



# MODERN SLAVERY STATEMENT 2024



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# 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.



# CHAIRMAN'S MESSAGE

Crown is committed to respecting and upholding human rights and ensuring modern slavery risks are proactively identified and managed across our operations and supply chains.

Our approach to human rights aligns to becoming the safest place to gamble in Australia. We have made significant changes to our operations in recent years to prevent bribery and corruption happening within our business and communities, as well as giving our own team a voice to Speak Up about these matters through our refreshed Whistleblower Program.

We recognise the need for meaningful action to address this global issue, and the important role we play as one of Australia's largest hospitality and tourism employers. Crown has made notable progress in FY24, including:

- continuous enhancement of the supplier due diligence and lifecycle frameworks and processes to mitigate modern slavery risks of our suppliers.
- implementing our new Procurement Policy and Supplier Code of Conduct and conducting training across the business to align with the policy and best practice to reduce our modern slavery risk.

- enhancing our modern slavery training module to include updated information about high-risk sectors, key facts, new initiatives, and global regulations.
- enhanced modern slavery data analytics processes underpinned by our risk management framework

I am pleased to sign and present this Statement, which was approved by the Crown Resorts Limited Board on 5 December 2024.

**John Borghetti**  
Chairman,  
Crown Resorts Limited





# 1. ABOUT THIS STATEMENT

Crown Resorts Limited (Crown) has prepared this Statement in accordance with the Modern Slavery Act 2018 (Cth). The Statement describes the steps taken by Crown and its controlled entities to assess and address risks associated with modern slavery in its operations and supply chain during the reporting period.

This joint statement covers Crown Resorts Limited (Crown), and all Crown Group reporting entities listed (together referred to as the Group or Crown) in Appendix A. The information in this statement offers a holistic description for Crown, except where stipulated information pertains to a specific entity. The entities included in the 2024 Modern Slavery Statement cover Crown's activities throughout the financial year ending 30 June 2024.

This statement was approved by the Crown Resorts Limited Board of Directors in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

# 2. INTRODUCTION

Crown is one of Australia's largest entertainment groups with its core businesses and investments in the integrated resorts sector. We operate three of Australia's leading integrated resorts – Crown Melbourne, Crown Perth, and Crown Sydney, and are one of the largest hospitality and tourism employers in the country. Our integrated resorts in Melbourne and Perth are the largest single-site private sector employers in Victoria and Western Australia.

Our organisation makes a major contribution to the Australian economy through its role in tourism, employment, and training. During the reporting period, approximately 98% of our revenue was generated from our Australian operations.

As a global issue requiring immediate attention, from which no country is immune, we respect all human rights, and we acknowledge and commit to identify and address modern slavery in our operations and supply chain. We believe 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 (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.

Respecting human rights is aligned with our efforts on preventing bribery and corruption, anti-money laundering and counter-terrorism financing and operating sustainability. In addition, our Whistleblower Policy outlines the many ways our team and our suppliers can raise concerns in respect to these issues.

## How we achieved our commitments in 2024

Crown continues to develop a program of work to identify and to monitor modern slavery risks. Crown has adopted a continuous improvement model to the monitoring of our operations and supply chain activity including the active monitoring of our modern slavery risks.

In our FY23 statement we highlighted areas that we were going to focus on during FY24.

### What we said we would do

In FY24 we committed to reviewing our assurance practices to ensure we appropriately assess the effectiveness of our actions in addressing modern slavery risks in our operations. We will work closely with our risk and assurance teams and other business partners, including our subsidiary reporting entities, to review our current processes and identify areas to improve how we assess the effectiveness of our actions to manage our modern slavery risks.

We are also committed to refreshing our Human Rights Policy to better reflect our values and to include a greater emphasis on the steps we are taking to reduce our risk of modern slavery in our operations and/or supply chains. The refresh of this policy was to provide a deeper understanding of the salient human rights issues that may impact us, our guests, team members or any other person directly or indirectly affected by our actions. We believe we can mitigate risks, prevent harm and support better outcomes for our stakeholders.

We are committed to using the newly implemented supplier engagement framework to further understand and mitigate the modern slavery risk of our higher risk suppliers as identified in FY2023.

