

Crown Resorts Ltd Code of Conduct







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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.

Message from the Crown Resorts CEO



Character and conduct matter for organisations just as much as they do for individuals.

As we respond to continued change across the industry, the way in which we do business at Crown has never been more important.

Our Code defines how we do business. It explains what we stand for and informs the behaviours we need to deliver on our strategy and ambition to create world-leading experiences for our guests.

At the heart of operating as a truly responsible business is complying with the spirit of our Code. Along with our Purpose and Values it directs us to fair, balanced and ethical decision making, which is key to our success.

If you see or know of something that you believe doesn't meet the requirements of the Code, you should not hesitate to raise your concerns.

Crown is committed to a culture where concerns may be raised with confidence and safety. We need to create and maintain a safe environment for our people, so that when things go wrong, concerns are readily raised, allowing us to put things right.

I am deeply committed to our Code, as is the Executive Committee and our Board. All Crown directors, team members and contractors are expected to behave in accordance with our Code.

Please read our Code carefully. Please take it to heart so that we maintain the trust and confidence of our stakeholders and support of the communities in which we operate.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Carruthers', written over a white background.

Ciarán Carruthers
Chief Executive Officer
Crown Resorts Limited

Message from the Crown Resorts Chairman



Crown Resorts is one of Australia's largest entertainment groups and a leading operator and developer of integrated resorts in Australia.

Crown has a vital role to play in the communities in which we operate. As one of Australia's largest employers, creating employment and training opportunities is critical to the wider economy and to the future of the hospitality industry.

We have a long history of supporting the community through meaningful investment, which has driven positive change and impact in the indigenous, arts, medical research and education spaces. We also have a significant role to play in setting a new standard for our industry and becoming a world-leader in the delivery of safe and responsible gaming and entertainment.

The licences we hold across the jurisdictions we operate in are a privilege. Compliance with our regulatory obligations is a non-negotiable and compliance with our social obligations is a must, as we look to rebuild trust with our stakeholders, including our guests, team members, governments, regulators and communities.

The Code sets the standards of conduct for our organisation. It also sets out Crown's Can We? Should We? test, which is a critical guide for our day-to-day decision making.

By understanding and following the Code, each and every one of us is helping Crown to restore trust with our stakeholders and helping to create exceptional experiences with respect and care for our communities.

Yours sincerely,

William P. McBeath

William P McBeath

Chairman

Crown Resorts Limited

Our purpose and values

At Crown, we have always been about creating exceptional, world-class experiences for our guests 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.



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 guests, 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

About the Code of Conduct

Our Code underpins Crown's commitment to ethical behaviour, responsible business practice and good governance.

Underpinned by our values, our Code ensures we meet the expectations of our stakeholders, including our guests, team members, governments, regulators and communities in which we operate.

Our Code should guide your daily decisions, encourage you to perform at your best, and inspire you to live our values while acting responsibly.

How to use the code

You are expected to read, understand and comply with our Code and to complete all training made available to you on our Code. Our Code applies to all directors, team members and contractors in all areas of Crown Resorts and its controlled entities ('Crown'). The Code also sets out the standards of conduct we expect from our suppliers and other third parties we engage with.

Our Code covers a range of important aspects of how we do business, including behaving ethically and in accordance with the law.

Use our Code when you're faced with an ethical problem, a difficult decision, or to help you understand the standard of behaviours required of you.

If you see or know of something that you believe doesn't meet the requirements or spirit of the Code, you should immediately raise your concerns. Crown is committed to fostering a culture where concerns may be raised with confidence and protecting you from any detriment in doing so. It is crucial that we have a safe and open environment so that when things go wrong, we can quickly put things right.

If you are responsible for leading a team (*'People Leader'*), you also play a critical role in raising awareness of the Code, modelling behaviours and fostering a culture where our team members feel safe and are encouraged to raise concerns. Take the time to bring our Code to life by referring to our Code, the standards of conduct set out in our Code and our Can we? Should we? test in your team meetings, conversations and day-to-day decision making. Ensure your teams understand their obligations to report any actual or suspected breaches of the Code and the steps they need to take to report them.

Can We? Should We?

Asking Can We? and Should We? in your day-to-day roles will help guide you with ethical and responsible decision making.

If you think the answer may be "no" to any of these questions, you could be facing a potential integrity issue or breach of our Code. In these situations, you are expected to reach out and seek guidance from your People Leader, your 'one up' manager or any other support channel available to you (see *'Enabling a Speaking Up Culture'* on page 22 for more details on how to raise concerns).

