



Crown Resorts Limited Anti-Bribery and Corruption Policy

Crown Resorts Limited ACN 125 709 953

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1. Document Control

Policy Title	Crown Resorts Limited – Anti-Bribery and Corruption Policy
Policy Owner	Group EGM Financial Crime Risk
Summary	This policy reflects Crown’s purpose and values and its commitment to operating with the highest levels of corporate integrity and preventing Bribery and Corruption in all forms wherever and with whomever Crown conducts business.
Effective Date	1 August 2023
Last Review Date	December 2022
Next Review Date	June 2024
Approved by	Crown Resorts Limited Board of Directors Crown Melbourne Limited Board of Directors Burswood Nominees Limited Crown Sydney Gaming Limited Aspinall’s Club Limited Betfair Pty Ltd
Approval Date	29 June 2023

2. Definitions

ABAC Officer means the Group Executive General Manager (**EGM**) – Financial Crime Risk.

Associate means any Third Party individual or organisation who is not a Team Member and who performs, or plans to perform, work for or on behalf of Crown, including:

- (a) agents;
- (b) brokers;
- (c) business partners;
- (d) consultants;
- (e) contractors;
- (f) joint venture partners or joint venture entities (and their employees);
- (g) sub-contractors;
- (h) suppliers;
- (i) stakeholders;
- (j) vendors; and
- (k) other representatives, including those who act in a fiduciary capacity for Crown.

Bribery or Bribe means the act of offering, promising, giving, accepting or requesting any gift, fee, reward or other benefit to or from any person, as an inducement for the person to perform an action or refrain from acting in relation to the performance of that person's duties.

A bribe can include money, non-cash gifts, political or charitable contributions, loans, expenses, reciprocal favours, business or employment opportunities, entertainment, hospitality, other direct or indirect benefits and unauthorised or unlawful facilitation payments to a person or to their family or friends.

Conflict of Interest is as defined in the Conflict of Interest Policy (as amended from time to time).

Conflict of Interest Policy means:

- (a) for Team Members of Crown London Aspinalls, the Crown London Aspinalls Conflict of Interest Policy (as amended from time to time);
- (b) for Team Members of Betfair, the Betfair Pty Limited – Conflict of Interest Policy (as amended from time to time);
- (c) for Team Members of all other Crown Group companies – the Crown Resorts Limited Conflict of Interest Policy (as amended from time to time).

Corruption or Corrupt means the misuse of power or position for private gain. This can include dishonest or fraudulent behaviour or Bribery.

Crown, Crown Group or Crown Resorts Group means, for the purpose of this Policy, Crown Resorts Limited and all of:

- (a) Crown Melbourne Limited (Crown Melbourne);
- (b) Burswood Nominees Limited (Crown Perth);
- (c) Crown Sydney Gaming Pty Limited (CSG);

- (d) Crown Sydney Property Pty Limited (CSP)
- (e) Aspinall's Club Limited (Crown London Aspinalls); and
- (f) Betfair Pty Limited (Betfair).

Crown Resorts Board means the board of directors of Crown Resorts Limited.

Due Diligence means the process to further assess the nature and extent of the Bribery risk and help Crown make decisions in relation to specific transactions, projects, activities, business associates and personnel.

Eligible Whistleblower is defined in the:

- (a) Crown London Aspinalls – Whistleblower Policy (as amended from time to time) for Crown London Aspinalls Team Members; or
- (b) Crown Resorts Limited - Whistleblower Policy (as amended from time to time) for all Crown Team Members and Betfair Team Members.

Facilitation Payment means an unofficial payment made to a Public Official or Team Member to expedite or secure performance of a non-discretionary, routine governmental action that falls outside the official processes established by the relevant government agencies.

Political Donation is as defined in the Crown Resorts Political Donations Policy.

Policy means this Crown Resorts Limited Anti-Bribery and Corruption Policy (as amended from time to time).

Public Official means a person (or a close associate of a person, for example a corporate entity or family/relative) holding a domestic or foreign legislative, administrative or judicial office, whether by appointment, election or succession, or any person exercising a public function, including for a public agency or public enterprise or any official or agent of a public domestic or international organisation or any candidate for public office.

Team Member means any person performing duties on behalf of Crown, whether or not directly employed or contracted by Crown and includes directors and officers and permanent, casual, fixed term, temporary, volunteer or agency workers.