We will continue to focus on increasing the modern slavery data quality of our suppliers, including those supplying our subsidiary reporting entities, with the objective of improvement in the assessment methodology to highlight potential modern slavery risk.

### What we achieved in FY24

We commissioned an internal audit of our modern slavery statement and identified improvement opportunities from the audit. Those opportunities have resulted in changes to our assessment of modern slavery within our operations which are reflected in our modern slavery statement.

We introduced a second line oversight and assurance assessment of our modern slavery statement.

Our Human Rights Policy is reviewed in line with the requirements our Policy Management Framework. In addition, we implemented our new Procurement Policy and Supplier Code of Conduct and conducting training across the business to align with the policy and best practice to reduce our modern slavery risk.

We continued to use our enhanced supplier engagement framework to assess supplier risks and have worked with our reporting subsidiaries to ensure consistency in our modern slavery risk assessment process.

## Looking forward to FY25

We are committed to our journey of continuous improvement to assess and manage modern slavery risks within our operations and supply chain. In FY25 governance and process improvements will include:

- a. Enhancing the overall Supplier due diligence and risk management process with the new governance framework and supporting documentation.
- b. Continued focus on enhancing the Modern slavery data quality and methodology to highlight potential modern slavery risk within our operations and supply chain.
- c. Continued oversight and assurance activities across our modern slavery risk assessment process and modern slavery statement development.



# 3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## Our structure and operations

The Crown Group is made up of four broad operational areas:



## Domestic operations

Our primary domestic operations are:



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



**Perth**  
Crown is Perth's ultimate entertainment destination, featuring three hotels, world class convention and gaming facilities, restaurants and bars, a 2,300-seat theatre, and shopping and entertainment facilities.



**Sydney**  
Crown Sydney is located at Barangaroo on the foreshore of Sydney Harbour and features 349 hotel rooms and suites and villas, world-class gaming, signature restaurants, bars, luxury retail, etc, pool and spa facilities and conference rooms.

## Online operations

Our wagering and online social gaming operations are comprised of Betfair Australasia, a 100% owned online betting exchange.

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 London, one of the high-end licensed casinos in the West End entertainment district. At the end of the reporting period, Crown London had approximately 188 employees located in London.

Crown London publishes a stand-alone Modern Slavery Statement under the Modern Slavery Act 2015 (UK).

## Other interests

Our other interests include the following:

1. 50% equity interest in Aspers Group, a UK-based regional casino operator,



## Our Workforce

### Crown Group Employees FY2024

Crown Resorts	12,414 (including 2176 casual employees)
Crown London (UK)	188
Betfair	120

## Our Revenue

### Crown Group Revenue by Jurisdiction FY2024

Australia	AUD 2,725.1 million (98% of total revenue)
UK	AUD 40.1 million (1% of total revenue)
Other	AUD 14.0 million (1% of total revenue)
Total	AUD 2,779.2 million

## Our Supply Chain

During the reporting period, Crown procured approximately \$1.2 billion of goods and services from approximately 6,500 suppliers.

### Our supplier categories based on spend:

Property and Facilities	14%
IT and Gaming	14%
Food and Beverage (including general supply)	13%
Corporate Services	10%
Marketing	4%
Government	31%
Other	3%

Approximately 94% of total spend from our Australian-owned and controlled operations during the reporting period was with direct Tier 1 suppliers (suppliers we directly procure from) located in Australia and pertained to Crown operations located within Australia.

We acknowledge that our direct suppliers may have operations in, or may source goods or services from jurisdictions which may have a higher risk for modern slavery.



# 4. IDENTIFYING MODERN SLAVERY RISKS IN OUR OPERATIONS & SUPPLY CHAIN

Whilst we understand that modern slavery risks are global, and we are committed to understanding and reducing those risks. We also understand that the modern slavery risks we face are subject to social and political issues outside of our or our government's control and therefore our modern slavery risk profile is continually changing.

The behaviours and practices which constitute modern slavery are serious forms of 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. Our approach to managing our risks is shaped by the UN Guiding Principles on Business and Human Rights (UNGPs).

We set out in Section 5 of this statement how we have assessed the modern slavery risks that we face.