Can We? Should We?



“Am I sure this behaviour complies with the law?”

“Am I sure this behaviour complies with Crown’s policies and processes?”

Yes

No

Should We?

“Is this the right thing to do for our stakeholders, including our guests, team members, regulators, government, shareholders and the communities we operate in?”

“Is the behaviour in line with our health, safety, and environmental standards?”

“Would I be comfortable telling my family or friends about this, or seeing it in the media?”

“Is it right that I am the most senior person who knows about this issue?” (OR “Do I need to report it to someone else?”)

If the answer is NO to any of the above questions you should report the situation to the appropriate person.

We act with integrity



It is core to our values that we act with integrity and act responsibly, take accountability for our actions, and make decisions that consider the risks to our business and communities.

- **We protect our community and the integrity of our business**, and strive to ensure our casino operations are free from criminal influence, including through meeting our anti-bribery and corruption, and anti-money laundering and counter-terrorism financing obligations, and managing fraud.
- **We respect and safeguard the assets of Crown** and use company assets responsibly and for legitimate business purposes only.
- **We properly manage the intellectual property rights** of Crown and respect the intellectual property rights of others.
- **We care about privacy**, confidentiality, and information security by keeping information secure and protecting the personal information of our guests and team members from unauthorised access and disclosure.
- **We establish strong and ethical business relationships** with others and never make or receive, or enable others to make or receive, improper payments, benefits, or gains.
- **We make sure our personal interests**, including relationships and our business alternate employment, financial and other interests don't conflict with, or have the potential to conflict with, our work duties or Crown's best interests. We excuse ourselves from any decision making that may be, or perceived by others to be, a conflict of interest.
- **We take steps to avoid any association** with individuals or groups who are known to be, or reasonably suspected of being, involved in unlawful or improper activities given that such associations may reflect adversely on Crown's reputation in the community, and our own reputations.
- **We don't take advantage of our positions** or the opportunities arising from them, including by using Crown information for personal gain, by causing detriment to Crown or its guests, or by passing such information to others.
- **We exercise caution when offering or accepting gifts**, tips, gratuities, or hospitality to ensure it does not and, is not perceived to improperly influence a business outcome, and we never accept gifts, tips, gratuities or hospitality from our gaming patrons or their associates in breach of our regulatory and licensing obligations.
- **We know and meet our team member conditions**, including under any specific team member licenses we hold and all laws applicable to Crown.
- **We do not act in a manner which could be seen as Crown interfering with political processes**, and we ensure that public confidence in Crown is not compromised by undue perceptions of political influence. Crown and its subsidiaries do not make monetary or in-kind political donations. We also ensure that any political donations we make in our personal capacity comply with any applicable laws.
- **We take care when we speak on behalf of Crown** or release information externally and don't speak on behalf of Crown unless we are authorised to make public comments.
- **We care about the reputation of Crown's products and services**, so when we speak about them or release any information about Crown externally, we do so responsibly. This includes making sure that Crown's communications are lawful, accurate, fair, complete and clear, and do not breach any confidentiality or privacy requirements.
- **We make sure that any posts, comments or other content for which we are responsible on social media comply with Crown's policies** and procedures, even when these arise in our personal capacity.

