

CODE OF CONDUCT 2025





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.



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MESSAGE FROM CHAIRMAN AND CEO



As Australia's largest integrated resort and a significant economic contributor in the nation's vibrant tourism industry, it is imperative Crown Resorts aligns to strong ethics, bound by clear guidelines to inform our behaviours.

We hold significant responsibility, contributing billions annually to Australia's economy, employing the largest hospitality workforce, and supporting vital community causes including homelessness, domestic violence, and disaster relief.

Upholding our compliance and regulatory obligations is critical in our operating environment and as a collective we continue to demonstrate this by building trust with our guests, team, communities and stakeholders.

We're leading the way in gambling reform for our industry, acting with integrity to showcase a strong investment in safer practices. With each guest that comes through our doors, there is a new opportunity to promote our commitment to being a responsible gaming and entertainment destination.

Please remember, when you take on board this Code, you are delivering on the mission to embody our Values and act with care in the communities in which we operate.

Together, we can ensure the future success of our business and continue to meaningfully contribute to Australia's tourism and events landscape.

Yours Sincerely,

John Borghetti
Chairman,
Crown Resorts Limited

At Crown Resorts, our Code of Conduct informs what we stand for and how we behave at work. It reflects our Purpose and Values and is critical to building trust with our team, guests, communities, and stakeholders.

In recent years, we have fundamentally transformed our business and demonstrated our commitment to operating with integrity through major regulatory reforms, positioning us as the safest place for gaming in the world.

We have also focused on creating an environment where our team feels empowered to be their best and speak up if something doesn't feel right. We have developed our internal processes and policies to support ethical decision-making and create an inclusive and respectful workplace for everyone.

As we continue to grow our business and further refine our guest offering, it's important we all maintain accountability and integrity in everything we do. This will help us build the trust that is critical to our success and help us be the ultimate entertainment destination in each of our cities.

Our Executive Committee and Boards are committed to upholding our Code of Conduct, and we thank you all for your support and ongoing contribution to the success of Crown.

Yours sincerely,

David Tsai
Chief Executive Officer
Crown Resorts

PURPOSE OF THE CODE

Our Code of Conduct sets out the expectations for how we conduct ourselves and support each other to delight our guests and support our communities lawfully, compliantly, and ethically.

It connects our Purpose and Values to key policies to explain what Crown stands for, with the 'Can We? Should We?' test designed to support you when faced with a challenging decision and information on how to raise your concerns.

The Code applies to all Crown team members, contractors, and Board directors.

As Team Members of Crown, we are expected to:

- Read the code.
- Complete the Code of Conduct mandatory eLearn module.
- Behave ethically and in accordance with the law when you do business at Crown.
- Raise concerns, listen to the views of others and act if you know or suspect something doesn't meet the requirements of this Code.
- Use the 'Can we? Should we?' test to guide decisions.
- Speak with your People Leader or a team member from Risk and Compliance, Financial Crime, People and Culture or Crown PlaySafe, if you don't understand something in the Code.
- If you are a People Leader, apply, role model and reinforce the Code and foster a culture where our team members feel safe to raise concerns.
- Support and encourage each other to speak up to make things better.

You can expect:

- Everyone to be held accountable and to the same standards set by our Code – team members, leaders, Board directors, and contractors.
- Support when you speak up.
- Guidance on making decisions compliantly and ethically.

→ Following the Code is mandatory

- Following the Code helps guide us on our journey to becoming a beacon of excellence for integrated resorts.
- Not following it can have serious consequences for guests, communities, team members and for Crown.
- If you don't follow the Code, you may face consequences, which can range from coaching and counseling to learn from mistakes to additional training. In cases of serious breaches of the Code, termination of employment may occur.

