



Crown Resorts Limited

Code of Conduct

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

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Message from our Chairman

As one of Australia's largest entertainment groups, Crown makes a major contribution to the Australian economy through its role in tourism, employment and training, and its corporate responsibility programs.

Crown operates in one of the most highly regulated and supervised industries and our actions can impact our operations and the communities within which we operate.

This Code of Conduct sets the standards of professional behaviours that are expected of all our employees in carrying out their work and ensuring that *together we create memorable experiences*.

At Crown, we are committed to delivering our services lawfully, ethically and responsibly. It is imperative for our employees to do the right thing and to act in accordance with our legal and regulatory framework.

I encourage you to take the time to read and understand your responsibilities and rights as a Crown employee.

Yours sincerely,

Helen Coonan
Executive Chairman

OUR PURPOSE AND VALUES

Together we create memorable experiences



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.

1. Background

1.1. Purpose

This Code of Conduct (**Code**) sets the standards required of all of us at Crown Resorts Limited and each of Crown’s Australian Resorts and their subsidiaries (**Crown**).

It is imperative that our services are carried out lawfully, ethically, honestly and responsibly and with the highest standards of integrity and professionalism.

1.2. Application of this Code

This Code applies to everyone who works for Crown, including directors, officers, employees, contractors, consultants, agents and third parties who work for, or with, Crown.

Crown’s joint venture partners are encouraged to adopt standards of conduct relevant to that joint venture that are consistent with this Code.

1.3. Living our Values through our Behaviours

Our values are our shared beliefs about what we stand for and how we operate.

At Crown, we believe that *together* we create memorable experiences. Our values are:

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Together we create memorable experiences



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.

You are expected to act in accordance with these values in carrying out your duties and to act in the best interests of Crown.

1.4. Breaches of this Code

You are responsible for understanding and complying with this Code. Breaches of this Code can have ramifications for you and Crown.

A breach of this Code by you may be regarded as misconduct and may lead to disciplinary action up to and including termination of employment or engagement, as applicable.

You are required to read this Code and understand the behaviours expected of you at Crown. Breaches of this Code will not be excused by alleged ignorance of the requirements set out in this Code.

1.5. What if I am unsure?

If you are unsure of any aspect of this Code, you should discuss the issues with your immediate supervisor or human resources manager.

2. Standards of Conduct

2.1. Anti-Money Laundering (AML)

Crown is committed to complying with its obligations under applicable anti-money laundering and counter-terrorism financing (**AML/CTF**) laws and regulations. Each of Crown's operating Australian Resorts has adopted a Joint AML/CTF Program to mitigate and manage the risk that Crown may be used to facilitate, intentionally or unintentionally, the laundering of criminal proceeds.

A breach of AML/CTF laws and regulations can have severe regulatory, financial and reputational consequences for Crown and its employees. You must be aware of and comply with those requirements. All new employees are required to undertake AML/CTF risk awareness training upon commencement of employment, and all existing employees are required to undertake ongoing training at regular intervals.

Each of Crown's operating Australian Resorts maintains a system to manage any employee who fails to comply with any system, control, policy or procedure established in accordance with the Joint AML/CTF Program.

For more information, refer to the Compliance with the AML/CTF Act and Rules Policy which can be found on the Crown intranet.

2.2. Appropriate Workplace Behaviour

At Crown, we are committed to working with integrity and in accordance with the law. You must act respectfully, be passionate about what you do, work together and do the right thing.

All business affairs must be conducted legally, ethically, honestly, responsibly and with the highest standards of integrity and professionalism.

You must not use your position at Crown or the opportunities arising from your position to gain an advantage for yourself or someone else.

For more information, refer to the workplace behaviour policy which can be found on the Crown intranet.

2.3. Bribery and Corruption

Crown is committed to operating with the highest levels of corporate integrity and preventing bribery and corruption in all forms, wherever and with whomever Crown conducts business.

Crown takes a zero-tolerance approach to acts of bribery and corruption.

You are prohibited from engaging in any form of bribery and corruption and must comply with all applicable laws.

For more information, please refer to Crown's Anti-bribery & Corruption Policy, which can be found on the Crown website and on the relevant Crown intranet page.

2.4. Community Interests

Crown seeks to maintain good relationships with the communities in which it operates. Crown is dedicated to delivering quality service and products and partnering with various community organisations to improve the community of which we are a part.

You are encouraged to support these initiatives.

