

Crown Resorts Ltd Supplier 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.

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 Supplier Code of Conduct

Crown Resorts views its suppliers as partners and cares about the way our suppliers do business. We aim to model good business practices, promoting a collaborative relationship where Crown 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 Crown Resorts (Crown) expects its 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 must read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate this Code to related entities, their own suppliers and subcontractors who support them in supplying to Crown, so they are aware of, understand and comply with this Code.

Suppliers' ability to meet or exceed standards detailed in this Code will be a key consideration when Crown makes procurement decisions as we expect all suppliers to adhere to this Code. This will happen regardless of whether or not the Code has been formally incorporated into a particular contract with the supplier. This Code does not preclude Crown from including additional social, environmental, ethical, privacy or cyber security requirements into procurement contracts to address specific risks of an agreement.

In this Code, "supplier" means any individual or entity (including consultants) that supplies goods or services to Crown or its controlled entities. In this Code, workers refer to Crown team members, contractors, agencies, migrants and temporary staff of the supplier and of its related entities.



Business Integrity & Ethics

Crown acts with integrity and adheres to good corporate governance practices. When we make procurement decisions, we do so for the good of our business and our guests. We expect the same from our suppliers.

Anti-Bribery, Money Laundering and Corruption

Crown takes a zero tolerance approach to acts of bribery, money laundering or corruption by our team members and any of our associates, including our suppliers.

Conflicts of Interest

A conflict of interest exists where a person's loyalties are divided or might be perceived to be divided. Our team members and suppliers must guard against any perceived, potential and/or actual conflict of interest while employed by, or acting on behalf of, Crown.

Gifts, Gratuities, Hospitality and Entertainment

Gifts, gratuities, hospitality and entertainment must not be given or received with the intention of influencing a business decision or securing an unfair business advantage. However, these exchanges are acceptable if they:

- are reasonable in cost;
- are proportionate to the business relationship;
- are given in good faith; and
- comply with applicable law and Crown's policies.

Confidentiality and Privacy

Crown must comply with the Privacy Act 1988 (Cth), which includes the Australian Privacy Principles. To adhere to these principles, we have a clear and up-to-date policy that sets out how we collect, store, use and disclose personal information.

Import Duties and Requirements

When goods are imported into Australia, relevant local and international laws are designed to protect people, businesses and ecosystems. Crown Resorts requires its suppliers to contribute to this protection by adhering to these laws.

Competing fairly

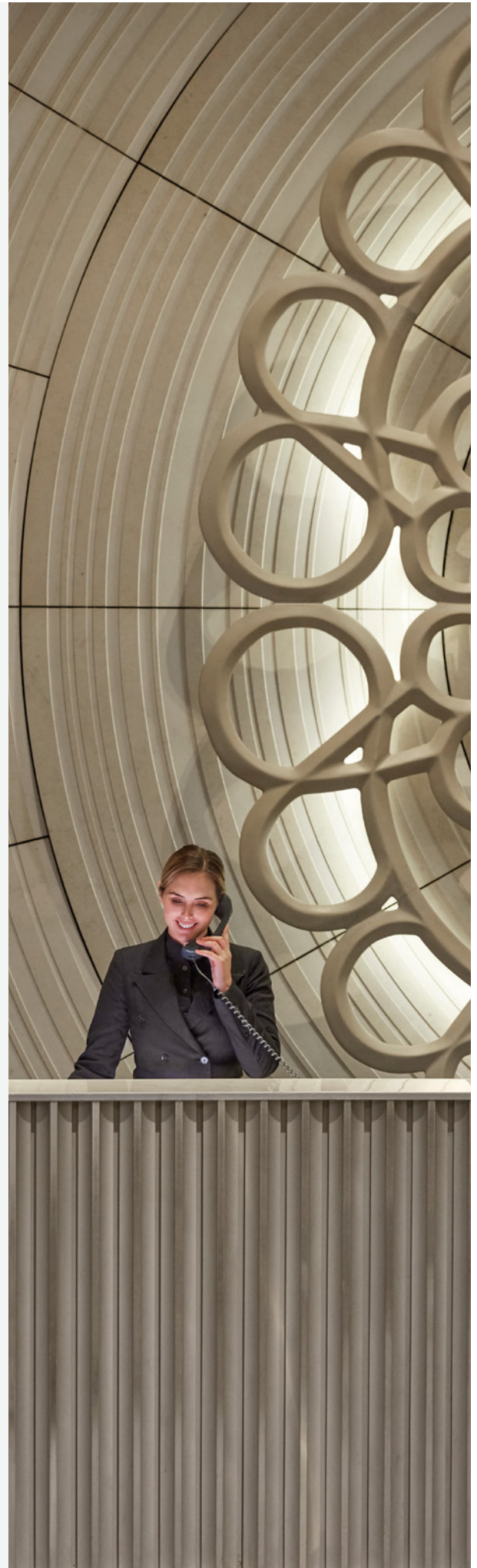
Crown is committed to fair competition and does not tolerate anti-competitive activity in any form.