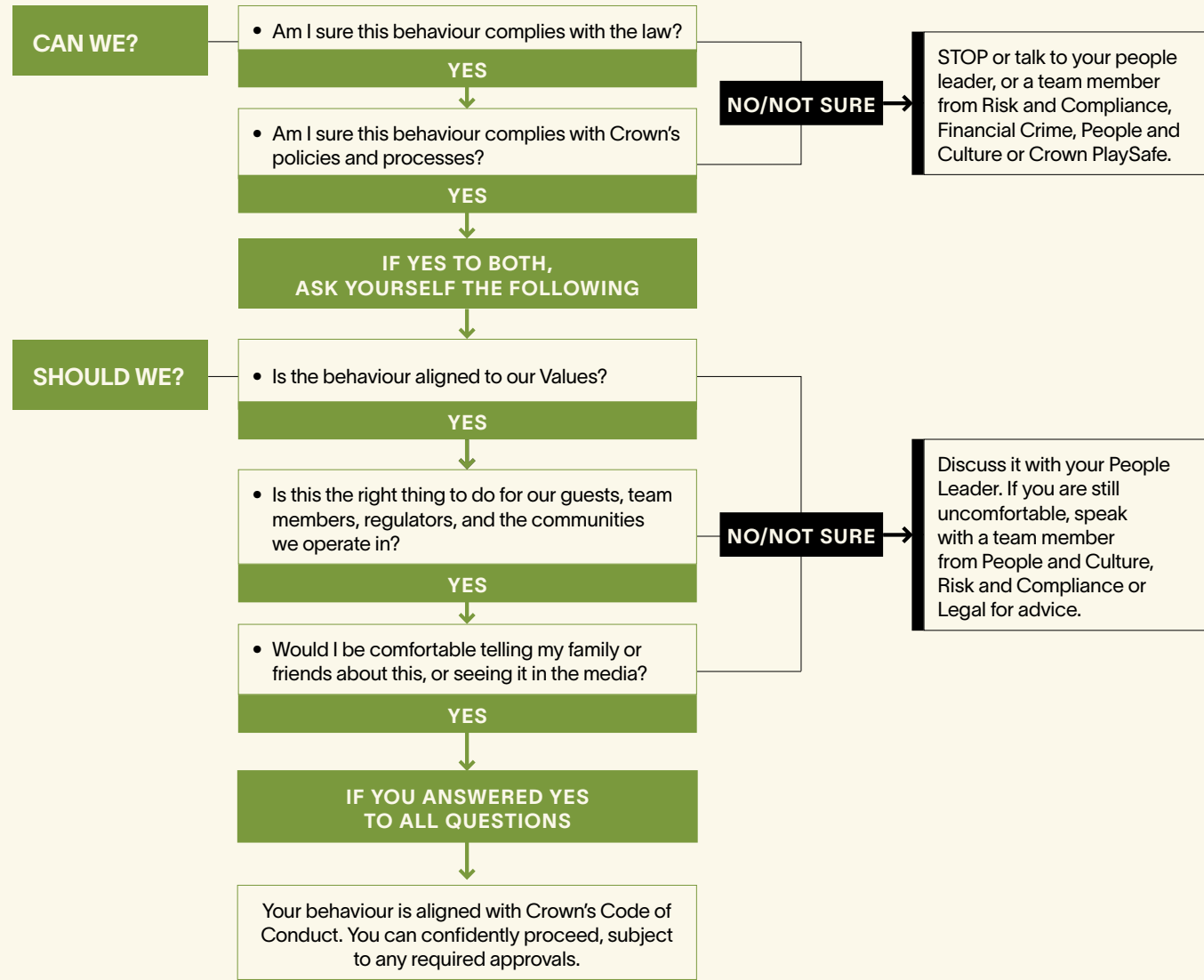
HOW TO USE THE CODE

At Crown we always aim to do the right thing with a positive attitude, ensuring responsible practices to continue to instil trust in our team members, guests, and communities which we serve and take pride in being part of. Each of us is responsible for following the Code and to act if something doesn't align with our Values.

Crown's Purpose, Values and Critical Behaviours describe how we are expected to conduct ourselves as team members at Crown. Additionally, our policies and guidelines instruct us on meeting our regulatory and legal obligations.

However, we understand there isn't always a rule to follow, making it unclear what the right course of action is. That's why we have the 'Can We? Should We?' test. The test is designed to help you work through decisions when the right action it isn't immediately clear.

Can we? Should we? test



SPEAKING UP

At Crown, we encourage everyone to Speak Up about behaviour that isn't in line with our Values or Code of Conduct, or when we are concerned about an issue and not sure the best course of action.

We understand the importance of providing a safe and supportive environment for raising concerns. We have a zero-tolerance towards retaliation against anyone who speaks up with a concern or participates in any investigation into a possible violation of the law and this Code or Crown Policies. By Speaking Up, we are identifying potential problems and risks to make things better.