2.5. Company Resources and Technology

You must maintain and protect Crown's data, technology and property and use it only for legitimate business purposes as required by your role and for the sole benefit of Crown. Occasional personal use of Crown's email, internet and telephone system is permitted provided it does not interfere with your work duties or Crown's information systems.

The use of Crown's technology systems and data will be monitored.

You must access and handle Crown data and information in an appropriate and secure manner. You must not share user accounts or account passwords.

For more information, refer to the IT Security Policy, which is available on the intranet.

2.6. Confidential Information and Business Records

Crown is committed to protecting the confidential information and records it holds.

In carrying out your duties to Crown, you may obtain information which must be treated confidentially. Any unauthorised use or disclosure of information or data relating to Crown, including customer and employee details, may adversely affect Crown's reputation, legal obligations and your employment or engagement at Crown. You must not disclose or use any confidential information during or after your employment except in the proper course of your duties.

You must not use information obtained in your capacity as a Crown employee improperly to gain an advantage for yourself or someone else or to cause detriment to Crown or its customers.

You must not destroy or alter, in an unauthorised manner, Crown documents and records in any form, or falsify or tamper with any records, including any records that are provided by an external party for business purposes.

For more information, refer to the Records Management Policy and Document Retention Guide, which is available on the intranet.

2.7. Conflicts of Interest

A conflict of interest exists where interests are divided, or could be perceived to be divided, between two or more parties.

You are required to guard against any possible or perceived conflict of interest in carrying out your duties. The following situations must be avoided:

- making, influencing or participating in Crown business decisions that provide a personal benefit to you or benefit to your friends, family or associates; and

- involvement in any business activity or decision with relevance to Crown that is fraudulent or corrupt or may be inconsistent with Crown’s activities.

You should immediately inform your supervisor or human resources manager of any possible or perceived conflict of interest.

For further information, please refer to the Conflicts of Interest Policy, which is available on the intranet and the Anti-bribery and Corruption Policy, which is available on the Crown website.

2.8. Customer Service

To further Crown’s purpose of *together we create memorable experiences*, you must deliver quality customer service to Crown’s customers by conducting yourself with integrity and doing the right thing in a manner that ensures that our products and services are delivered at the highest possible standards.

2.9. Dealing with Suppliers

Crown is committed to ensuring it deals with suppliers fairly and with those who operate ethically and to source and use ethical and sustainable products and vendors.

For further information, please refer to Crown’s Code of Conduct for Suppliers, which is available on the Crown website.

2.10. Diversity & Inclusion

Crown is committed to fostering a diverse and inclusive workforce and community and to providing equal opportunity. Crown is committed to ensuring that all employees are given the opportunity to make the most of their talents and abilities.

Crown does not tolerate behaviour which could be perceived as discrimination, harassment, bullying or victimisation based on gender or gender identity, race, colour, religious belief/activity, age, marital/relationship status, disability/ impairment, pregnancy, breastfeeding, status as a parent, status as a carer, sexual orientation (including LGBTQIA+), political belief/activity, industrial activity, physical features, or any other unlawful grounds.

For further information, please refer to the Diversity Policy which is available on the Crown website.

2.11. Employee Benefits

Crown provides its employees with various benefits and privileges at its properties. You are expected to use these benefits and privileges responsibly.

2.12. Environment

Crown is committed to making meaningful contributions toward reducing our environmental impact by pursuing sustainable energy, water, procurement and waste practices in all of our operations.

You are encouraged to promote a culture of sustainability and conservation in all areas of our business.

For more information, please refer to Crown’s Environmental Policy which is available on Crown’s website.

2.13. Gifts, Tips and Gratuities

Different policies apply for the receipt of gifts, tips and gratuities depending on whether an employee is licensed by a relevant state gaming regulator or not.

Generally, licensed employees are not permitted to receive a gift, tip, gratuity or benefit from a customer other than in accordance with relevant property-based policies.

Non-licensed employees may only accept tips from customers in accordance with the relevant policies and procedures. Receipt of a gift, tip or gratuity with a value of AUD\$200 or greater must be reported to the Compliance Department, via your supervisor or human resources manager.

For more information, please refer to the Gifts, Tips and Gratuities Policy, which is available on the intranet.

2.14. Health, Safety and Wellbeing

Crown is committed to protecting the health, safety and wellbeing of the people who work with us and the people who visit and use our facilities.

You are expected to familiarise yourself with and understand the CrownSAFE procedures relevant to your area of work. These procedures can be found on the intranet and provide you with guidance as to how to perform your job safely and reduce the health and safety risks to you and others.