What this means for you

- Always act in the best interests of Crown and be honest in your dealings with others, including your People Leader, colleagues and our guests.
- Look out for and report any actual or suspected activities.
- Never offer or accept any bribes, pay-offs, facilitation payments; secret, unjustified or inflated commissions; kickbacks, or any like-payments or improper benefits. Report any instances of suspected or actual instances of bribery or corruption (*you will be protected from any retaliation where you do so in good faith*).
- Never offer or receive gifts, tips, gratuities or hospitality from our gaming patrons or their associates in breach of our regulatory and licensing obligations. All other gifts, tips, gratuities or hospitality must not be excessive or inappropriate and must be reported, disclosed and/or approved in accordance with policy.
- Do everything you can to avoid actual and perceived conflicts of interest. If they arise, disclose them (*to your People Leader, People & Culture manager, Compliance manager or through another channel*), and ensure appropriate steps are taken to manage this. This may include removing yourself from a situation (*for example, a decision-making process*).
- Immediately disclose (*to your People Leader, People & Culture manager, Compliance manager, or through another channel*) any current associations with a group or an individual that is engaged in unlawful or improper activities.
- Ensure Crown's intellectual property and confidential information is managed in accordance with our policy and procedures. This includes protecting it, and not disclosing, using, disposing or profiting from it without authorisation, even after your employment or engagement with Crown comes to an end.
- Always treat the personal and confidential information of others with respect. Any personal information we collect, use, store and disclose must be managed in accordance with our policies, procedures, and the law.
- Use Crown property and resources for their intended purposes and not for personal gain. Ensure any business expenses you incur on behalf of Crown are for legitimate business-related purposes and don't knowingly damage or misappropriate Crown assets or allow others to.
- Don't offer or promise to offer funds for a charity or community cause with the intention to inappropriately influence anyone. Always check the credentials of the charity organization before you engage in any dealings with them.
- Do not make monetary or in-kind political donations (*for example, team member time, provision of goods and services, or payments for events where all or part of that payment will be used for political purposes*) in any jurisdiction on behalf of Crown, or where it might be perceived that you are acting to advance any interest of Crown. If you become aware of any such donations or are in doubt about whether a payment may be a political donation, contact your Compliance Manager for guidance, either directly or via your People Leader.
- Ensure you understand how we communicate externally and who is authorised to make public statements. If you are unsure, speak with your People Leader or refer inquiries, including from the media to a Corporate Affairs representative.
- Report any content published by others on social media in relation to Crown that you think is misleading, deceptive, inappropriate or wrong.

Key policies & more information

- Crown Resorts Designated Business Group Joint Anti-Money Laundering and Counter-Terrorism Financing Program
- Crown Resorts Limited – Anti-Bribery and Corruption Policy
- Crown Resorts Limited – Technology Asset Management Policy
- Crown Resorts Limited – Technology Data Management Policy
- Crown Resorts Limited – Privacy Policy
- Crown Resorts Limited – Records Management Policy
- Crown Resorts Limited – Gift, Tips and Gratuities Policy
- Crown Resorts Limited – External Communications and Social Media Policy
- Crown Resorts Limited – Employee Licensing and Gambling by Employees Policy
- Crown Resorts Limited – Conflict of Interest Policy

We work together



We promote and maintain a respectful way of working with our colleagues, guests and suppliers and are committed to conducting business with the highest standards of integrity and professionalism.

- **We promote diversity and inclusion**, consider individuals, and recognise their values.
- **We maintain a safe, inclusive and respectful working environment** and ensure our suppliers and business partners understand that we have the same expectations of them.
- **We ensure our workplace behaviour is conducted legally**, ethically, honestly, responsibly and with the highest standards of integrity and professionalism.
- **We have zero tolerance for bullying**, harassment, sexual harassment, discrimination, or behaviour that is not compatible with Crown values.
- **We set standards of behaviour** in accordance with Equal Employment Opportunity (EEO) law and do not tolerate anti-social, illegal, or inconsistent standards of behaviour expected by Crown and our guests.
- **We work constructively with regulators**, law enforcement agencies and other bodies and ensure we are open and transparent as we do so.
- **We do not accept behaviour that creates a risk** to health and safety (*including physical or mental health*) or causes another person to feel unsafe.

What this means for you

- Demonstrate fairness and respect in all your dealings. Everyone has a part to play in actively and intentionally behaving with inclusion in mind. Be collaborative and supportive towards each other.
- People Leaders are responsible for demonstrating leadership by addressing inappropriate behaviour when they see or hear it.
- Don't engage in unacceptable actions or behaviours that involve harassment, discrimination or bullying. If you experience such inappropriate behaviour, you are encouraged to discuss it with your People Leader, People & Culture manager or Compliance manager, or report it through another channel.
- Report any engagement with inspectors or regulatory authorities to your People Leader, Compliance or Regulatory Relationship Manager.
- If you become aware of unacceptable behaviour by a guest or a team member, you should notify a security staff member immediately. In the case of a team member their People Leader should also be notified.
- Make sure that our suppliers and third-party business partners understand that we have the same expectations of them to maintain a safe, inclusive, and respectful working environment.