Every concern matters. There are several ways you can speak up when something doesn't feel right. These include:

- Having a conversation with your People Leader or another Leader.
- Reaching out to a member of Crown's People and Culture team.
- Raising a potential or actual risk or incident with the Risk and Compliance, Financial Crime or Crown PlaySafe teams.
- Notifying Security if you observe unacceptable behaviour by a guest or a team member.
- Making reports of serious misconduct and wrongdoing to Core Integrity.

Core Integrity
Crown's independent and confidential Speak Up service

When you are not comfortable raising your concerns via any of our internal support channels or the concern is about serious misconduct, wrongdoing or illegal activity, you can contact Core Integrity, Crown's independent and confidential Speak Up service. Core Integrity is an external service that is available 24/7. The Core Integrity Speak Up service is designed to complement, and not replace, our existing internal channels for Speaking Up.

You can contact Core Integrity 24/7 via:

- Submitting a report online.
- Phone: 1800 305 796
- Email: crownspeakup@coreintegrity.com.au

→ About Whistleblower

Not every concern is a whistleblower matter. The Crown Resorts Whistleblower Policy details what constitutes a whistleblower concern and the protections and support available to whistleblowers.

Key policies & more information

- Crown Resorts Limited Whistleblower Policy and Procedures
- Crown Resorts Limited Workplace Behaviour Policy
- Crown Resorts Limited Consequence Management Guidelines



CROWN’S PURPOSE, VALUES AND CRITICAL BEHAVIOURS

Our Purpose, ‘Together, we create joyful, elevated experiences’, is our ‘why’ and the promise we make to the communities we serve and our guests. Our Values are at the core of all our decisions. They are our ‘how’ and come to life in our behaviours.

Together our Purpose and Values unite us as one team, irrespective of where we are based or our role here at Crown, guiding us on our journey to becoming a beacon of excellence in integrated resorts.

Embedded within our Code is the expectation that you will live our Values and behaviours every day, actively contributing to our Purpose.

OUR VALUES AND CRITICAL BEHAVIOURS

WE ACT WITH INTEGRITY



BE HONEST AND TRANSPARENT

- We follow the spirit of our rules, code of conduct, and the laws and regulations that govern us.
- We act ethically and responsibly, take accountability for our actions, and admit our mistakes and shortcomings.

SPEAK UP

- We trust and empower people closest to the decision to make the decision.
- We speak up when we have concerns or have something to contribute. We listen and support others to speak up.

WE WORK TOGETHER




COLLABORATE WITH EACH OTHER

- We work with different people and teams, in pursuit of our common goals.
- We share our knowledge and lessons learnt from our successes and mistakes.

WELCOME DIVERSITY AND INCLUSION

- We welcome and respect people of different race, age, gender, sexual orientation, religion, skills, experience and abilities.
- We seek out different perspectives to inform our decisions and make other people feel heard, valued and understood.

WE CARE



CONCERN FOR SAFETY AND WELLBEING

- We look out for team member physical and mental health, safety and wellbeing.
- We choose what is right to look after and support our communities.

NURTURE AUTHENTIC RELATIONSHIPS

- We respect, support and empathise with our guests, team members and communities by seeing them as people first. We bring out the best in others by giving honest and constructive feedback.

WE STRIVE FOR EXCELLENCE



SHOW PASSION WHEN CREATING EXCEPTIONAL EXPERIENCES

- We pursue opportunities for innovation, growth and creativity to exceed expectations.
- We assume there is always a solution and don't give up until we find it.

RECOGNISE AND CELEBRATE EXCELLENCE

- We appreciate, recognise and celebrate excellent performance and character.
- We look outward to continuously improve.



ALIGNMENT OF OUR VALUES AND OUR CODE OF CONDUCT

WE ACT WITH INTEGRITY



Acting with integrity means acting responsibly, taking accountability for our actions, and making decisions that consider the risks to our business and communities to ensure Crown can continue to build enduring trust.

