



# Crown Resorts Limited COVID-19 Vaccination Policy

Crown Resorts Limited ACN 125 709 953  
A public company limited by shares

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# 1. Our Commitment and Purpose

Crown Resorts Ltd (**Crown**) is committed to providing a safe and healthy working environment for all our employees, contractors, suppliers, and patrons. For as long as COVID-19 is active in our community it presents a risk to our safety, operations, industry, and way of life.

Under work health and safety laws, Crown is required to do all that is reasonably practicable to reduce or eliminate risks to the health and safety of its employees, patrons, and others at our workplace. Beyond this duty, Crown is committed to ensuring the health and safety of all Crown Attendees. As part of this commitment, Crown places paramount importance on its duty to provide and maintain a safe workplace for its workers and other persons who may attend a Crown Premises, so far as is reasonably practicable. This duty includes minimising the risks associated with Crown Attendees being exposed to COVID-19 in the workplace or as a result of Crown's business or undertaking. This risk is significantly reduced by vaccination, as is the risk of serious illness, hospitalisation and death from COVID-19.

Based on the Australian Technical Advisory Group's immunisation advice, vaccination is an effective measure for reducing the risk and impact of exposure to COVID-19 and multiple types of COVID-19 vaccinations are currently readily available within Australia.

Given the nature of Crown's business and operations, and following a consultation process, Crown is of the view that COVID-19 vaccinations are a critical step towards ensuring a safer workplace, together with the continued use of physical distancing, good hygiene, mask wearing where appropriate and regular cleaning and maintenance as measures to reduce the risks from COVID-19 in the workplace. The ongoing rollout of COVID-19 vaccinations is an imperative additional safety measure that will assist Crown to continue to provide a safe and healthy work environment.

Crown has therefore decided to require that all Crown Attendees who visit a Crown Premises be Fully Vaccinated in accordance with this policy. Crown has established this policy to reflect its respect for individuals with genuine medical reasons for not being vaccinated, balanced against the need to maintain a safe working environment and for ensuring business continuity during these challenging times.

# 2. Applicability and Commencement

## 2.1. Who does this policy apply to?

This policy applies to all Crown Attendees over the age of 16 years old and such other individuals as contemplated in section 3.1.

All companies in the Crown Group within Australia will be required to comply with this policy.

## 2.2. Commencement

Crown acknowledges the differing COVID-19 situations across States and Territories in Australia along with the varying availability of vaccines in some areas. Therefore, subject to any developments in circumstances or applicable public health orders, this policy will take effect on the following dates:

- I. 5 November 2021 in respect of Crown Attendees at Crown Premises in New South Wales and Victoria.
- II. 31 January 2022 in respect of Crown Attendees at Crown Premises elsewhere in Australia.

(each a "**Commencement Date**")

Despite the above dates, Crown must comply with any public health orders issued by the State or Territory Government relevant to a particular Crown Premises. Such public health orders may impose

different or earlier obligations relating to vaccination, and in these situations Crown will comply with and enforce those earlier vaccination requirements.

Each Commencement Date may be varied as notified by Crown in its discretion from time to time.

### 2.3. Variation and Review

Crown may regularly review, amend, rescind or end this policy as necessary to ensure compliance with applicable public health order directives and other applicable legislation to ensure ongoing compliance, suitability, applicability, and safety.

## 3. COVID-19 Vaccination Requirements

### 3.1. Crown Requirements

All Crown Attendees are required to comply with applicable legislation in each jurisdiction of operation, primarily Victoria, New South Wales and Western Australia. Each jurisdiction continuously updates its public health orders, and these must be complied with, including in respect of mandatory vaccination in certain industries or venues. Where any public health order or other applicable legislation in a jurisdiction imposes a vaccination requirement on any individual (such as a patron, supplier or other visitor) who is not a Crown Attendee then this policy is extended to cover such individuals and they will be expected to comply with any such requirements.

This policy is intended to operate in addition to any public health orders implemented by various governments from time to time. All Crown Attendees are expected to comply with these public health orders. To the extent that there are public health orders that impose an additional requirement not set out in this policy or that expressly contradicts this policy, the public health orders take precedence and must be followed.

In addition to any public health orders, Crown requires that from the relevant Commencement Date all Crown Attendees over the age of 16 years old who visit any Crown Premises in Australia are Fully Vaccinated.

### 3.2. Proof of Vaccination

#### **Employees**

Crown Employees will be required to submit Proof of Vaccination to Crown's Human Resources department via the process communicated to Crown Employees from time to time. Proof of Vaccination will be stored in accordance with section 5 of this policy.

Proof of Vaccination must be provided by no later than the relevant Commencement Date or, in the case of Crown Employees who are stood down from their relevant Commencement Date or who have been Fully Vaccinated after their relevant Commencement Date, prior to their first duty, workday or shift following their relevant Commencement Date. If a public health order requires Proof of Vaccination be provided to Crown prior to the Commencement Date, Crown Employees must comply with this requirement by the earlier date.