Privacy & Media Comment

Crown cares about the reputation of our 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. Suppliers must contact Crown Resorts Communications prior to any media engagement that involves Crown on communications@crownsresorts.com.au

As a supplier, we expect you to:

- comply with all relevant legislation, particularly in relation to anti-bribery, anti-corruption and anti-money laundering, as well as the Crown Resorts' Anti-Bribery and Corruption Policy;
- comply with all relevant Australian and international laws relating to the importing of goods and complete all relevant documentation accurately and honestly;
- never engage in fraudulent, corrupt or collusive activities, directly or indirectly;
- properly manage your risk, governance and compliance obligations;
- maintain accurate records of your financial transactions and follow up any discrepancies between delivery and receipts in a timely manner;
- protect confidential, private or commercially sensitive information relating to Crown and our team members and other stakeholders, and only use such information for a proper purpose and in accordance with the terms and conditions of any applicable agreements;
- where appropriate, have relevant policies and procedures that stipulate appropriate governance practices and ethical behaviours for your employees and suppliers, including a grievance policy for employees, suppliers and clients and a whistleblower policy which is accessible in relevant jurisdictions;
- respect the privacy of our customers;
- promote a collaborative relationship allowing us to work together to resolve issues in a timely and respectful manner;
- clearly document and declare any sub-contracting arrangements.



Comply with Laws

We expect our suppliers to comply with the law in the countries where they operate and take appropriate measures to ensure that suppliers in their supply chain also adhere to these expectations.

Labour and Human Rights

At Crown, we respect and support human rights as set out in the International Bill of Human Rights, and the fundamental rights principles in line with the International Labour Organization core conventions.

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.

Non-discrimination

Crown expects its suppliers to not engage in or support discrimination in hiring and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personally associate with a person who possesses or is thought to possess any of these attributes.

Bullying, Harassment and Disciplinary Practices

It is expected that our suppliers foster a workplace free of discrimination, violence, harassment and bullying and prohibits physical, sexual, psychological or verbal harassment or abuse. Clear definition and communication to workers' disciplinary policies and procedures in support of these requirements is a must.

Freedom of Association

Suppliers must respect workers' freedom of association and allow employees to freely associate with, join or form industrial organisations and engage in legal industrial action without interference, discrimination, retaliation, or harassment (or choose not to do any of these).

Crown expects its suppliers to not discriminate, harass, intimidate, or retaliate against workers for being members of a union or participating in trade union activities, and provide worker representatives with access to their workplace.

Wages and Benefits

It is expected that our suppliers provide proper and timely payment to your employees, subcontractors and agents, including equal pay for equal work and appropriate overtime rates set in compliance with the Fair Work Act of 2009 (Cth).



Health & Safety

Our suppliers play a significant role in our business and our commitment to keep each other, our guests and communities safe, secure, and well.

Suppliers must identify and comply with relevant workplace and health and safety laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work.

Suppliers must provide a safe and healthy workplace for their workers and anyone who could be impacted by their activities. As a minimum, suppliers must:

- identify and comply with all relevant health and safety laws;
- comply with Crown's delivery standards and procedures;
- provide appropriate equipment, resources, instruction, education and training for workers to safely carry out their duties, including personal protective equipment;
- ensure your employees understand and follow health and safety policies, standards and procedures that apply to their work;
- provide a clean and safe workplace;

- comply with Crown's onboarding process when your employee would perform work within Crown premises;
- support workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination;
- accurately record and manage health and safety risks and events;
- implement effective systems to ensure the delivery of products and services meet relevant standards and legislative requirements, and safety considerations are taken into account throughout the product or service life cycle;
- engage with workers, guests, members of the community, and Crown to manage health and safety risks.