For more information, please refer to the Occupational Health & Safety Policy on Crown's website and the Health, Safety and Wellbeing Policy, which is available on the intranet.

2.15. Human Rights

Crown recognises the importance of respecting the human rights of all stakeholders and ensuring that our operations do not contribute to modern slavery practices.

Crown expects that you create and maintain a work environment that respects human rights and is free from unlawful discrimination and harassment.

2.16. Insider Trading

You must comply with relevant insider trading laws and not trade in Crown securities while in possession of inside information. Any trading in Crown securities must be conducted in accordance with Crown's Securities Trading Policy, which can be found on the Crown website.

2.17. Intoxication

Crown does not condone the use of substances that may impair your ability to carry out your duties at Crown.

In order to ensure a safe and enjoyable working environment, you are prohibited from using illicit substances during work and you must not work at any time when your ability to function at work is impaired.

2.18. Licensed Employees – Conditions

Crown employees who are licensed by a relevant state gaming regulator must maintain and uphold the provisions and conditions of their licence.

You are required to notify the relevant state gaming regulator of any material changes in your circumstances (including a change to your name, home address and contact details) within 14 days of the change. In relation to the requirement to be a fit and proper person to hold your licence, you must also notify the relevant state gaming regulator of any criminality, bankruptcy and other relevant matters. If you hold a licence in more than one jurisdiction, notification must be made to each state gaming regulator in those jurisdictions.

Any enquiries relating to your licence should be directed to the Compliance Department.

2.19. Media Comment

Crown is committed to maintaining a professional image by ensuring that any commentary to the media is truthful, honest and consistent.

The Chair of the Crown Resorts Limited Board, the Chief Executive Officer, the Chief Financial Officer, the Manager – Strategy and Investor Relations, those with direct responsibility for media contact and those that have been authorised by the Chief Executive Officer are the only people authorised to speak to the media, analysts or investors about Crown.

Accordingly, you must not make any comment (for example on social media or to the media, analysts or investors) regarding any activity or event associated with Crown, its employees or customers unless you fall within one of the categories of people identified in the above paragraph. If you are contacted by the media, you must refer that approach to your supervisor or human resources manager, who can then refer it to the appropriate person.

2.20. Political Donations

Crown and its associated entities have ceased making monetary or in-kind political donations.

Crown, including directors and their spouses, must not make donations to New South Wales political parties.

Crown recognises your rights to participate as individuals on your own account in the political process.

2.21. Privacy

Crown collects, manages and uses personal information in accordance with its privacy policies.

Crown is dedicated to protecting personal information and complying with relevant privacy laws across all areas of its business. You are required to protect personal information and to comply with relevant privacy laws.

Actual or suspected breaches of relevant privacy laws or Crown's privacy policies should be reported to Crown's Privacy Manager as soon as reasonably practicable.

For more information, please refer to the Privacy Compliance Guide, which is available on the intranet.

2.22. Responsible Gaming

Crown is committed to minimising harm by providing gaming services in a responsible manner and to complying with relevant laws and industry standards to ensure gaming services are delivered responsibly. Crown recognises that some customers may experience difficulties associated with their gaming behaviours and provides services and programs for both customers and employees to support them.

You are required to undertake Responsible Gaming training and comply with Crown's Responsible Gaming Code of Conduct and other policies and procedures regarding the responsible service of gaming.

For further information, refer to the Responsible Service of Gaming Policy, which is available on the intranet.

2.23. Responsible Service of Alcohol

Crown is committed to complying with its legal and social obligations in the responsible service of alcohol. You must ensure that you comply with all laws, Crown's licensing requirements and Crown's policies regarding the responsible service of alcohol.

For further information, refer to the RSA Policy Statement, which is available on the intranet.

3. Reporting Breaches of this Code

If you believe that another person within Crown is not complying with this Code, you are encouraged to raise this with your immediate supervisor or human resources manager in the first instance. If you are uncomfortable with this or are not satisfied with their response, you can report a breach to STOPLine, Crown's independent and confidential service, or otherwise in accordance with Crown's Whistleblower Policy.

4. Review of Code

Crown will review this Code as required from time to time to ensure it continues to be appropriate for Crown and to ensure that it is operating effectively.

Crown may also undertake internal or external audit reviews from time to time to obtain assurance regarding compliance with relevant laws and regulatory requirements.

Crown Resorts Limited

April 2021