For employees who are unable to either provide proof of vaccination or refuse to receive the COVID-19 vaccination/s, no shifts or work will be offered or payments will be made (except for approved paid leave) and the employees will be given notice that continuing failure to comply with the policy will result in disciplinary action being taken, including termination of employment.

## **Contractors**

Contractors will be required to provide Proof of Vaccination for inspection, and in some circumstances collection and/or retention, via staff entry, upon arrival at any Crown Premises or via such other process as communicated by Crown. Proof of Vaccination will be required in order to receive a contractor pass and gain entry to all Crown Premises, even if such access is required to access a third-party location (such as a restaurant or apartment). If a public health order requires Proof of Vaccination be provided to Crown prior to the Commencement Date, Contractors must comply with this requirement by the earlier date.

## **Tenants**

To the extent that employees or contractors of Crown Tenants are required to access any Crown Premises, this policy will apply to them as Crown Attendees and Proof of Vaccination may be required to be provided upon arrival at any Crown Premises or via such other process as communicated by Crown.

## **On-Going Requirement**

Crown Attendees will have an ongoing obligation to provide Proof of Vaccination as required by any changes to this policy, noting that any government advice on revaccination or booster programmes will be taken into account.

### **3.3. New Employees**

All prospective and new Crown employees will be required to be Fully Vaccinated prior to commencing employment. Proof of Vaccination will be required as part of the recruitment process and contracts of employment will include requirements to comply with this policy before any offer can be accepted and any work commenced. If a prospective or new Crown employee qualifies for and wishes to seek an exemption, they will need to comply with the procedure set out in section 4.

### **3.4. Supporting Alternative Working Arrangements**

Crown Employees who have booked their first vaccination, or are waiting for their second vaccination, may discuss work from home arrangements with their manager as a temporary arrangement pending their second vaccination, in circumstances where it is reasonable, safe and practical for that employee to work from home.

If a Crown Employee is not Fully Vaccinated, and is unable to or it is impractical for, that Crown Employee to work from home, they may apply to access their leave entitlements or take leave without pay until they are Fully Vaccinated.

### **3.5. Non-Compliance with Policy requirements**

Crown considers vaccination against COVID-19 to be a critical element in reducing the risk of Crown Attendees' being exposed to or transmitting COVID-19 in the Crown Premises both now and into the future.

Accordingly, Crown Attendees who do not comply with this policy will not be permitted entry to any of the Crown Premises. If entry has been obtained mistakenly, without appropriate permission or otherwise, Crown may remove such attendee from any Crown premises immediately.

Crown Employees who do not comply with this policy (excluding those granted an exemption in accordance with section 4) may be subject to disciplinary action, including termination of their employment, due to a failure to comply with this policy (being a lawful and reasonable direction) and / or because they are unable to perform an inherent requirement of their role.

## 4. Exemptions

### 4.1. Requirements for Exemption

Due to the nature and scope of this policy, there will be very limited circumstances in which an exemption may be granted.

#### **Crown Employees and Permanent Contractors**

Unless otherwise communicated by Crown, an exemption will only be granted to Crown Employees and permanent Contractors who are unable to be Fully Vaccinated due to a substantiated temporary or permanent medical contraindication to vaccination against COVID-19 or an acute illness which prevents them from being vaccinated against COVID-19.

#### **All Other Crown Attendees**

For all other Crown Attendees the provision of an Approved Medical Certificate is required.

### 4.2. Request for Exemption

Crown Employees and permanent Contractors who wish to apply for an exemption from this policy on substantiated medical grounds must make an application in accordance with Crown's COVID-19 Medical Exemption Procedure. For further information see Crown's COVID Medical Exemption Procedure (CS416G005C).

### 4.3. Grant of Exemption

The exemption application will be assessed and decided in accordance with Crown's COVID-19 Medical Exemption Procedure. While their exemption application is under review, individuals may apply to take access their leave entitlements or take leave without pay (if eligible).

If an exemption is not granted, the Crown Employee or permanent Contractor will be required to comply with and be subject to the requirements of this policy.

### 4.4. Supporting Alternative Working Arrangements

In instances where an exemption is granted to a Crown Employee, Crown will work with the Crown Employee to determine what (if any) reasonable additional risk control measures are appropriate for that Crown Employee in relation to the transmission of COVID-19 in the workplace.

For Crown Employees who Crown determines they are unable to attend a Crown Premises safely unvaccinated, Crown will support alternative working arrangements, such as working from home, where possible and practical.

Any Crown Employee granted an exemption will be required to comply with any additional controls and/or alternative working arrangements communicated to them either while applying for the exemption or after one has been granted which may include (but is not limited to) taking leave, working from home (if possible) or continuing to work on any Crown Premises with other controls in place such as regular testing, mask wearing and / or restrictions on movement and contact with others. These arrangements will be regularly reviewed.

