



**CROWN  
RESORTS**

Crown Resorts Limited  
ABN 39 125 709 953

2020

# Modern Slavery Statement



## Acknowledgment of Country



Crown acknowledges the Traditional Custodians of the land on which its Australian Resorts are located; where we gather as employees, as friends and as the Crown family. Crown acknowledges and thanks all of the Aboriginal and Torres Strait Islander people and communities who have contributed and continue to contribute to enrich our workplace. Crown acknowledges the Traditional Custodians' kinship lines, their ongoing cultures and connection to the land and waters and we pay respects to Elders past and present, the Gadigal of the Eora Nation (Sydney), Wurundjeri and Bunurong of the Kulin Nation (Melbourne) and Noongar on Whadjuk Country (Perth).

# Executive Chairman's Message

I am proud to present Crown Resorts Limited's first Modern Slavery Statement for the period 1 July 2019 to 30 June 2020 (reporting period).

Crown has prepared this Statement in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) and describes the steps taken by Crown Resorts Limited and its owned and controlled reporting entities to assess and address the risks of modern slavery practices in our operations and supply chains during the reporting period, unless otherwise stated.

We are committed to continuing to focus on building our awareness of modern slavery risk in our operations and supply chain and strengthening the capability of our organisation in identifying and reporting modern slavery risk.

This Statement has been approved by the Crown Board.



**Helen Coonan**  
Executive Chairman

## Reporting Entities covered by this joint Modern Slavery Statement

This Statement is a joint statement made on behalf of the following entities which we have determined are reporting entities for the purposes of the Act:

- Crown Resorts Limited (**Crown**)
- Crown Entertainment Group Holdings Pty Ltd
- Crown Melbourne Limited
- Crown (Western Australia) Pty Limited
- Burswood Limited
- Burswood Nominees Ltd

## Crown's Purpose and Values

Crown's purpose statement is that 'together we create memorable experiences'. Our values are our shared beliefs about what we stand for and how we operate.

At the heart of our purpose and values is people. We celebrate diversity and inclusion in our workplace and broader community, as evidenced by our longstanding commitments to programs including the Indigenous Employment Program, CROWNability and our many partnerships through the Crown Resorts Foundation.

Crown expects those who work for and with Crown to act in accordance with these values.

## Crown's Approach to Human Rights

Crown believes human rights apply to everyone.

For Crown, human rights include the core internationally recognised human rights as contained in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), coupled with the principles concerning fundamental rights in the eight International Labour Organization core conventions as set out in the Declaration on Fundamental Principles and Rights at Work.

Crown acknowledges its responsibility to identify and address modern slavery practices as defined in the Act. Crown also recognises that respect for human rights is connected with other enabling factors, including preventing bribery and corruption, compliance with anti-money laundering and counter-terrorism financing obligations and operating sustainably.

Crown is committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights. Crown acknowledges its obligation to prevent or mitigate adverse human rights impacts in its operations and supply chain and remediate where harm is caused.



### **We do the right thing**

Doing the right thing... is doing right by your colleagues, customers, community and company.



### **We work together**

Working together is... believing in "we before me" and that together we thrive.



### **We act respectfully**

Acting respectfully is... walking in each other's shoes and treating others as you wish to be treated.



### **We are passionate**

Being passionate about what you do is... never giving anything less than your best and loving what you do.

## Impact of COVID-19

The COVID-19 pandemic has had a significant impact on Crown, our operations, employees and the community more broadly. In March 2020, Crown was directed to close its gaming activities and a significant part of its non-gaming operations at Crown Melbourne and Crown Perth.

While Crown progressed its modern slavery program of work during the reporting period, COVID-19 has delayed the completion of modern slavery awareness training and capability building of our employees.

Crown engaged with a number of its suppliers who were impacted by COVID-19 and provided support, including through the provision of contract extensions for expiring contracts and offering more favourable payment terms for suppliers.

Following the directed closures of the Crown Melbourne and Crown Perth properties, approximately 95% of employees were stood down on either a full or partial basis.

Crown established a Hardship Fund to provide additional, targeted financial assistance to employees experiencing serious financial hardship as a result of COVID-19.

We also established a range of other employee support programs such as the Crown Jobs Network, which connected employees with employment opportunities outside of Crown, as well as ongoing access to Crown's assistance and wellness program.

During the reporting period, Crown assisted State Governments with the provision of accommodation for international arrivals in mandatory quarantine and worked with the Victorian Government and an external service provider to provide safe accommodation, at no cost, to those experiencing domestic and family violence during the period of 'stay at home' directions. This assistance continued after the directions were lifted.

