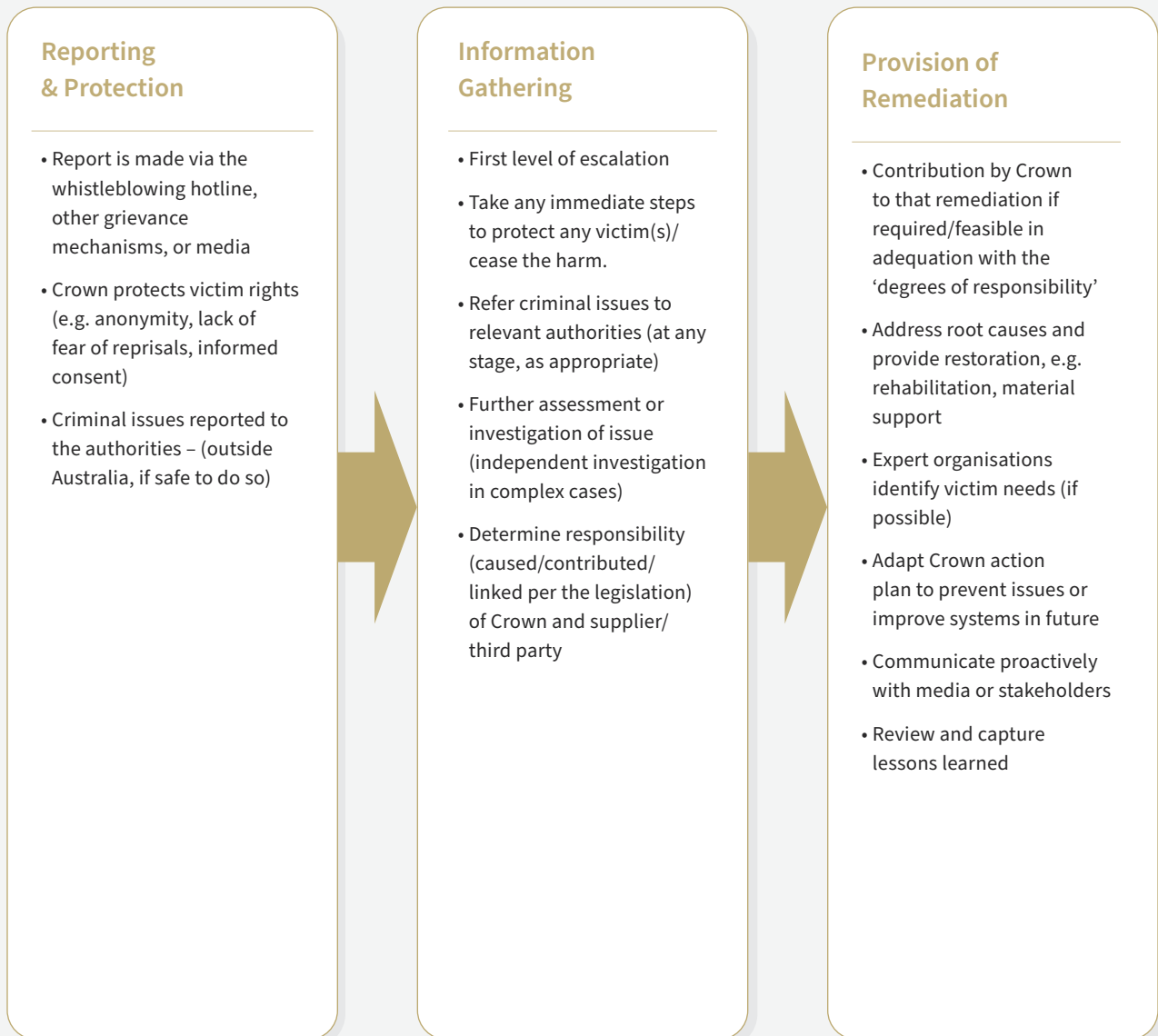
Crown's response to issues of modern slavery in our operations and supply chain are articulated around seven concepts. These concepts are - victim centred, context specific, transparent, accessible, responsible, collaborative and action-focused.

The response has three stages:

- Reporting and protection
- Information gathering
- Provision of remediation

The following chart sets out the potential sequential flow on those three steps in more detail:

Figure 3: Sequential flow of remediation



Provision of remediation

Provision of remediation is based on where the responsibility lies for the modern slavery breach. The duty and ability to provide remedy shifts is driven by the extent to which Crown or its suppliers have caused the harm in question.

The degree of responsibility can be categorised into three levels:

- **Caused** by Crown: take action to cease or prevent the risk and provide for or cooperate in remedying any actual impact.
- **It is expected that Crown would lead the remediation plan.**
- **Contributed** to harm caused by a third party: Take action to cease or prevent our contribution to the risk and provide for or cooperate in remedying any actual impact. Use leverage to mitigate remaining risk as much as possible.
- **It is expected that Crown may lead the remediation plan or actively participate.**
- **Directly linked:** the harm is caused by a third party with no to minimal influence from Crown on third party practices. Crown may have some responsibility for remediation and bring some contribution if feasible/required. It can be considered to end the business relationship if Crown lacks the leverage to influence the entity causing the risk to change its behaviour.
- **It is not expected that Crown lead the remediation plan or actively participate.**

Training and awareness

Procurement & Supply Chain Employees Training and Awareness

During the reporting period all Procurement, key Supply Chain and Projects staff have completed the training.

Figure 4: Degree of responsibility



Assessing the Effectiveness of Actions

Crown acknowledges that this reporting period was significantly impacted by COVID-19 shutdowns and closures. As a consequence, Crown is developing further plans to provide active management of potential modern slavery risks.

Following the commencement of the Act, Crown engaged an external specialist human rights and impact adviser to undertake a modern slavery readiness assessment to determine the maturity of Crown's approach to managing operational and supply chain modern slavery risks, informed by and aligned with the UN Guiding Principles on Business and Human Rights and other relevant international frameworks. A roadmap was then developed to enhance Crown's maturity and during the reporting period Crown continued to implement the recommended actions of the Roadmap.

Crown's Risk Management Committee monitors disclosures made under Crown's Whistleblower Policy. No instances of modern slavery were identified through this process during the reporting period. Crown recognises that this does not mean that no instances of modern slavery existed in our operations or supply chain, and will consider ways to strengthen the effectiveness of reporting instances, or suspected instances, of modern slavery.

Crown expects that as we mature in our approach and understanding of modern slavery, our processes will continue to evolve and our ability to assess the effectiveness of our actions will be enhanced.





Crown Resorts Limited ACN 125 709 953