In circumstances where this is not practical or achievable, such Crown Employees may apply to take accrued Personal Leave, or Annual Leave or Long Service Leave (if eligible). If this Crown Employee applies for and exhausts or has no remaining leave entitlements, Crown will review the employee's continuing employment at that time which may include leave without pay or termination of employment.

## 5. Privacy, Handling of Sensitive Information and Records Management

Privacy is important to us and Crown is dedicated to protecting personal information across all areas of its business.

Crown may request that Crown Attendees provide for collection and storage Proof of Vaccination or otherwise indicate their COVID-19 vaccination status to Crown in accordance with this policy or pursuant to further communications where Crown considers that the collection of such information is reasonably necessary and/or directly related to Crown's functions and activities, in particular the need to prevent and manage COVID-19 at any Crown Premises. Under public health orders in some states/territories, Crown may be required to collect and store Proof of Vaccination.

Any information so provided will be used, handled and stored securely in accordance with the applicable Crown Privacy Policy and any applicable privacy collection statements.

In addition, any information provided by a Crown Employee or permanent Contractor in accordance with section 4 and Crown's COVID-19 Medical Exemption Procedure will be treated confidentially and stored securely in accordance with the applicable Crown Privacy Policy.

## 6. Associated Documentation

CS416G00C5 - COVID Vaccination Exemption Procedure

## 7. Definitions

**Approved Medical Certificate** means (i) the applicable state / territory government medical contraindication certificate signed by a licensed medical practitioner (who meets the criteria set out in any applicable public health order); or (ii) if there is no approved form prescribed by the applicable state / territory government, certification from a licensed medical practitioner that the relevant person is unable to receive a dose, or a further dose, of any Approved Vaccine due to (i) medical contraindication or (ii) an acute medical illness (including where the person has been diagnosed with COVID-19 in the previous 6 months).

**Approved Vaccine** means a vaccine against COVID-19 that has been approved (including provisionally approved) by the Therapeutic Goods Administration.

**COVID-19** means infection and/or disease caused by the SARS-CoV-2 virus.

**Crown Attendees** means:

- (a) Crown Employees who are required to attend a Crown Premises, whether by the nature of their role or following a lawful and reasonable direction by Crown; and
- (b) Contractors who are required to work at or visit a Crown Premises, whether by the nature of their role or following a direction by Crown or their direct employer; and
- (c) Employees and contractors of Crown Tenants to the extent they are required to access a Crown Premises

**Crown Employee** means a person who has a contract of employment with a company in the Crown Group.

**Crown Group** means Crown, its wholly or majority owned (legally or beneficially) subsidiaries and related bodies corporate.

**Crown Melbourne Site** means:

- (a) The entirety of the Crown Melbourne premises at 8 Whiteman St, Southbank VIC 3006 including but not limited to the hotels, casino, restaurants, bars, cafes, shops, office space, recreational facilities and any indoor public spaces.
- (b) The Crown Melbourne premises at 54-58 Vella Drive, Sunshine West, VIC, 3020

**Crown Perth Site** means:

- (a) The entirety of the Crown Perth premises at Great Eastern Hwy, Burswood WA 6100 including but not limited to the hotels, casino, restaurants, bars, cafes, shops, office space and any indoor public spaces.
- (b) The Crown Perth premises at 70 Briggs Street, Welshpool, WA, 6106

**Crown Premises** means any place within Australia used by any company in the Crown Group in the course of conducting its business (whether on a temporary or permanent basis, regardless of whether owned by or within the exclusive control of the Crown Group), including but not limited to the Melbourne Site, Crown Sydney Site and Crown Perth Site.

**Crown Sydney Site** means:

- (a) The entirety of the Crown Sydney premises at 1 Barangaroo Ave, Barangaroo NSW 2000 including but not limited to the hotel, casino, restaurants, bars, cafes, shops, office space and any indoor public spaces.
- (b) The office space occupied by Crown at 30 The Bond, 30-34 Hickson Road, Millers Point, NSW, 2000.
- (c) The Crown Sydney premises at D3 350 Parramatta Road, Homebush, NSW 2140.

**Crown Tenant** means a business which occupies space and operates a business within a Crown Premises pursuant to a lease, licence or similar agreement.

**Fully Vaccinated** means that the complete schedule of an Approved Vaccine has been undertaken. Currently, this means two doses for most vaccines. The number and timing of doses should be in line with the recommendations of the Australian Technical Advisory Group on Immunisation and may differ depending on the Approved Vaccine which is used.

**Proof of Vaccination** means a valid record (not a photograph) that an individual is Fully Vaccinated through provision of (i) an official Australian Government COVID-19 digital certificate, (ii) an Immunisation History Statement from the Australian Immunisation Register (AIR) or (iii) such other evidence as Crown may indicate is acceptable from time to time at its absolute discretion.

### **Crown Resorts Limited**

August 2022

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