## Structure, Operations and Supply Chain

### Structure

Crown is an Australian public company with its ordinary shares listed on the Australian Securities Exchange under the code "CWN". Crown also has Subordinated Notes II which are listed on the Australian Securities Exchange under the code "CWNHB".

As at 30 June 2020, the Crown Group comprised approximately 80 owned and controlled companies.



### More information

Further information on the Crown Group is included in Crown's 2020 Annual Report which is available at <https://www.crownresorts.com.au/Investors-Media/Annual-Reports>.

Each reporting entity, other than Crown, is a wholly owned subsidiary of Crown.

Crown Melbourne Limited and Burswood Nominees Ltd are Australian public companies. Crown Melbourne Limited owns and operates the Crown Melbourne Entertainment Complex (**Crown Melbourne**). Burswood Nominees Ltd owns and operates the Crown Perth Entertainment Complex (**Crown Perth**).

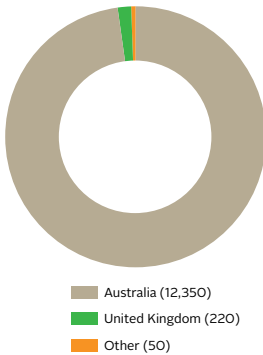
Crown Entertainment Group Holdings Pty Ltd and Crown (Western Australia) Pty Limited are intermediary holding companies between Crown and one or more reporting entities.

### Operations

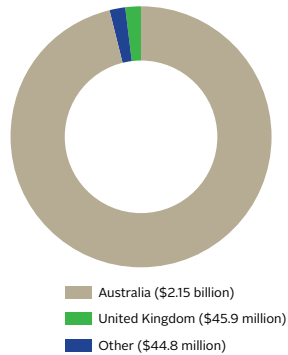
Crown is one of Australia's largest entertainment groups with its core businesses and investments in the integrated resorts sector. Crown makes a major contribution to the Australian economy through its role in tourism, employment and training and through its corporate responsibility programs.

In Australia, Crown owns and operates two of Australia's leading integrated resorts – Crown Melbourne and Crown Perth. Crown Melbourne and Crown Perth are significant employers and are the largest single-site private sector employers in both Victoria and Western Australia respectively, with approximately 12,250 employees and 6,500 contractors at the end of the reporting period located in Australia and approximately 20 employees located in overseas jurisdictions.

**Crown Group Employees by Jurisdiction**



**Crown Group Revenue by Jurisdiction**



Crown Melbourne is Australia's leading integrated resort, featuring luxury accommodation and award-winning dining, world-class gaming, conferencing, shopping and entertainment facilities.

Crown Perth is one of Western Australia's largest tourist destinations, featuring three hotels, world-class convention and gaming facilities, restaurants and bars, a 2,300-seat theatre, and shopping and entertainment facilities.

During the reporting period, Crown was in the final stages of construction of the Crown Sydney Hotel Resort in Barangaroo.

The Crown Sydney Hotel Resort, which progressively opened from 28 December 2020, is Sydney's first six-star hotel featuring 349 hotel rooms and suites, luxury residences, signature restaurants, bars, luxury retail outlets, pool and spa facilities and conference rooms.

Crown also owns the One Queensbridge development site, strategically located adjacent to the Crown Melbourne entertainment complex.

Overseas, Crown owns and operates Crown Aspinalls in London, one of the high-end licensed casinos in the West End entertainment district. At the end of the reporting period, Crown Aspinalls had approximately 220 employees located in London.

Crown's wagering and online social gaming operations comprises Betfair Australasia, a 100% owned online betting exchange, and DGN Games, an 85% owned online social gaming business. At the end of the reporting period, Betfair had approximately 110 employees located in Australia and DGN Games had approximately 30 employees located across Israel and the United States.

Crown's other interests include the following:

- a 50% equity interest in Aspers Group, the UK-based regional casino operator;
- a 50% equity interest in Chill Gaming, a joint venture focussed on innovation and developing new entertainment products; and
- a 20% interest in Nobu, the lifestyle hotel and restaurant brand.

During the reporting period, approximately 96% of Crown's revenue was generated from its Australian operations.

**More information**



For more information on Crown's business operations and strategies is available at <https://www.crownresorts.com.au/Investors-Media/Annual-Reports>.