- **We protect our community and the integrity of our business** and strive to ensure our gaming operations are free from criminal influence, through meeting our anti-bribery and corruption, anti-money laundering and counter-terrorism financing obligations and managing fraud.
- **We respect and safeguard the assets of Crown** and use them responsibly and for legitimate business purposes only.
- **We properly manage the intellectual property rights** of Crown and respect the intellectual property rights of others.
- **We care about privacy and confidentiality** by keeping information secure and protecting the personal information of our guests and team members from unauthorised access and disclosure.
- **We establish strong and ethical business relationships** with others and never make, receive, or enable others to make or receive improper payments, benefits, or gains.
- **We make sure our personal interests** including relationships and our business alternate employment, financial and other interests don't conflict with, or have the potential to conflict with, our work duties or Crown's best interests. We excuse ourselves from any decision making that may be, or perceived by others to be, a conflict of interest.
- **We take steps to avoid any association with individuals or groups** who are known to be, or reasonably suspected of being, involved in unlawful or improper activities given that such associations may reflect adversely on Crown's reputation in the community, and our own reputations.
- **We don't take advantage of our position or the opportunities arising from them**, including by using Crown information for personal gain, by causing detriment to Crown or its guests, or by passing such information to others.

- **We exercise caution when offering or accepting gifts, tips, gratuities, or hospitality** to ensure they do not and it is not perceived to improperly influence a business outcome. We never accept gifts, tips, gratuities or hospitality from our gaming patrons or their associates as this is in breach of our regulatory and licensing obligations.
- **We know and meet our team member conditions** including under any specific team member licences we hold and all laws applicable to Crown.
- **We do not act in a manner which could be seen as Crown interfering with political processes** and ensure that the public's trust in Crown is not compromised by undue perceptions of political influence. Crown and its subsidiaries do not make monetary or in-kind political donations. We also ensure that any political donations we make in our personal capacity comply with any applicable laws.
- We do not speak on behalf of Crown and or release information externally unless we are authorised to do so. **We care about the reputation of Crown's 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.
- **We ensure that any social media content we're accountable for**, including post on private accounts, follow Crown's policies and procedures.

What this means for you

- Always act in the best interests of Crown and be honest in your dealings with others, including your People Leader, colleagues and our guests.
- Look out for and report any actual or suspected activities.
- Never offer or accept any bribes, pay-offs, facilitation payments; secret, unjustified or inflated commissions; kickbacks, or any like payments or improper benefits. Report any instances of suspected or actual instances of bribery or corruption. You will be protected from any retaliation where you do so in good faith.
- Never offer or receive gifts, tips, gratuities or hospitality from our gaming patrons or their associates in breach of our regulatory and licensing obligations. All other gifts, tips, gratuities or hospitality must not be excessive or inappropriate and must be reported, disclosed and/or approved in accordance with policy.
- Do everything you can to avoid actual and perceived conflicts of interest. If they arise, disclose them to your People Leader, member of the Compliance or People and Culture team or through one of our other speak up channels and ensure appropriate steps are taken to manage them.
- Immediately disclose to your People Leader, member of the Compliance or People and Culture team or through one of our other speak up channels any current associations with a group or an individual that is engaged in unlawful or improper activities.
- Ensure Crown's intellectual property and confidential information is managed in accordance with our policy and procedures. This includes protecting it and not disclosing, using, disposing or profiting from it without authorisation, even after your employment or engagement with Crown comes to an end.
- Always treat the personal and confidential information of others with respect. Any personal information we collect, use, store and disclose must be managed in accordance with our policies, procedures, and the law.
- Use Crown property and resources for their intended purposes and not for personal gain. Ensure any business expenses you incur on behalf of Crown are for legitimate business-related purposes and don't knowingly damage or misappropriate Crown assets or allow others to.

- Don't offer or promise to offer funds for a charity or community cause with the intention to inappropriately influence anyone. Always check the credentials of the charity organisation before you engage in any dealings with them.
- Crown does not make Political Donations (whether monetary or in-kind). As a Team Member you must ensure if you make a Political Donation in a personal capacity, it does not look like it was made on behalf of Crown or to advance the interests of Crown.
- Ensure you understand who is authorised to make public statements. If you are unsure, speak with your People Leader or refer inquiries, including from the media to a Corporate Affairs representative.
- Report any content published by others on social media in relation to Crown that you think is misleading, deceptive, inappropriate or wrong.

