



# Crown Limited

## Diversity, Equity, and Inclusion Policy

Crown Limited ACN 125 709 953

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## 1. Document Control

<b>Policy Title</b>	Crown Resorts Diversity, Equity, and Inclusion Policy
<b>Policy Owner</b>	Group General Manager Organisational Development
<b>Accountable Executive</b>	Chief People Officer
<b>Summary</b>	Crown is committed to creating and maintaining a diverse and inclusive workforce and to promote the importance of equality. We celebrate and embrace diversity which enables us to attract, retain, motivate, and develop the best talent.
<b>Effective Date</b>	23-Aug-23
<b>Last Review Date</b>	Jul- 23
<b>Next Review Date</b>	Aug-24
<b>Approved by</b>	Crown Resorts Limited Board

## 2. Definitions

**Belonging** is the result of an inclusive environment where employees can be themselves. It is when individuals feel a sense of acceptance for who they are and the value they bring to their work - they feel heard, seen and recognised for the unique value they bring.

**Crown Resorts** means Crown Resorts Limited ACN 125 709 953 and/or its related bodies corporate.

**Crown** means Crown Resorts and each of Crown' majority owned Australian subsidiaries from time to time, including as at the date of this Policy:

- a. Crown Melbourne casino and entertainment complex, operated by Crown Melbourne Limited;
- b. Crown Perth casino and entertainment complex, operated by Burswood Nominees Limited; and
- c. Crown Sydney casino and entertainment complex, operated by Crown Sydney Gaming Pty Ltd.

**Diversity** refers to the differences we bring to the organisation. The differences we bring can include our demographic characteristics such as gender identity, sexual orientation, cultural identity, disability, and age. It can also refer to attributes we gain through our lived experiences such as working or thinking styles, education, marital and parental status, religion, skills, and expertise.

**Discrimination** means unfavourable treatment of a person due to that person's protected attribute, including an attribute that a person has, has had in the past, is presumed to have, or may have in future, and includes direct and indirect discrimination. Where Direct discrimination happens when a person, or a group of people, is treated less favourably than another person or group because of their background or certain personal characteristics. Indirect Discrimination occurs when there is an unreasonable rule or policy that is the same for everyone but has an unfair effect on people who share a particular attribute.

**EEO (Equal Employment Opportunity) Law** means Australian legislation that everyone should have equal access to employment opportunities based on merit. This access to equal employment should be without fear of discrimination, bullying or harassment.

**Harassment** means any conduct of an individual towards another individual based on an attribute of that other individual that is likely, in all the circumstances, to humiliate, offend, intimidate, or distress the other individual.

**Inclusion** is about providing an environment where everyone feels safe, valued, and respected regardless of the differences they have. It is recognising the value of these differences and unique experiences that can help to achieve positive and innovative business outcomes.

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

## 3. Policy Overview

### 3.1. Purpose of Policy

This Policy outlines Crown’s commitment to embrace and cultivate a culture of diversity, equity, inclusion and belonging, where diverse backgrounds, experiences and perspectives of our people are respected, included, and valued and they are treated with dignity and respect. This policy describes our guiding principles, implementation objectives, roles and responsibilities to diversity and inclusion and how these are promoted and embedded in our workplace.

### 3.2. Scope and Application of Policy

This policy applies to all Crown Board of Directors, Executive Team, and team members.

The principles set out in this policy will also be reflected in all Crown documentation, processes and branding, contracts, and work plans. Third parties of Crown including contractors, volunteers and suppliers are expected to behave in accordance with this policy.

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

The Crown Code of Conduct governs ethical behaviour at Crown.

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

Value	Alignment
We act with integrity	<ul style="list-style-type: none"><li>○ Outlines the desired behaviour of team members to ensure that all employees are treated equally and fairly in all circumstances</li></ul>
We work together	<ul style="list-style-type: none"><li>○ Outlines the expectation of collaborating with team members, regardless of their background, social and professional identities.</li></ul>
We care	<ul style="list-style-type: none"><li>○ Describes how Crown creates an inclusive and equitable working environment, promotes psychological safety, and creates a genuine sense of belonging for its team members.</li></ul>
We strive for excellence	<ul style="list-style-type: none"><li>○ Describes how Crown acknowledges that a diverse workforce is instrumental to innovation and productivity that leads to excellence.</li></ul>

## 4. Policy

### 4.1. Background

Crown recognises that a diverse and inclusive workforce brings innovation, diversity of thought and increased productivity and is essential for high performance.