Third Party means any person, whether a natural person, an organisation or any other entity, that is independent of the Crown Group.

Secret Commission means the receipt of financial or a non-financial benefit from a Third Party as an inducement to influence the conduct of the recipient, without disclosing that commission to the recipient's principal.

Whistleblower Policy means:

- (a) for Team Members of Crown London Aspinalls, the Crown London Aspinalls – Whistleblower Policy (as amended from time to time); or
- (b) for Team Members of all other Crown Group companies, the Crown Resorts Limited Whistleblower Policy (as amended from time to time).

3. Overview

3.1. Purpose of Policy

The purpose of this Policy is to ensure Crown Team Members understand:

- (a) Their obligations to minimise the risk of Bribery or Corruption occurring in connection with Crown’s operations;
- (b) Their responsibilities to recognise and deal with Bribery or Corruption; and what to do where a Team Member has any concerns that a fellow Team Member may be acting outside this Policy and/or engaging in unlawful conduct.

3.2. Scope and Application of Policy

This Policy applies to Crown Resorts Group, its Team Members and Associates (where stated).

This Policy applies irrespective of whether an act of Bribery occurs or is attempted in the private or public sector.

3.3. Policy Alignment to Crown Code of Conduct and Values

This Policy has been written to align to the Crown Values, and with the intent to promote the behaviours and mindsets that are outlined in the Crown Code of Conduct¹.

Value	Alignment
We act with integrity	<ul style="list-style-type: none">○ Prescribes key requirements for all of Crown’s Team Members, outlining conduct that is not permitted at Crown.
We work together	<ul style="list-style-type: none">○ Prescribes key requirements for all Team Members to be able to work together in protecting Crown from suspicious activity or wrongdoing by reporting such activity through the established reporting channels.
We care	<ul style="list-style-type: none">○ Prescribes key requirements to ensure in all situations Team Members observe high standards of ethical behaviour and avoid any activity or interest that might reflect unfavourably upon the integrity of Crown.
We strive for excellence	<ul style="list-style-type: none">○ Prescribes key requirements to all Team Members to be open and honest, act fairly and reasonably in all guest and business dealings.

¹ Team Members of Crown London Aspinalls should refer to the Crown London Aspinalls – Code of Conduct.

4. Policy

4.1. Policy Statement

Crown is committed to complying with the laws of the jurisdictions in which it operates and acting with integrity. Crown takes a zero tolerance approach to acts of Bribery or Corruption by its Team Members and Associates. Crown, its Team Members and Associates are prohibited from engaging in any form of Bribery or Corruption and must comply with applicable Anti-Bribery and Corruption laws.

The Crown Resorts Board is fully committed to the adoption of a zero tolerance Anti-Bribery and Corruption Policy. The Board and senior management team will continue to foster a culture within Crown in which Bribery or Corruption is never acceptable.

4.1.1. Conflicts of Interest

- (a) A Conflict of Interest may create a risk of Corruption as a Team Member's personal interest may conflict with the interests of Crown. This is particularly important when we are dealing with government or regulatory bodies and/or Associates.
- (b) Crown Team Members must try to avoid any potential, perceived or actual Conflict of Interest while acting on behalf of, or employed by, Crown. Where a Conflict of Interest cannot be avoided, the Conflict of Interest must be approved in line with the Conflict of Interest Policy.
- (c) Where Team Members are employed directly by:
 - (i) Crown London Aspinalls, they must comply with the Crown London Aspinalls – Conflict of Interest Policy.
 - (ii) Betfair, they must comply with the Betfair Pty Limited – Conflict of Interest Policy.
 - (iii) Any other Crown Group companies, they must comply with the Crown Resorts Limited – Conflict of Interest Policy.