Key policies & more information

- Crown Resorts Limited – Workplace Behaviour Policy
- Crown Resorts Limited – Supplier Code of Conduct
- Crown Resorts Limited – Unacceptable Behaviour Policy
- Crown Resorts Limited – Regulator and Law Enforcement Agency Engagement Policy



We care



Core to our values is fostering strong and inclusive relationships built on respect. We care deeply about doing the right thing for our stakeholders, including our guests, team members, governments, regulators and communities we operate in and the environment. We are committed to guest wellbeing and providing impactful programs and responses to increase safer play and reduce gambling-related harms.

- **We care about delivering a safe and responsible gaming environment** for our guests, through meeting our legal and social obligations and identifying and implementing industry best-practice in the management of gambling-related harm and the responsible service of alcohol.
 - **We are dedicated to embedding our commitment to guest wellbeing** throughout the organisation and continuously developing ways to minimise and prevent gaming-related harm through awareness, detection, assistance, and support for our guests.
 - **We foster strong and inclusive communities** by empowering others, improving the wellbeing of the people we meet at work and enhancing our work environment. We encourage all Crown team members to support and partake in these initiatives.
 - **We are committed to respecting human rights** in accordance with the United Nations Guiding Principles on Business and Human Rights. We acknowledge our obligation to prevent or mitigate adverse human rights impacts in our operations and supply chain and remediate where harm is caused.
 - **We do not tolerate the use of modern slavery** practices and expect you to create and maintain a work environment that respects human rights, is free from unlawful discrimination and harassment.
- **We make meaningful contributions toward reducing our environmental impact.** We do this through pursuing sustainable procurement, energy, water and waste practices across our operations.
 - **We're committed to protecting the health, safety and wellbeing** of the team members who work with us and the people who visit and use our facilities.

What this means for you

- Be aware of guests who are potentially displaying observable signs of gambling harm and provide them with support as soon as practical. If unsure how to provide support, direct the concern to your manager or alert The Responsible Gaming Team located in the Responsible Gaming Centre in each of our properties.
- Make sure you complete your Responsible Gaming and Responsible Service of Alcohol training (*if required in your role*) and comply with Crown's Responsible Gaming Code of Conduct and other policies and procedures.
- Understand and follow all applicable CrownSAFE health, safety and wellbeing and policies, standards, minimum requirements, and procedures that apply to your work.
- Care for yourself, your colleagues and anyone who could be impacted by your work. Stop any work that appears unsafe and immediately report a concern, hazard, or incident if you become aware of it.
- Don't engage in unacceptable actions or behaviours that involve harassment, discrimination, or bullying.
- Make sure that our suppliers and third-party business partners understand that we have the same expectations of them to maintain a safe, inclusive, and respectful working environment.

- Work in a way that respects the human rights of all people who are touched by our operations. This includes working to ensure that slavery and human trafficking aren't taking place anywhere in our business.
- Take proactive steps to minimise environmental impacts associated with your work. Work with and identify opportunities to mitigate your environmental footprint with suppliers, partners, and guests. Report potential or actual environmental incidents.

Key policies & more information

- Crown Resorts Limited – Health, Safety and Wellbeing Policy
- Crown Resorts Limited – Responsible Gaming Policy
- Crown Resorts Limited – Responsible Service of Alcohol Policy
- Crown Resorts Limited – Environmental Policy
- Crown Resorts Modern Slavery Statement





We strive for excellence



We are passionate about creating exceptional, world-class experiences for our guests. We strive for excellence to deliver on our objectives, enhance our reputation and attract and retain talented team members.

- **We value our guests.** We seek to build and maintain our guests' trust. We do not misrepresent what we can deliver, or the benefits our services can provide. We always try to do the right thing by them, applying the Can We? Should We? test when unsure.
- **We inform guests about the terms and conditions** of the services we provide (*and any changes to them*), in clear and simple language.
- **We communicate openly, fairly and in a timely manner** with our guests and business partners.
- **We value guest feedback** and ensure all guest complaints are managed and responded to in accordance with relevant consumer and privacy obligations.
- **We handle complaints in accordance with our service standards** and proactively work to promptly resolve them.
- **We take action, where appropriate, to implement operational changes** and improvements to address any systemic causes of complaints.
- **We do the right thing by our guests**, meet our obligations, and live our values, applying the Can We? Should We? test when unsure. We work efficiently, effectively and within our delegated authority.
- **We value our team members.** We provide benefits and privileges at our properties and expect they are used appropriately and responsibly.
- **We ensure a safe and enjoyable working environment** and take a zero-tolerance approach to the use of illicit substances in the workplace.
- **We do not permit our team members to gamble at any of our properties.**