Key policies & more information

- Crown Designated Business Group Joint Anti – Money Laundering and Counter-Terrorism Financing Program Part A
- Crown Resorts Limited – Anti-Bribery and Corruption Policy
- Crown Resorts Limited – Board Governance Policy
- Crown Resorts Limited – Conflict of Interest Policy
- Crown Resorts Limited – Team Member Conditions Policy
- Crown Resorts Limited – Political Donations Policy
- Crown Resorts Limited – IT Asset Management Policy
- Crown Resorts Limited – IT Data Management Policy
- Crown Resorts Limited – Privacy Policy
- Crown Resorts Limited – Records Management Policy
- Crown Resorts Limited – Gifts, Tips and Gratuities
- Crown Resorts Limited – Corporate Communications and Social Media Policy
- Crown Resorts Limited – Employee Licensing and Gambling by Employees Policy
- Crown Resorts Limited – Spend Policy

WE WORK
TOGETHER



We promote and maintain a respectful way of working with our team members, guests and suppliers and are committed to conducting business with the highest standards of integrity and professionalism.

- **We promote diversity and inclusion**, consider individuals, and recognise their values.
- **We maintain a safe, inclusive and respectful working environment** and ensure our suppliers and business partners understand that we have the same expectations of them.
- **We ensure our workplace behaviour is conducted** legally, ethically, honestly, responsibly and with the highest standards of integrity and professionalism.
- **We have zero tolerance for** bullying, harassment, sexual harassment, discrimination or racism.
- **We set standards of behaviour** in accordance with the Equal Employment Opportunity (EEO) law and do not tolerate anti-social, illegal, or inconsistent standards of behaviour by Crown team members, guests and suppliers.
- **We work constructively with regulators**, law enforcement agencies and other bodies and ensure we are open and transparent as we do so.
- **We do not accept behaviour that creates a risk** to health and safety (including physical or mental health) or causes another person to feel unsafe.

What this means for you

- Demonstrate fairness and respect in all your dealings. Everyone has a part to play in actively and intentionally behaving with inclusion in mind. Be collaborative and supportive towards each other.
- People Leaders are responsible for demonstrating leadership by addressing inappropriate behaviour when they see or hear it.
- Don't engage in unacceptable actions or behaviours that involve harassment, discrimination or bullying. If you experience such inappropriate behaviour, you are encouraged to discuss it with your People Leader, People and Culture manager or Compliance manager, or report it through another channel.
- Report any engagement with inspectors or regulatory authorities to your People Leader, Compliance or Regulatory Relationship Manager.
- If you become aware of unacceptable behaviour by a guest or a team member, you should notify a security staff member immediately. In the case of a team member behaving inappropriately their People Leader should also be notified.
- Make sure that our suppliers and third-party business partners understand that we have the same expectations of them to maintain a safe, inclusive, and respectful working environment.

Key policies & more information

- Crown Resorts Limited – Workplace Behaviour Policy
- Crown Resorts Limited – Supplier Code of Conduct
- Crown Resorts Limited – Regulator and Law Enforcement Agency Engagement Policy
- Crown Resorts Limited – Diversity, Equity & Inclusion Policy
- Crown Resorts Limited – Health, Safety and Wellbeing

WE CARE



Core to our Values is fostering strong and inclusive relationships built on respect. We care deeply about doing the right thing for our guests, team members, governments, regulators, communities we operate in and the environment. We are committed to the wellbeing of our guests and preventing gambling harm through our Crown PlaySafe program.

- **We care about delivering a safe and responsible gaming environment for our guests**, through meeting our legal and social obligations and identifying and implementing industry best-practice in the management of gambling harm prevention and responsible service of alcohol.
- **We are dedicated to embedding our commitment to guest wellbeing** throughout the organisation and continuously developing ways to minimise and prevent gaming-related harm through awareness, detection, assistance, and support for our guests.
- **We foster strong and inclusive communities** by empowering others, improving the wellbeing of the people we meet at work and enhancing our work environment.
- **We do not tolerate the use of modern slavery practices** and expect you to create and maintain a work environment that respects human rights, is free from unlawful discrimination and harassment.
- **We make meaningful contributions toward reducing our environmental impact.** We do this through pursuing sustainable procurement, energy, water and waste practices across our operations.
- **We're committed to protecting the health, safety and wellbeing** of the team members who work with us and the people who visit and use our facilities.