## Understanding our operations and supply chain risks

Whilst we operate mostly within the confines of Australia, we understand that the level of modern slavery risk we face is derived from multiple interconnected factors such as:

1. geographical
2. product category and industry
3. business models
4. vulnerable populations

### Our Modern Slavery Risk factors

01

#### High risk geographies

High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance

02

#### High risk categories /sectors

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.

03

#### High risk business models

Business models that rely on third parties for the provision of services - eg. labour hire.

04

#### Vulnerable populations

Groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations

## Conceivable risks in our operations and communities

We understand that we operate within industries that may be considered to carry a higher risk of modern slavery, such as forced labour and forms of debt bondage within vulnerable communities.

Whilst we recognise these risks, we consider that there is a lower modern slavery risk relating to our operations, particularly our workforce. This is largely due to our recruitment and supplier onboarding processes, our policies and our training practices. Additionally, all team members and suppliers have access to our Whistleblower Policy and platform, as well as an increased focus on group-wide risk management.

### Direct Employees

Given the majority of Direct Employees of Crown are based in Australia, we consider that there is a lower modern slavery risk relating to Direct Employees working within these higher risk industries. This is largely due to Australian employment standards, which are internally supported by our recruitment and onboarding processes, policies and procedures and our training practices.

### Indirect Employees – Contractors hired through labour hire companies

We understand that contracted workers, including those from labour hire companies we engage, may be more vulnerable due to the nature of the lower skills required to perform the roles and a significant proportion of migrant and temporary personnel fulfilling those roles. To address this risk, our labour hire companies are subject to our supplier risk assessment methodology which supports our ability to undertake a risk assessment of those entities during the onboarding process.

Additionally, all Direct and Indirect Employees have access to our internal grievance processes and Whistleblower Policy and platform to escalate any concerns.

## Conceivable risks in our supply chains

We procure from many different industry groups, some of which may pose a higher modern slavery risk; from luxury textiles such as bedding and bathrobes, through to selection of fine wines. We recognise that modern slavery risks in our Tier 2 supply chains creates a challenge to identify and address the risks, however we employ a number of due diligence processes of our supply base to mitigate these risks. Within our 'direct' supplier relationships we have developed and implemented a standardised approach to assessing those risks.

See Section 5 for a detailed description of how we assess our risks.

Additionally, all suppliers and other eligible whistleblowers have access to our Whistleblower Policy and platform to escalate any concerns.

During this reporting period we have not identified any instances of modern slavery in our operations or supply chain, and we did not receive any reports through our reporting platforms. Crown recognises that this does not mean that no instances of modern slavery existed in our operations or supply chain and will strive to consider ways to strengthen the effectiveness of our modern slavery risk assessment approach and reporting to identify and address instances, or suspected instances, of modern slavery.





# 5. ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

Integrated resorts are a layered and complex business spanning many industries within their own premises, including entertainment, gaming and hospitality. We understand our modern slavery risk profile will change and evolve as we evolve and vary across those industries. Further, in line with the UNGPs, we understand the potential for our business to cause, contribute to, or be directly linked to modern slavery.

We have a proactive approach to identifying and assessing risks in our operations and supply chains, as well as a robust remediation process should harm be identified. Our response and actions to assess and address modern slavery risks in our operations and supply chain are based on four key foundations:

- Governing policies.
- Awareness training.
- Risk assessment and supplier due diligence.
- Remediation and reporting



## Governing Policies

To support our framework in addressing our modern slavery risks within our operations and supply chains we have several Board approved policies.

### Human Rights Policy

We have identified the following human rights issues where we believe we can mitigate risks, prevent harm or support better outcomes for our team members, guests, suppliers and other communities. The areas identified are modern slavery, labour rights, health and safety, equality and discrimination and Indigenous rights. Adopted by the Board, the Human Rights Policy articulates our commitment to understanding and acting on the impact on people of our business activities and supply chain. In respect of modern slavery, we have committed to identifying and addressing the risk of modern slavery practices in our operations, our supply chain and other business relationships.

### Code of Conduct

Our Code of Conduct underpins our commitment to ethical behaviour, responsible business practice and good governance. Underpinned by our values, our Code of Conduct ensures we meet the expectations of our stakeholders, including our guests, team members, governments, regulators and communities in which we operate.