4.1.2. Gifts, Hospitality, Tips and Gratuities

- (a) Crown Team Members must not give, offer or receive any gifts, hospitality, entertainment and/or similar benefits that could be considered to influence a business decision or secure an unfair business advantage. This is particularly important when we are dealing with government or regulatory bodies and staff because this may be perceived as Bribery.
- (b) Crown prohibits the Bribery of Public Officials. Where there is any uncertainty around the appropriateness of any gift or entertainment to be provided to a Public Official, Team Members should seek guidance from the ABAC Officer.
- (c) Where Team Members are employed directly by:
 - (i) Crown London Aspinalls, they must comply with the Crown London Aspinalls – Gifts and Hospitality Policy;
 - (ii) Betfair, they must comply with the Betfair Pty Limited – Gifts, Tips and Gratuities Policy; and
 - (iii) Any other Crown Group companies, they must comply with the Crown Resorts Limited – Gifts, Tips and Gratuities Policy.

4.1.3. Facilitation Payments

- (a) Crown prohibits the making of Facilitation Payments, whether directly or through Third Parties to any Public Official.

4.1.4. Political Donations

- (a) Crown Resorts Group prohibits any Political Donation(s) made by Crown or on behalf of Crown by Team Members or Associates.
- (b) All Crown Team Members must comply with the Crown Resorts Limited – Political Donations Policy, as applicable. To the extent that there is any inconsistency between this Policy and the Political Donations Policy, the more conservative policy should be applied.
- (c) Where there is uncertainty on which policy should be applied, Team Members are encouraged to reach out to the policy owners of the Political Donations Policy (Chief Government Relations & Industry Affairs Officer) and the ABAC Officer.

4.1.5. Charitable Donations

- (a) Charitable donations must never be made in an attempt to influence any decisions or gain an improper advantage to Crown's business and must not be used as a means of hiding or camouflaging a Bribe.
- (b) If Crown is considering making a material charitable donation, relevant staff must conduct appropriate Due Diligence on the proposed recipients of such donations to ensure that those funds will not be used for Bribery or Corruption in contravention of this Policy.
- (c) Evidence of appropriate Due Diligence and donation details must be accurately documented by:
 - (i) Crown London Team Members, under the Crown London Aspinalls – Records Management Policy and Documentation Guide;
 - (ii) Betfair Team Members, under the Betfair Data Retention Standard; or
 - (iii) all other Crown Group Team Members under the Crown Resorts Limited – Record Management Policy.

4.1.6. Secret Commissions

Crown prohibits the payment or acceptance of Secret Commissions by its Team Members or Associates.

4.2. Exceptions

- 4.2.1.** In certain limited circumstances, Team Members can request an exemption to this Policy where strict adherence to the Policy would cause hardship (for example when a Team Member's safety is at risk overseas).
- 4.2.2.** Where an exception to this Policy is sought, a request must be considered and approved by each of the ABAC Officer and Chief Governance and Compliance Officer.
- 4.2.3.** Where an exception is requested, all decisions must be documented in line with the Crown Resorts Limited – Record Management Policy.

4.3. Reporting of Concerns

- 4.3.1.** All Crown Team Members and Associates have a duty to speak up where they have a concern around a potential instance of Bribery and Corruption as well as any other behaviour or wrongdoing which may be in contravention of this Policy.
- 4.3.2.** Team Members and Associates are encouraged to promptly report when they have a reasonable belief that there has been any attempted, suspected or actual Bribery or any violation of this Policy or Crown's Anti-Bribery and Corruption processes utilising the following channels:

Principal channels for reporting Bribery or Corruption concerns	
Financial Crime Risk	ABAC Officer (who is the Group EGM – Financial Crime Risk)
Crown’s Whistleblower Protection Officer	Email: whistleblower.protection.officer@crownresorts.com.au
Core Integrity, Crown’s independent Speak Up service	Email: crownspeakup@coreintegrity.com.au Phone: 1800 305 796 Online: qrs.ly/CrownSpeakUp

- 4.3.3. For Team Member’s wishing to raise reports anonymously and confidentially Crown’s Whistleblower program may be utilised for the reporting of Bribery and Corruption. Information on how Crown’s Whistleblower program may apply is outlined in the Crown Resorts Whistleblower Policy.
- 4.3.4. For Team Members employed directly by Crown London Aspinalls, information on how the Whistleblower program may apply is outlined in the Crown London Aspinalls – Whistleblower Policy.
- 4.3.5. All reports of known or suspected Bribery or Corruption will be handled by Crown sensitively, with appropriate confidentiality and in accordance with any applicable legislation which protects the legitimate personal interests of Team Members.
- 4.3.6. Crown will appropriately investigate all allegations of suspicious activity or wrongdoing and take legal and/or disciplinary action where appropriate.
- 4.3.7. Suspected and confirmed incidences of Bribery and Corruption and breaches of this Policy will be referred to the ABAC Officer, who will report to the Financial Crime Oversight Committee (FCOC) (unless protections under the Whistleblower Policy apply).