What this means for you

- When things go wrong, be open and honest, so we can put things right.
- Always make sure that the information you provide about our services is accurate. Ensure you tell guests all the things they need to know about the services they acquire from us.
- Take proactive steps to ensure that our guests have a positive experience.
- You are responsible for applying for your casino team member license (*including renewals*) where required. This includes completing and providing the necessary documentation.
- You are not permitted to perform any function of a licensed team member without a license.
- Make sure you have completed your training on how to manage and resolve issues concerning Guest Feedback (*where required*).
- Try to resolve guest complaints at first point of contact or where appropriate, Use your judgment to escalate complaints to the relevant manager or department where appropriate.
- Act fairly and reasonably in all our guest and business dealings.
- Use team member benefits and privileges responsibly.
- Do not use illicit substances during your work or attend work when your ability to function at work is impaired.
- If you suspect a minor has been left unattended on Crown premises, notify Security or refer to the police, Child Protective Services or Crisis Care.
- You must not gamble at any Crown property, or cause other persons to gamble or place bets on your behalf.

Key policies & more information

- Crown Resorts Limited – Accounting Policy
- Crown Resorts Limited – Unacceptable Behaviour Policy
- Crown Resorts Limited – Customer Feedback Policy
- Crown Resorts Limited – Employee Licensing and Gambling by Employees Policy
- Crown Resorts Limited – Issue Management and Breach Reporting Policy

Enabling our 'Speak-Up' Culture

Creating and maintaining a 'speak up' culture at Crown is incredibly important for all of us. This will ensure our team members; suppliers and third parties feel safe to raise concerns; where issues are raised no matter how small they may seem and where we are open to feedback and have a 'lessons learned' mindset so that we can make things right where we get them wrong and continuously improve our practices (*including our processes, controls and policies*).

If you see or suspect a violation of the law, this Code, any of Crown's policies, or have any concerns in relation to any 'Should we?' related matters, it is important that you Speak Up. You should always feel comfortable asking a question or reporting a concern using whichever channel you prefer.

Zero-tolerance towards retaliation

Crown does not tolerate retaliation against any individual (*including a team member, contractor, director or third party*) who raises a concern, including in relation to a possible violation of the law, this Code or Crown policies, or those who participate in an investigation.

Any team member who retaliates against an individual who has raised a concern or who prevents another individual from raising a concern will be subject to disciplinary action.

What to Expect

Where a disclosure is made, Crown will need to make preliminary enquiries in order to determine whether the matter falls under our Whistleblower Program.

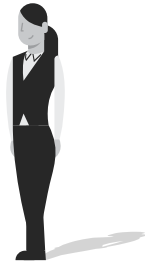
In these instances, an independent party will manage the process, review any information received and ensure that matters are investigated in a reasonably efficient manner in accordance with the Crown Resorts Limited Whistleblower Policy. Appropriate support will also be provided to an Eligible Whistleblower who makes a disclosure and who requests support.

It is noted that while not all matters will require administration through our Whistleblower program, at Crown, all matters and concerns raised are treated seriously and will be handled with care throughout the enquiry, investigation and resolution process.

Key policies & more information

[Crown Resorts Limited Whistleblower Policy](#)

You can raise your concerns with:



1. Your People Leader or another People Leader



2. Any team member of a support function including Compliance, Risk, People & Culture or Legal



3. Any member of the Internal Audit team



4. Any member of the Executive team or Company Secretary



5. A relevant Regulatory Body (see reference below*)

***Sydney** – NSW Independent Casino Commission (NICC) or the Department of Liquor and Gaming NSW

***Melbourne** – Victorian Gambling and Casino Control Commission (VGCCC)

***Perth** - Gaming and Wagering Commission (GWC) or the Department of Local Government, Sport and Cultural Industries

Other ways you can raise your concerns:

If you would prefer to raise your concern confidentially or anonymously you can contact **Core Integrity**, Crown's independent and confidential Speak Up service via the following methods:



PHONE

1800 305 796
(within Australia)



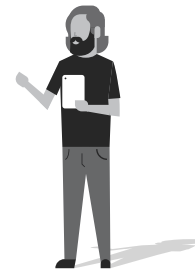
EMAIL

crownspeakup@coreintegrity.com.au



MAIL

PO Box 730,
Milsons Point,
NSW, 1565



SCAN

Core Integrity





Crown Resorts Limited ACN 125 709 953