**Crown owned and controlled operations**

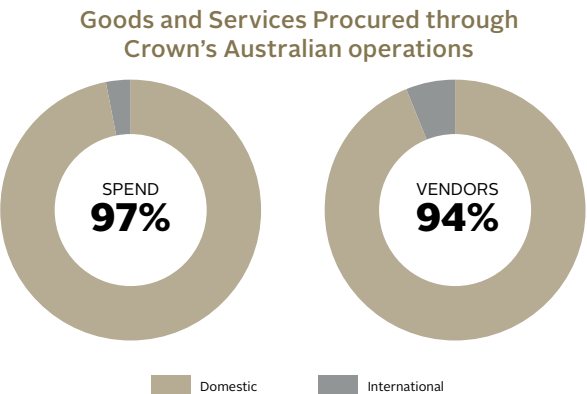


**Supply Chain**

During the reporting period, Crown's Australian owned and controlled operations procured approximately \$1 billion of goods and services from approximately 5,500 direct suppliers (the entities we contract with directly). The total spend during the reporting period was impacted by the reduced operating conditions at Crown's properties as a result of COVID-19.

Approximately 97% of total spend from Crown's Australian owned and controlled operations during the reporting period was with direct suppliers located in Australia. We acknowledge that our direct suppliers may have operations in, or may source goods or services from, jurisdictions which may have a higher risk for modern slavery.

The main categories of goods and services procured by Crown during the reporting period were food & beverage, corporate and financial services, operating supplies and equipment including gaming and IT hardware, and property services.



Crown's owned and controlled overseas operations procured approximately \$10 million of goods and services during the reporting period.

**Risks of Modern Slavery in the Operations and Supply Chain**

**Modern Slavery**

The behaviours and practices which constitute modern slavery are serious human rights violations. Modern slavery practices include trafficking in persons, slavery, slavery-like practices (including forced labour and forced marriage) and the worst forms of child labour.

Modern slavery risk refers to the potential adverse impact that a company can have on an individual or community's labour-related rights.

**Modern Slavery Risk Factors**

The key modern slavery risk factors are categorised as follows:

- vulnerable populations - groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. The level of worker vulnerability, and risk of poor labour practices and exploitation are recognised to be higher in contexts where base skill labour is relied upon.
- high risk categories - products and services regarded as having more significant inherent modern slavery risk- including industries that rely heavily on low-skilled labour and/or involve dirty, dangerous and difficult work.
- high risk geographies - countries or regions which are known to have higher human rights (and modern slavery) risks. High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance.
- high risk business models - business models that rely on third parties for the provision of services - often labour hire. Outsourcing reduces company visibility over third-party recruitment practices and provision of worker entitlements.

Crown acknowledges that where multiple risk factors co-exist there is a higher likelihood that actual harm is being experienced.

Crown is committed to assessing and addressing modern slavery practices in our operations and supply chain.

### **Risk Identification Process**

Having regard to the scale of the operations of Crown's Australian resorts in the context of the Crown group, during the reporting period, the operational and supply chain risk identification processes focussed on these business operations.

Following the introduction of the Act, an internal review of our policies, procedures and processes was undertaken to identify and assess modern slavery risks within Crown's operations and supply chain. The review considered the broader scope of human rights issues connected to or indicative of modern slavery risk, including employee and contractor rights to fair pay and entitlements, safe working conditions and equality and diversity.

This was further supplemented by a risk identification process undertaken by an external specialist human rights and impact adviser.

The risk identification processes involved interviews with representatives from Crown's key business units.

During the reporting period, Crown assessed the modern slavery risks associated with its supply chain to be more significant than those associated with its operations, particularly as the vast majority of Crown's employees are based in Australia with employment arrangements regulated by the *Fair Work Act 2009* (Cth) and relevant modern awards.

### **Supply Chain Risks**

Following completion of the risk identification processes, Crown identified the following key modern slavery risk categories within its supply chain:

- food and beverage;
- cleaning and security services;
- textiles, including uniforms and linen; and
- building contractors and construction materials.

### **Other Risks**

Crown recognises that its casinos may be vulnerable to money laundering and that money laundering may be a risk indicator for modern slavery practices and will consider this intersection of risk as part of its AML/CTF program of work.

Crown will continue to review and refine its modern slavery risk identification processes and identified areas of high risk to determine if Crown's operations or supply chain are linked to any instances of actual modern slavery harm and Crown's ability to remediate any such harm.

## **Reporting Entity Actions**

### **Governance Structure**

The Crown Board is responsible for guiding and monitoring Crown on behalf of its shareholders and is responsible for identifying areas of significant business risk and ensuring arrangements are in place to adequately manage those risks.