Crown complies with Equal Employment Opportunity (EEO) law and adopts a zero-tolerance approach towards unlawful workplace discrimination, either directly or indirectly, against any person based on their social identity e.g., Aboriginal and/or Torres Strait Islander background, age, gender, disability, caring responsibilities, LGBTIQ+ status, culture, or faith.

Crown has defined strategies to promote diversity and inclusion including the Reconciliation Action Plan, Gender Action Plan, Crown Pride Action Plan and the CROWNability action plan and regularly reports progress.

### 4.2. Policy Principles

This Diversity and Inclusion Policy is based on the following principles:

#### **4.2.1 Attracting and Retaining Diverse Employees**

- Crown endeavors to build a diverse workforce to benefit our People and customers and reflect the communities in which we live and operate.
- Crown aims to eliminate systemic and individual bias throughout all stages of the employment life cycle with policy and processes designed to deliver fair and equitable outcomes.

#### **4.2.2 Creating a Safe Working Environment**

- We must ensure that Crown's People management practices and processes are designed to listen, engage, and understand our employees and respond appropriately to their individual needs and changing circumstances. They should be free from bias and guided by the principles of equal opportunity to ensure decisions and initiatives affecting our people are based on equity. Our People management practices and processes include:
  - Recruitment and selection
  - Talent and succession planning (including promotion and retention)
  - Performance and reward
  - Learning and development
  - Flexible work practices
  - Employment benefits
- Crown is committed to building an inclusive culture where team members can experience a psychologically safe and respectful working environment where their contributions are welcome and valued, and they feel a genuine sense of belonging.

#### **4.2.3 Measurable objectives, Monitoring and Reporting**

- Crown will establish measurable objectives, including key performance indicators (KPIs) for the diversity and inclusion strategies, initiatives, and programs as they are developed.

- All diversity and inclusion programs and initiatives will be monitored regularly, and the Diversity and Inclusion Team will report on progress and make recommendations to the broader People and Culture Team.
- The Diversity and Inclusion team will ensure consistent reporting to the Crown Boards and Property People and Culture Committees on established milestones and metrics, with updates provided as required, and a minimum of once annually.

### 4.3. Implementation

To effectively implement the principles and achieve our Diversity and Inclusion objectives at Crown, we will undertake the following actions:

- Develop and maintain a comprehensive Diversity, Equity, and Inclusion strategy that establishes objectives, executes activities, and continuously monitors and reports progress.
- Ensure that senior leaders within our organization serve as champions for diversity and inclusion initiatives, providing clear guidance, allocating resources, and offering support to foster a diverse and inclusive workplace.
- Implement our Gender Action Plan to achieve gender and pay parity across all levels of the organization.
- Set annual measurable objectives, determined by the Board, for gender diversity in the composition of the Board, Senior Leadership, and the broader workforce, and regularly report on progress toward these objectives.
- Support and encourage the application of flexible work arrangements and provide various leave options for employees.
- Conduct annual assessments and reviews to address gender pay equity.
- Communicate clear expectations and responsibilities to both people leaders and employees, emphasizing a zero-tolerance approach to discrimination, harassment, vilification, and victimization. Encourage employees to act as Upstanders to create a positive and inclusive environment.
- Establish a reporting mechanism to identify policies or systemic inequities and create an inclusive experience for both employees and customers. Encourage individuals to share information about their individual circumstances, provide appropriate support, and address any identified inequities.
- Foster engagement and empowerment of employees through the establishment of Employee Support Groups.
- Provide inclusive leadership training to support people leaders in becoming more inclusive and fostering better understanding of diverse team experiences.
- Ensuring employees involved in recruitment have undertaken training in non-discriminatory recruitment practices to ensure that we recruit from a diverse pool of candidates.
- Promote awareness of Equal Employment Opportunity obligations and key policies, such as the Discrimination, Harassment and Bullying Policy, Sexual Harassment Policy, Whistleblower Policy, among others, to foster a safe and inclusive workplace.
- Execute our CROWNability (Access and Inclusion) Action Plan to ensure accessibility for our customers, employees, and communities. This includes making reasonable workplace

adjustments, providing equal access to training and flexible working arrangements, and addressing any potential recruitment barriers for people with disabilities.

- Create career and leadership development opportunities specifically tailored for employees from historically excluded and underrepresented groups.
- Foster an environment where inclusive communications are utilized to educate, encourage dialogue, and raise awareness of our diversity, equity, and inclusion objectives across the organization.
- Support and engage all employees in the design and delivery of our Reconciliation Action Plan, working towards reconciliation goals.