Our Code of Conduct guides our daily decisions, encourages team members to perform at their best, and inspires our teams to live our values while acting responsibly.

### Whistleblower Policy

Our 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 and procedures.

Whistleblowers are encouraged to use our Whistleblower platform, managed by Core Integrity, to make a disclosure under this policy. Core Integrity is an independent and confidential service which is available 24 hours a day, seven days a week.

Core Integrity is also accessible to all Crown suppliers, their employees and family members.

### Procurement and Supply Chain Policy

The Procurement and Supply Chain Policy ensures that the procurement of all goods and services is conducted in an honest, competitive, fair and transparent manner that delivers the best value for money outcome, whilst at the same time protecting our reputation, taking into account the required specification, quality, service, delivery and reliability of the supplier and the goods and/or services, as well as other factors, including environmental, social and governance considerations.

This policy sets the engagement rules of Procurement & Supply Chain for the business, the principles underlying the purchasing activities, Supplier Relationship Management, and the directives specific to the importation of goods.

### Supplier Code of Conduct

We aim to model good business practices, promoting a collaborative relationship where we and our suppliers work together to build a fair, professional and respectful business relationship. Our Supplier Code of Conduct sets out the minimum standards of behaviour that we expect our suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.



## Training and awareness

To identify and address our modern slavery risks we need our team members to be the first line of defence and understand the red flags that may indicate modern slavery activity.

We have selected an online training module designed to demystify modern slavery and will build awareness within our teams. The key learning outcomes include helping our team members understand what modern slavery is, identify risks in our operations and supply chains, and how to raise concerns.

As stated in the section 'How we achieved our commitments', we undertook a review of our former modern slavery training module. In FY24 we delivered the training to a wider audience across the group providing greater awareness of our modern slavery risks. This audience includes staff that have interactions with suppliers, including those authorised to enter into contract negotiations on behalf of Crown and the Procurement Team.

In addition to modern slavery training all our team members were required to complete the following training modules via our dedicated learning platforms:

- Risk and Compliance
- Speak Up and Whistleblower
- Code of Conduct
- Anti-Bribery and Corruption

By the end of 2024, our goal is to have 100% of the training audience complete the modern slavery training.

## Risk assessment and supplier due diligence

Crown acknowledges that modern slavery cannot be tackled in isolation and should be done in conjunction with our suppliers. As such, working with our suppliers, Crown strives to improve our approach to supplier risk assessments.

Crown's Approach to assessing Modern Slavery Risk

### Stage 1 - Initial Modern Slavery Assessment

Crown's initial onboarding phase allows us to assess modern slavery risk in the following ways:

- All procurement tender documents and tender decision tools have integrated modern slavery considerations and/or assessments. Through this integration we have made modern slavery a consideration prior to commencing business with a supplier.
- The onboarding process also includes an assessment of sanctions and enforcements, watchlists, adverse media, politically exposed persons and basic human rights. This assessment is completed at onboarding and on an ongoing basis for any current suppliers.
- We also utilise a supplier onboarding questionnaire for our Australian operations. This questionnaire is completed by a large cohort of suppliers based on the value of products and services being acquired by Crown. This provides transparency and insight about the sustainability of our suppliers, including health and safety, human rights and environmental impacts. Prospective suppliers are requested to complete a detailed questionnaire as part of our prequalification and risk assessment processes.

### Supplier contracts and purchase order terms and conditions

Our supplier contracts and purchase order terms and conditions include clauses pursuant to complying with our Human Rights Policy and the Modern Slavery Act 2018 (Cth). In addition, the terms and conditions specify that a supplier must notify us of any identified instances of modern slavery in its operations and supply chain.