4.4. Consequences for Breaches of Anti-Bribery and Corruption Laws

- 4.4.1. Violation of Anti-Bribery and Corruption laws can result in severe fines and criminal penalties for Crown, its Team Members and Associates, and reputational damage for Crown.
- 4.4.2. A Team Member who, in the reasonable opinion of Crown, has committed an act of Bribery or Corruption will be subject to disciplinary action, which may include dismissal. Where appropriate, Crown will refer the matter to law enforcement and/or the relevant regulatory authorities.

4.5. Periodic risk-based review

- 4.5.1. This Policy shall be reviewed when:
 - (a) there is a material change in Anti-Bribery and Corruption laws; or
 - (b) there is a material change in the environment or circumstances in which the Crown Group is operating; or
 - (c) if none of the above occur, at least every second calendar year.

5. Further Information

Any questions regarding this Policy should be directed to the Group ABAC Officer and Financial Crime Risk.

6. Relevant Legislation, Regulations and other Guidance Documents

Document Title
<ul style="list-style-type: none">● Criminal Code Act 1995 (the Criminal Code) (Cth) (AUS)● Crimes Act 1900 (NSW) (AUS)● Crimes Act 1958 (VIC) (AUS)● Criminal Code Act 1913 (WA) (AUS)● Corporations Act 2001 (Cth) (AUS)● Casino Control Act (NSW) (AUS)● Casino Control Act (VIC) (AUS)● Casino Control Act (WA) (AUS)● Crimes Legislation Amendment (Combating Corporate Crime) Bill 2019 (AUS)● Treasury Laws Amendment (Enhancing (Whistle-blower Protections) Bill 2018 (AUS)● Australia Attorney-General's Department Draft Guidance on Adequate Procedures to Prevent Foreign Bribery (AUS)● Bribery Act 2010 (UK)● US Foreign Corrupt Practices Act (US)● ISO 37001 – Anti-bribery management systems● OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transaction (International)

7. Relevant Crown Policies and Documents

Document Title
<ul style="list-style-type: none">● Crown Resorts Limited – Code of Conduct● Crown Resorts Limited – Gifts, Tips and Gratuities Policy● Crown Resorts Limited – Conflicts of Interest Policy● Crown Resorts Limited – Team Member Compliance Policy● Crown Resorts Limited – Whistleblower Policy● Crown Resorts Limited – Political Donations Policy● Crown Resort Limited – Designated Business Group Anti-Money Laundering and Counter-Terrorism Financing Policy● Crown London Aspinalls – Code of Conduct● Crown London Aspinalls – Conflict of Interest Policy● Crown London Aspinalls – Gifts and Hospitality Policy● Crown London Aspinalls – Whistleblower Policy● Crown London Aspinalls – Records Management Policy and Documentation Guide● Betfair – Conflict of Interest Policy● Betfair – Gifts, Tips and Gratuities Policy

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

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

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

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

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

Crown Resorts Limited

August 2023

Appendix A – Document History

Document History

Version	Date	Modified by	Comments
1.0	Feb 2020	-	Group policy created combining Anti-Bribery Policies from Crown Melbourne and Crown Perth.
1.1	22/09/2021	Stewart Ridsdale, Compliance Coordinator – Gaming Machines	Previous policy version 1.0 has been uplifted to align to Policy Uplift Program. In addition, the Political Donations Policy will be retired, based on section 4.2.3.
2.0	December 2022	Financial Crime Risk	Revised and uplifted policy, as part of Policy Uplift Program.
2.1	22/05/2023	Compliance	Table in s4.3 updated to replace Stopleveline with Core Integrity.
2.2	June 2023	Financial Crime Risk	Revised to extend coverage of the policy to Crown London Aspinalls and Betfair and reflect introduction of Crown Resorts Political Donation Policy.
2.3	August 2023	Financial Crime Risk	Amendments to 4.1.1, 4.1.2 & 4.1.3 to factor in Crown Resorts and Crown Melbourne Board feedback.