To assist in carrying out its responsibilities, during the reporting period, the Crown Board had the following standing committees, with special purpose committees established from time to time:

- Audit and Corporate Governance Committee
- Corporate Responsibility Committee
- People, Remuneration and Nomination Committee
- Occupational Health and Safety Committee
- Responsible Gaming Committee
- Risk Management Committee

### **Modern Slavery Program of Work**

Following the enactment of the *Modern Slavery Act 2018* (Cth), Crown commenced a program of work to consider the modern slavery risks processes and to prepare for reporting under the Act.

A working group comprised of representatives from Legal, Procurement, Risk and Sustainability was formed to oversee the modern slavery program of work. During the reporting period, this work was overseen by Crown's Corporate Responsibility Committee, with updates provided to the Crown Board from time to time.

For the financial year ended 30 June 2020, Crown also engaged an external specialist human rights and social impact adviser to support its modern slavery program of work.

To raise awareness within Crown, representatives from the modern slavery working group presented on the topic to the Business Operations Teams at Crown Melbourne and Crown Perth which comprise of senior managers across the business.



## **Policies**

### **Code of Conduct**

Crown's Code of Conduct sets the standard required of everyone who works for Crown and its Australian resorts, including directors and employees.

During the reporting period, the Crown Board adopted a revised Code of Conduct that incorporates a standard of conduct on human rights that recognises the importance of human rights of all stakeholders and ensures that Crown's operations do not contribute to modern slavery practices. The revised Code of Conduct was effective from 1 July 2020.

Individuals covered by the Code of Conduct are expected to create and maintain a work environment that respects human rights and is free from unlawful discrimination and harassment.



#### **More information**

A copy of Crown's Code of Conduct is available at: <https://www.crownresorts.com.au/Corporate-Governance/Codes>

### **Supplier Code of Conduct**

In 2018, Crown introduced a Supplier Code of Conduct which highlights Crown's key values and operating principles, including human rights and workplace conditions, and outlines supplier expectations.

The Code expects Crown's suppliers to align with Crown's values and provides Crown with the right to periodically assess supplier practices that relate to the Code of Conduct.

During the reporting period, the Supplier Code of Conduct was updated to strengthen its alignment with the Act and to refer to Crown's Whistleblower Policy which applies to suppliers and their employees.



#### **More information**

A copy of Crown's Supplier Code of Conduct is available at: <https://www.crownresorts.com.au/Corporate-Governance/Codes>

### **Human Rights Policy**

During the reporting period, Crown undertook a review, with the support of independent human rights subject matter experts, to understand its salient human rights issues. Through this review, Crown identified four human rights issues where Crown believes it can mitigate risks, prevent harm or support

better outcomes for its stakeholders. Recognising Crown's responsibility to respect all human rights, the particular areas identified are: labour rights, health and safety, equality and discrimination and Indigenous rights.

Following the reporting period, the Crown Board adopted a Human Rights Policy through which Crown has committed to understanding and acting on the impact on people of our business activities and supply chain. In respect of modern slavery, Crown has committed to identifying and addressing the risk of modern slavery practices in our direct supply chain.



#### **More information**

A copy of Crown's Human Rights Policy is available at: <https://www.crownresorts.com.au/Corporate-Governance/Policies>

### **Whistleblower Policy**

Crown has a Whistleblower Policy which provides a mechanism for individuals covered by the Policy, including employees and suppliers, to report misconduct and wrongdoing without fear of detriment.

Under the Policy, disclosures may be made anonymously or on a confidential basis. To facilitate this, Crown utilises an independent and confidential hotline which is available 24 hours a day, seven days a week.



#### **More information**

A copy of Crown's Whistleblower Policy is available at: <https://www.crownresorts.com.au/Corporate-Governance/Policies>

### **Supply Chain Management**

#### **Sustainable Supply Chain**

In Australia, Crown, through its procurement activities, places significant importance on driving local and Indigenous supplier relationships, and working with organisations that support the employment of people with disability and who promote Gender Equity.

The management of environmental, social and economic impacts and the encouragement of good governance practices is a key Sustainable Supply Chain objective for Crown. Crown remains focussed on continuing to develop internal processes and implement recommendations in line with best practice ISO 20400 Sustainable Procurement.

Crown is also committed to working with its suppliers to raise awareness of modern slavery risks.

In 2018, Crown launched its Sustainable Supply Chain Policy. This Policy was developed to provide guidance towards integrating environmental and social considerations in procurement decisions to promote a more sustainable way of doing business. Crown's vision is to contribute to environmental sustainability and community development whilst reducing the impact of Crown's operations through considered procurement decisions.