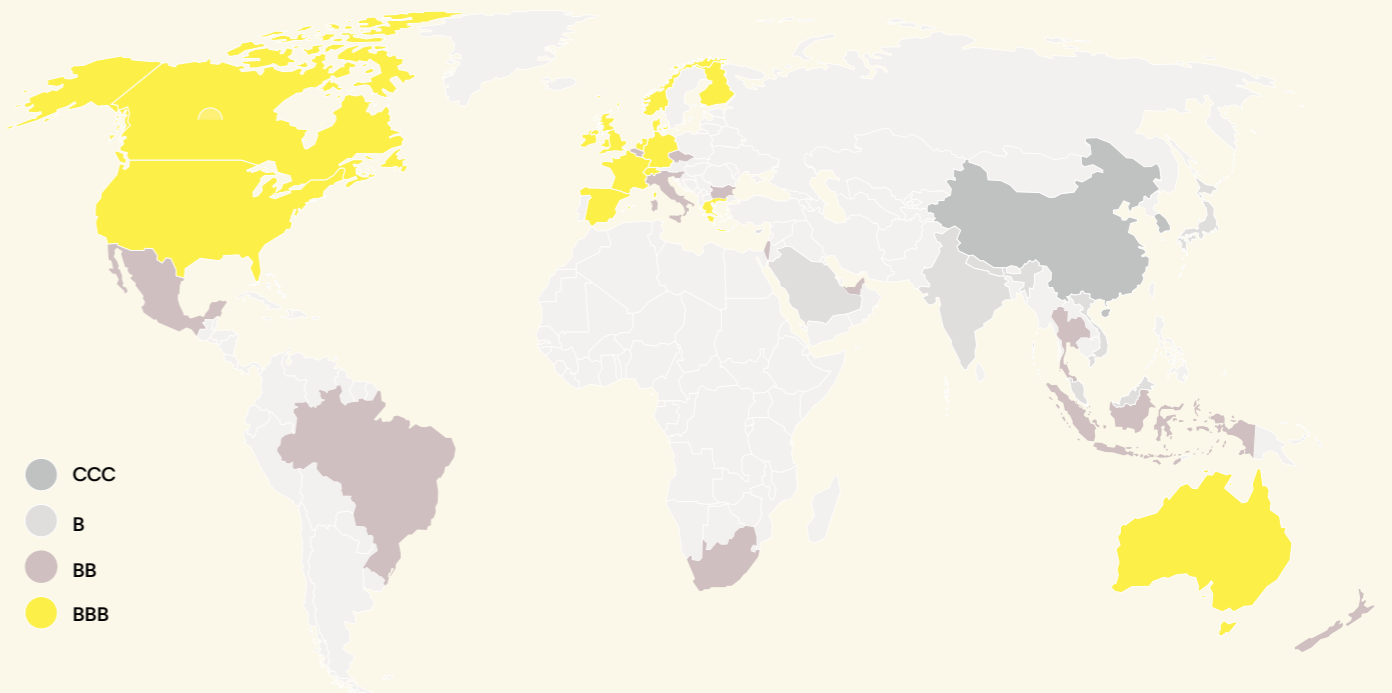
### Stage 2: Enhanced Modern Slavery assessment

The enhanced modern slavery assessment consists of assessing suppliers against the 4 Modern Slavery Risk Factors.

1. High risk Geographies
2. High risk Industries
3. Vulnerable populations
4. Business models

### Factor 1: High risk Geographies

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 2023 (from: [www.globalslaveryindex.org](http://www.globalslaveryindex.org)). Our suppliers are located as follows:



Crown has assessed the geography of approximately 98% of its suppliers. Based on that analysis, Crown procures approximately 94% of its goods and services from Australia, and approximately 6% are from international suppliers. Based on the criteria of the global slavery index 97% of our suppliers are BBB countries, which have an effective and comprehensive government response to modern slavery, around 1% on BB and B, and around 2% on CCC.

high-risk vulnerable population within their supply chain across the following industry categories:

Food & Beverage" (23%), "Corporate Services (including labour hire)" (9%), "Marketing" (5%) "IT & Gaming" (8%), and "Property and Facilities" (9%).

### Factor 2: Vulnerable population

The vulnerable population factor aims 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 lower skilled labour is relied upon.

### Factor 3: Industry risk category

We use an ANZSIC Classification tool to determine the industry category of our suppliers, recognising that industries that rely heavily on low-skilled labour and/or involve arduous, high-risk, and demanding work have a higher prevalence of inherent modern slavery risk. Crown was able to assess 90% of our suppliers.

Of the suppliers assessed, 8% of suppliers were considered high risk industries with the main two categories being "Food and Beverage" and "Corporate Services".