Suppliers must prepare for, respond to, manage, and report workplace incidents, injuries, and emergencies, providing medical assistance to impacted parties as required.

Suppliers must have systems, training, and emergency equipment in place to effectively respond to and manage incidents and emergencies. Emergency drills should be conducted regularly or as required by local law, whichever is more stringent.



Environmental Considerations

Crown is committed to optimising the resources we use and reducing our environmental footprint, by seeking to responsibly source and pursue opportunities to conserve water and energy usage, where possible in our business and supply chain. We favour investment in solutions that are designed to be sustainable across their life cycle.

We have a strong appetite for partnership with our suppliers to identify ways to minimise the adverse environmental impact on our combined operations and align our environmental strategies.

As such, we expect our suppliers to be compliant with applicable environmental laws, standards, and notices from regulators as well as obtain, maintain, keep current and comply with necessary environmental permits, approvals, and registrations.



Diversity & Inclusion

Crown values diversity and inclusion. Diversity means differences in all forms, both visible and invisible. This includes differences that relate to gender, age, cultural background, disability, religion, and sexual orientation, as well as differences in background and life experience, and interpersonal and problem-solving skills. In line with this, Crown is supportive of suppliers who promote diversity in their supply chain, including;

- those who commit to First Nations procurement targets or engage with social enterprises and minority-owned organisations in the delivery of goods and services;
- those who embrace gender equity, the active promotion of women, initiatives aligned with Crown's Pride Action Plan, and gender pay equity gaps; and
- those who initiate procurement activities aimed at improving the lives of people with disability or who are disadvantaged.



Cyber Security & Privacy

Cyber Security and Privacy are non-negotiable parts of how we work. We expect our suppliers to work with us to protect the data and systems used by and for Crown and our guests.

Suppliers must implement organisational practices and technical security measures that align with Crown's security policies, including managing and monitoring their supply chain to protect Crown and our guests' data and systems from breaches and unauthorised access.

Where Crown requires suppliers to meet specific security requirements, including the use of Crown's approved solutions or services, these requirements must be met. When suppliers become aware of a data or network breach, they must immediately notify Crown. Suppliers must treat Crown's and our guests' data as confidential information and only use that data for the purpose of providing services to Crown.

Crown's Privacy Statements outline our privacy commitment and explain how we collect, use, disclose and protect personal information of individuals we deal with. Suppliers who collect, use, store or have access to personal information held or provided by Crown must have adequate processes and effective technical security controls in place to protect personal information from misuse, interference, loss, unauthorised access, modification, and disclosure.

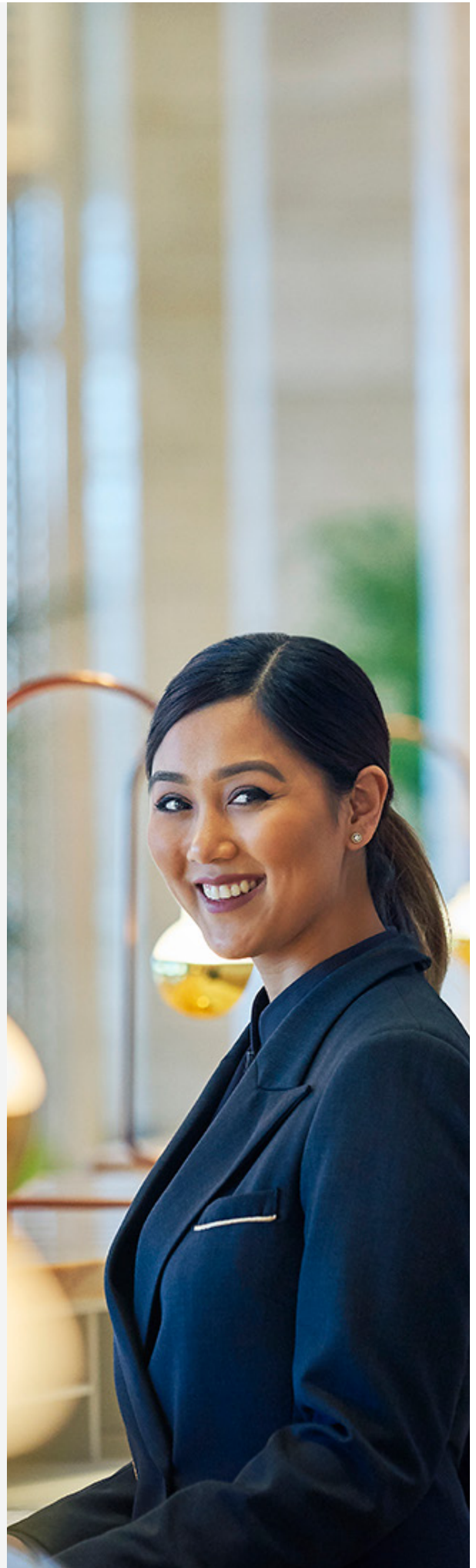
Suppliers must have adequate processes and controls to monitor compliance with applicable security and privacy laws and contractual obligations. Suppliers must not do anything which would cause Crown to be perceived as acting inconsistently with our Privacy Statements and Crown's Privacy Principles.