### ***Supplier Qualification Process***

Over the past years, Crown has implemented a supplier onboarding questionnaire for its Australian operations, which captures the vast majority of Crown's suppliers and provides Crown with transparency and insight about the sustainability of its suppliers, including health and safety, human rights and environmental impacts. Suppliers are required to complete a detailed questionnaire as part of Crown's supplier pre-qualification and risk assessment processes. During the reporting period, the onboarding questionnaire was strengthened to include specific modern slavery questions. Following the conclusion of the reporting period, prospective and new suppliers are required to complete the modern slavery questions.

The onboarding process also includes an assessment for sanctions and enforcements, watchlists, adverse media and politically exposed persons. Active suppliers are continually monitored against these risk factors.

Crown does not currently audit suppliers in relation to modern slavery risks but will consider additional assurance measures as we mature in our supply chain due diligence approach.

### ***Supplier Data Analytics Tool***

During the reporting period, Crown, in conjunction with an external specialist human rights and impact adviser, developed a supplier modern slavery risk assessment data analytics tool. The data analytics tool will be used by Crown in future reporting periods to identify high risk onboarded suppliers based on the following four risk factors:

- Country/region
- Category/sector
- Risk business models
- Vulnerable populations

Based on the supplier data Crown has obtained as at the end of the reporting period, the tool can consider the country/region and category/sector risk factors. As Crown sources additional data from suppliers in respect of modern slavery, the tool will enable Crown to make an assessment across the four risk categories.

### ***Supplier Forums***

Crown holds supplier forums twice yearly for our key operational suppliers (high business impact or value). Following the introduction of the Act, a number of these forums were used by Crown to raise awareness of modern slavery amongst these key suppliers.

### ***Supplier Relationship Management***

Since 2018, Crown holds supplier relationship management meetings on either a quarterly or biannual basis with approximately 20 of its service providers, including cleaning service providers. Those suppliers are required to complete a scorecard which includes criteria on compliance with labour laws and subcontracting arrangements.

### ***Supplier Contracts and Purchase Order Terms and Conditions***

During the reporting period, Crown developed a modern slavery clause for inclusion in its supply contracts and purchase order terms and conditions which requires compliance with the Act and notification of any identified instances of modern slavery in its operations and supply chain.

### ***Procurement Documents***

During the reporting period, Crown updated its procurement policies and guidelines and requests for proposals/tender to include modern slavery considerations.

### ***Assessing the Effectiveness of Actions***

Crown acknowledges that, in the first reporting period, it was in the early stages of understanding its exposure to potential modern slavery risks and to raise awareness of modern slavery.

Following the commencement of the Act, Crown engaged an external specialist human rights and impact adviser to undertake a modern slavery readiness assessment to determine the maturity of Crown's approach to managing operational and supply chain modern slavery risks, informed by and aligned with the UN Guiding Principles on Business and Human Rights and other relevant international frameworks. A roadmap was then developed to enhance Crown's maturity.

Crown's Risk Management Committee monitors disclosures made under Crown's Whistleblower Policy. No instances of modern slavery were identified through this service during the reporting period. We recognise that this does not mean that no instances of modern slavery existed in our operations or supply chain and will consider ways to strengthen the effectiveness of reporting instances, or suspected instances, of modern slavery.

Crown expects that as we mature in our approach and understanding of modern slavery, our processes will continue to evolve and our ability to assess the effectiveness of our actions will be enhanced.

### **Consultation**

As described above, having regard to the scale of the operations of Crown's Australian resorts in the context of the Crown Group, Crown's program of work in the first reporting period focussed on these business operations.

Crown consulted with its operational owned and controlled entities regarding the application of the Act to Crown, the mandatory reporting requirements under the Act and Crown's program of work with respect of modern slavery risks. In addition, during the reporting period, the Boards of Crown's operational owned and controlled entities comprised at least one Crown director.

Crown will continue to consult with these entities and will progressively enhance the risk assessments across these entities over future reporting periods.

Crown Aspinalls in London publishes a standalone Modern Slavery Statement under the *Modern Slavery Act 2015* (UK).

### **Other Information**

In future reporting periods, Crown will engage with its strategic suppliers and its suppliers identified as high risk from a modern slavery perspective to build enhanced visibility of our extended supply chain and to implement appropriate remediation processes. This process will then be refined as required and progressively rolled out based on risk and criticality of suppliers.

Crown will also focus on raising awareness of modern slavery and build capability amongst its employees.

Crown will continue to participate in collaborative forums on modern slavery to build knowledge and capability and to assist in strengthening its modern slavery identification and remediation practices.