The criteria is extracted from our Supplier Questionnaire which approximately 39% of Crown's suppliers have completed the questionnaire. Based on the supplier responses to that questionnaire, we identified 479 suppliers that have a potential

#### 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 may have a higher risk of modern slavery in their supply chain.

The analysis of responses to our Supplier Questionnaire identified that 6.71% of suppliers in our supply chain may have a higher risk of modern slavery in their operations or supply chains due to their business model. Of those 6.71% of suppliers the main categories of business models were in the following industries: Food & Beverage (26%), Corporate services (including labour hire) (5%), Marketing (5%), IT & Gaming (4%), and Property & Facilities (11%).

#### Identification process: risk mapping

During our risk mapping processes, we identified 479 suppliers with at least one of the four factors with a high-risk rating. After further factor analysis and measuring the resilience strength of the supplier against modern slavery risks, we established that 7 suppliers' governance processes to address the potential modern slavery risks could be improved. Those 7 suppliers are evenly dispersed within our supplier categories. In FY25 these 7 suppliers will be subjected to a deep dive into their modern slavery governance processes.

#### Remediation & Reporting

Crown has a dedicated remediation framework and documented process to follow should we receive a report, whether internally or from an external source, of a perceived or actual activity that may constitute modern slavery.

As set out in our Human Rights Policy, where we become aware of any grievance that we may have caused, or contributed to, we will seek to remediate following the UNGP's guidance. We are aware that being part of a global economy means we have suppliers we engage with outside our jurisdictions and that we do not have direct control of or directly deal with (e.g. Tier 2 suppliers etc.). Similarly, should we become aware of a grievance where we are directly linked to an event, we will also follow the UNGP's guidance.

#### Reporting a grievance

Grievance mechanisms are the cornerstone of the Modern Slavery Remediation Framework. It is designed to record and resolve adverse impacts we may have caused or contributed to as part of our activities.

We are committed to listening. We 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 or have occurred.

We have a dedicated channel for team members and suppliers and other eligible whistleblowers to raise concerns, including human rights related concerns. All reports received are confidential and matters deemed to be protected disclosures are managed in accordance with our Whistleblower Policy as directed by our dedicated Whistleblower Committee. Our team members receive annual training on our Whistleblower Policy and procedures and the Whistleblower Policy is publicly available on our websites.

#### Our Supplier Code of Conduct

Our Supplier Code of Conduct sets out the minimum standards of behaviour that we expect our suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.

Suppliers are required to read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate the Supplier Code of Conduct to related entities, their own suppliers and subcontractors who support them in supplying to us, so they are aware of, understand and comply with it.

Suppliers' ability to meet or exceed standards detailed in the Supplier Code of Conduct will be a key consideration when we make procurement decisions as we expect all suppliers to adhere to it.

Specifically, our Supplier Code of Conduct states:

*We expect suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities. As such, our suppliers should comply with all relevant laws including the Modern Slavery Act 2018 (Cth) and international human rights and modern slavery laws, declarations and any other mandatory human rights, due diligence legislation or modern slavery reporting requirements. Suppliers must not engage or support any trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.*



# 6. ASSESSING THE EFFECTIVENESS OF ACTIONS

Crown adopts a group-wide continuous improvement approach to everything we do. Assessing the effectiveness of our actions to identify and address modern slavery risks in our operations and supply chain is no exception.

Our fundamental processes in pursuit of minimising our modern slavery risks and enhancing the identification of such risks lies in our:

- policies and processes which set the standards for our behaviours,
- documented and reported risk assessment processes,
- enhanced and well publicised escalation processes that allow eligible whistleblowers to raise reports via our dedicated whistleblower platform.

Reinforcing this is our Board-approved Risk Management Framework adopting the three lines of defence model which is designed to support the execution of the risk management across our organisation.

**1st Line**  
All Team Members

All employees form the first line of defence and assume ownership of and accountability for the management of the material risks faced and effective implementation of the Risk Management Framework.

**2nd Line**  
Risk Management Function, Financial Crime & Risk Assurance Team, Compliance and Responsible Gaming

Provides oversight, support and advice to Management in respect of the Risk Management Framework and associated Frameworks and Policies.