#### 4.4. Enforcement

This policy will be enforced by Crown’s People and Culture team. Any employee who believes that they have been discriminated against or harassed on the basis of their age, disability, race, sex, intersex status, gender identity and sexual orientation in certain areas of public life, including education and employment can file a complaint with their HR business partner. All complaints will be investigated promptly and thoroughly.

## 5. Responsibilities

This Policy is managed primarily by the People and Culture Team.

Role	Responsibilities
All employees	<ul style="list-style-type: none"> <li>• Being aware of their obligations under this policy, the Code of Conduct and any associated policies and procedures</li> <li>• Taking accountability for their own behaviour and ensuring their behaviour complies with this policy and the Crown values.</li> <li>• Where identified, report unacceptable behaviour that inhibits diversity, equity and inclusion to a manager or a member of the People and Culture team, or through other designated complaints or disclosure avenue in addition to the Whistleblower program.</li> <li>• Whistleblower to raise concerns</li> <li>• Expected to raise concerns where they don’t feel that the behavior is not displayed</li> <li>• Complete compulsory training</li> </ul>
The People and Culture Team	<ul style="list-style-type: none"> <li>• Providing feedback and advice to team members relating to both positive and negative behaviours that affect this policy.</li> <li>• Governance of all people-related decisions to ensure that bias, exclusion, discrimination, or vilification does not affect any decisions relating to employees.</li> <li>• WGEA Reporting data submit and present yearly to the Board</li> <li>• Remuneration review – like for like</li> </ul>



Role	Responsibilities
The Chief People Officer and/or their nominated delegate	<ul style="list-style-type: none"> <li>• Ensuring Crown workplace policies are aligned to the our diversity, equity, and inclusion objectives.</li> <li>• Cascading those objectives to appropriate management levels and business units to enable their effective implementation.</li> <li>• Reporting to the Board annually on Crown workforce profile and performance against objectives.</li> </ul>
All Supervisors and Managers	<ul style="list-style-type: none"> <li>• To make decisions based on merit and without bias</li> <li>• Monitor the work environment and call out inappropriate behaviour when they see it.</li> <li>• Escalating misconduct and potential breaches of this policy when the matter is outside their delegation of authority.</li> <li>• Encourage diversity, equity, and inclusion in their teams.</li> <li>• Demonstrating leadership by role modeling appropriate behaviour to ensure a strong and diverse culture.</li> </ul>

## 6. Potential Breach Consequences

Failure to adhere to this Policy and where behaviour is deemed as unlawful discrimination of a person because of their social identity, can be treated as serious misconduct and may be subject to disciplinary action, up to and including termination of employment in line with the process detailed in the Workplace Behaviour Policy and its associated procedures. The team member may also be subject to criminal or civil proceedings.

## 7. Policy Review and Approval

This Policy will be reviewed by the Policy Owner annually, or as close to annually as practicable, or as required as a result of changes to the internal or external environment.

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

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

## 8. Feedback and Questions

Crown employees and contractors may provide feedback or ask any questions about this document by contacting their relevant People and Culture Team member representative.

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

Document Title
<ul style="list-style-type: none"><li>• Australian Human Rights Commission Act 1986</li><li>• Age Discrimination Act 2004</li><li>• Sex Discrimination Act 1984</li><li>• Racial Discrimination Act 1975</li><li>• Racial Hatred Act 1995</li><li>• Disability Discrimination Act 1992</li><li>• Workplace Gender Equality Act 2012</li><li>• Fair Work Act 2009</li><li>• Work Health and Safety Act 2011</li><li>• Disability and Inclusion Act 2014</li><li>• Multicultural Act 2000</li><li>• State-based anti-discrimination laws<ul style="list-style-type: none"><li>○ New South Wales - Anti-Discrimination Act 1977</li><li>○ Victoria - Equal Opportunity Act 2010</li><li>○ Western Australia - Equal Opportunity Act 1984</li></ul></li></ul>

## 10. Relevant Crown Policies and Documents

Document Title
<ul style="list-style-type: none"><li>• Code of Conduct</li><li>• Workplace Behaviour Policy</li><li>• Team Member Conditions</li><li>• Managing Workplace Behaviour and Performance Procedure</li><li>• Supplier Code of Conduct</li><li>• Human Rights Policy</li></ul>

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*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.*

*August 2023*

## Appendix A: Document History

Version	Date	Modified by	Comments
1.0	2021		
2.0	2023	Harleen Oberoi, Head of DEIB and Talent	Update to policy