What this means for you

- Be aware of guests who are potentially displaying observable signs of gambling harm and provide them with support as soon as practical. If unsure how to provide support, direct the concern to your manager or alert the Crown PlaySafe team located in the Crown PlaySafe Centre in each of our properties.
- Make sure you complete your Crown PlaySafe and Responsible Service of Alcohol training (if required in your role) and comply with Crown's Crown PlaySafe Code of Conduct and other policies and procedures.
- Understand and follow all applicable CrownSAFE health, safety and wellbeing policies, standards, minimum requirements, and procedures that apply to your work.
- Care for yourself, your colleagues and anyone who could be impacted by your work. Stop any work that appears unsafe and immediately report a concern, hazard, or incident if you become aware of it.
- Don't engage in unacceptable actions or behaviours that involve harassment, discrimination, or bullying.
- Make sure that our suppliers and third-party business partners understand that we have the same expectations of them to maintain a safe, inclusive, and respectful working environment.
- Work in a way that respects the human rights of all people who are impacted by our operations. This includes working to ensure that slavery and human trafficking aren't taking place anywhere in our business.
- Take proactive steps to minimise environmental impacts associated with your work. Work with and identify opportunities to mitigate your environmental footprint with suppliers, partners, and guests.
- Report potential or actual environmental incidents

Key policies & more information

- Crown Resorts Limited – Health, Safety and Wellbeing Policy
- Crown Resorts Limited – Crown PlaySafe Policy
- Crown Resorts Limited – Responsible Service of Alcohol Policy
- Crown Resorts Limited – Environmental Policy
- Crown Resorts Modern Slavery Statement

WE STRIVE
FOR EXCELLENCE



- We are passionate about creating exceptional, world-class experiences for our guests. We strive for excellence to deliver on our objectives, enhance our reputation and attract and retain talented team members.
- **We value our guests.** We seek to build and maintain our guests' trust. We do not misrepresent what we can deliver, or the benefits our services can provide. We always try to do the right thing by them, applying the 'Can We? Should We?' test when unsure.
 - **We inform guests about the terms and conditions** of the services we provide, and any changes to them, in clear and simple language.
 - **We communicate openly, fairly and in a timely manner** with our guests and business partners.
 - **We value guest feedback** and handle complaints in accordance with our policies and service standards and work to proactively resolve issues raised.
 - **We identify, manage and control risks** to protect the integrity of our organisation, and achieve our ambitious goals.
 - **We do the right thing by our guests**, meet our obligations, and live our Values, applying the Can We? Should We? test when unsure. We work within our delegated authority.
 - **We value our team members.** We provide benefits and privileges at our properties and expect they are used appropriately and responsibly.
 - **We ensure a safe and enjoyable working environment** and take a zero-tolerance approach to the use of illicit substances in the workplace.

What this means for you

- When things go wrong, be open and honest, so we can put things right.
- Always make sure the information you provide about our services is accurate. Ensure you tell guests all the things they need to know about our services.
- You are responsible for applying for your casino team member licence and it's renewal when required.
- You are not permitted to perform any function of a licenced team member without a licence.
- If required, make sure you complete training on how to manage and resolve issues concerning guest feedback.
- Try to resolve guest complaints at first point of contact or where appropriate. Use your judgment to escalate complaints to the relevant manager or department where appropriate.
- Act fairly and reasonably in all our guest and business dealings.
- Use team member benefits and privileges responsibly.
- If you suspect a minor has been left unattended on Crown premises, notify Security or refer to the police, Child Protective Services or Crisis Care.
- You must not gamble at any Crown property, or with Betfair, or cause other persons to gamble or place bets on your behalf.

| Key policies & more information |
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| <ul style="list-style-type: none">• Crown Resorts Limited – Accounting Policy• Crown Resorts Limited – Complaints Management Policy• Crown Resorts Limited – Employee Licensing and Gambling by Employees Policy• Crown Resorts Limited – Risk Management Framework• Crown Resorts Limited – Incidents, Events and Breach Management Policy• Crown Resorts Limited – Delegations Policy |



LEADERSHIP EXPECTATIONS

We expect all leaders to role model our Values and create an environment where their team members can strive for excellence.

Leaders need to be intentional and considered in how to lead and work with others. This means being mindful about how they show up and interact with team members and guests every day as well as how they support team members in their adherence to Crown's Code of Conduct.

If you manage, supervise, direct, or oversee the work of other team members, you are responsible for:

- Interpreting our Purpose and clearly communicating meaningful expectations to comply with our Values, laws and policies.
- Ensuring team members are competent in their roles by reinforcing these expectations through appropriate performance feedback and consequence management.
- Demonstrating integrity, trust and foresight by role modelling ethical leadership through Can We? Should We? test and explaining to your team how you have worked through complex situations where the right choice wasn't necessarily clear.
- Fostering an environment where your team members feel safe, valued, and respected for speaking up to make things better.