**3rd Line**  
Internal and External Audit Independent Assurance

Provides independent assurance to the Board via the Audit & Risk Committee.

During this reporting period our three lines of defence have tracked the effectiveness of our actions in:

Crown's **1st Line** function by:

- reviewing our supplier due diligence process and associated policies
- reviewing and where appropriate enhancing training in key areas pertinent to modern slavery risks and then tracking the completion rates of such training.

Crown's **2nd line** function by:

- provided oversight and assurance on the Modern Slavery Statement to ensure factual accuracy of Crown's Modern Slavery Risk Assessment approach and accompanied reporting.

Crown's **3rd Line** function by:

- conducting an independent internal audit of the Procurement & Supply Chain risk controls, and due diligence process associated with modern slavery.

As we mature in our approach to modern slavery, our processes will continue to evolve and our ability to assess the effectiveness of our actions will continue to be enhanced.



# 7. CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

To assist in carrying out its responsibilities, during the reporting period the Crown Resorts Limited Board utilised the following standing committees:

- Audit and Finance Committee
- Board Risk, Compliance and PlaySafe Committee
- Betfair Board of Directors

The Crown Board also has dedicated Audit and Finance Committees and Risk, Compliance and PlaySafe Committees for Crown Sydney and Crown Perth and for Crown Melbourne.

We are committed to ensuring that our approach to modern slavery is standardised across each of our reporting entities. We continue to engage with relevant business units across our various properties on human rights and modern slavery in several different ways including:

- targeted supplier due diligence
- discrete support services in relation to worker rights
- internal audits of various business unit operations, policies and processes
- dedicated training activities.

The identification, assessment and management of modern slavery risks as outlined in this Statement remain within the business units. These activities help embed our human rights approach across all our entities. In addition to our 'business as usual' daily consultation processes in a broader context, we also consulted with representatives across the business. These representatives come from a number of pertinent business units including Environmental, Social & Governance; Procurement & Supply Chain; Internal Audit; Group Compliance and Regulatory Affairs; Corporate Communications ; Legal and our Finance teams.

Crown London publishes a stand-alone Modern Slavery Statement under the Modern Slavery Act 2015 (UK).



# APPENDIX A

## Our 2024 reporting entities

This joint statement is made on behalf of Crown Resorts Limited (ABN 39 125 709 953), an Australian Modern Slavery Act reporting entity. Each reporting entity, other than Crown Resorts Ltd, is a wholly owned subsidiary of Crown Resorts Ltd.

Australian Reporting Entity	Description
Betfair Australasia Pty Ltd (ABN 77 110 084 743)	Holding company, immediate parent of Betfair Pty Ltd
Betfair Pty Ltd (ABN 30 110 084 985)	Online betting exchange operator in Australia
Burswood Limited (ABN 36 075 071 537)	Holding company
Burswood Property Trust (ABN 35 491 489 282)	Trustee: Burswood Nominees Limited, Owner of Burswood Resort (Management) Ltd
Capital Club Pty Ltd (ABN 85 078 251 439)	Owner and operator of Capital Golf Club
Crown (Western Australia) Pty Limited (ABN 73 095 976 275)	Holding company
Crown CCR Group Holdings One Pty Ltd (ABN 73 128 565 793)	Holding company, parent of Crown Asia Investments Pty Ltd
Crown Entertainment Group Holdings Pty Ltd (ABN 82 126 028 822)	Holding company, main head office operating entity
Crown Resorts Foundation Private Ancillary Fund (ABN 25 454 812 059)	Private Ancillary Fund
Crown Melbourne Limited (ABN 46 006 973 262)	Owner and operator of Crown Melbourne
Crown Sydney Property Pty Ltd (ABN 12 166 326 861)	Owner and operator of Crown Sydney property
Crown Sydney Gaming Pty Ltd (ABN 97 166 326 843)	Owner of Crown Sydney's gaming licence
Crown Resorts Limited (ABN 39 125 709 953)	Holding company
Jemtex Pty Ltd (ABN 78 109 861 663)	Holding company, immediate parent of Betfair Australasia Pty Ltd
Melbourne Golf Academy Pty Ltd (ABN 81 086 098 339)	Operator of Melbourne Golf Academy