Due Diligence & Risk Monitoring

Crown is committed to monitoring compliance against its internal standards and policies. Crown implements thorough due diligence and risk monitoring processes as part of its corporate governance.

As a minimum, suppliers are expected to:

- where appropriate, have policies and procedures that identify, manage and control relevant risks associated with your operations, including those related to your supply chain, HR policies and practices, health and safety, corporate governance, environmental practices, human rights (including modern slavery) and business ethics;
- identify and evaluate potential risks relating to critical incidents, emergencies and business continuity;
- have relevant plans (e.g. Emergency Management Plan, Business Continuity Plan, Data Recovery Plan) to protect people's lives, the environment, information and your business' property and operations during a critical event or emergency;
- as appropriate, regularly test, review, and make appropriate updates to relevant policies, procedures and plans;
- regularly assess risks in your operations and facilities and, where possible, those in your supply chain; and
- in relation to human rights impacts, provide accessible grievance mechanisms and commit to appropriate remedy when you have caused or contributed to harm.



Compliance with this Code, Law & Regulations

Fundamental to this Code is an expectation that all suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business.

The expectations outlined in the Code are not intended to supersede or alter the supplier's regulatory and contractual obligations. Crown expects all existing and new suppliers to commit to the Code. Suppliers should check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this Code.

Suppliers are expected to self-assess their compliance with this Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation, or review. You are encouraged to raise any concerns, discuss and seek clarification accordingly in relation to any elements of the Code with your contact in Crown.

We reserve the right to periodically assess your practices that relate to this Code of Conduct. This may include asking you for information, visiting your site, asking you to conduct a self-assessment or working with you to identify and implement best practice and continuous improvement.

We expect our all existing and new suppliers to:

- commit to the Code;
- check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this code;
- provide full, open and honest responses if we ask you for relevant information; and
- complete any agreed plans for correcting and improving your operations.

Continuous Improvement

Suppliers are encouraged to go beyond compliance to applicable laws and take responsibility to continually improve social and environmental conditions and ethical behaviour.

Reporting Misconduct, Unethical Behaviour or Suspected Corruption

Creating and maintaining a ‘speak up’ culture at Crown is incredibly important to us and helps to ensure our team members, suppliers and third parties feel safe to raise concerns.

If you see or suspect a violation of the law, or this Code, or have any concerns in relation to any of the obligations in this Code, it is important that you Speak Up.

Crown’s Whistleblower Policy applies to all our team members and suppliers and should be used as a mean of escalation.

You are encouraged to report to Core Integrity, Crown’s independent and confidential Speak Up service. The service is available 24 hours a day, seven days a week.

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)



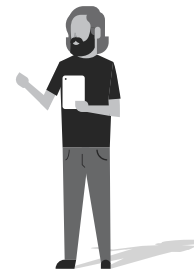
EMAIL

crownspeakup@coreintegrity.com.au



MAIL

PO Box 730,
Milsons Point,
NSW, 1565



SCAN

Core Integrity



Further Information

If you would like any further information about our Supplier Code of Conduct, please email us at vendorc@crownmelbourne.com.au

All relevant policies pertaining to this code:
<https://www.crownresorts.com.au>



Crown Resorts Limited ACN 125 709 953