



MODERN SLAVERY STATEMENT 2023



04	ACKNOWLEDGMENT OF COUNTRY
05	CHAIRMAN'S MESSAGE
06	ABOUT THIS STATEMENT
07	INTRODUCTION
10	STRUCTURE, OPERATIONS AND SUPPLY CHAIN
14	IDENTIFYING MODERN SLAVERY RISKS IN OUR OPERATIONS & SUPPLY CHAIN
16	ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS
24	ASSESSING THE EFFECTIVENESS OF ACTIONS
25	CONSULTATION WITH OWNED AND CONTROLLED ENTITIES
26	APPENDIX A

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.



CHAIRMAN'S MESSAGE

In FY23, we have worked to enhance our modern slavery risk management, to help ensure we continue to identify and manage potential risk areas across our operations and supply chains.

We recognise that this commitment must be supported by meaningful action, and I am pleased at the progress Crown has made in tackling modern slavery risk in FY22 including:

- the successful implementation of our Modern Slavery Remediation Framework which is designed to ensure that we effectively remediate any instance of modern slavery that might arise in our operations or supply chains
- improving the design of our supplier audit process to support a periodic review of our medium to high-risk suppliers
- reviewing our modern slavery training module resulting in the implementation of a new and enhanced training module which was delivered via our Crown Learn platform to a wider team member audience.

I am pleased to sign and present this Statement, which was approved by the Crown Resorts Limited Board on 29 November 2023.

William P. McBeath

William P. McBeath
Chairman,
Crown Resorts Limited





ABOUT THIS STATEMENT

Crown Resorts Limited (Crown) has prepared this Statement in accordance with the Modern Slavery Act 2018 (Cth). The Statement describes the steps taken by Crown and its controlled entities to assess and address risks associated with modern slavery in its operations and supply chain during the reporting period.

This joint statement covers Crown Resorts Limited (Crown) and all Crown Group reporting entities listed (together referred to as the Group or Crown) in Appendix A. The information in this statement offers a holistic description for Crown, except where stipulated information pertains to a specific entity. The entities included in the 2023 Modern Slavery Statement are consistent with those included in Crown's 2022 Modern Slavery Statement and cover Crown's activities throughout the financial year ending 30 June 2023.

This statement was approved by the Crown Resorts Limited Board of Directors on 29 November 2023, in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

INTRODUCTION

Crown is one of Australia’s largest entertainment groups with its core businesses and investments in the integrated resorts sector. We operate three of Australia’s leading integrated resorts – Crown Melbourne, Crown Perth, and Crown Sydney, and are one of the largest hospitality and tourism employers in the country. Our integrated resorts in Melbourne and Perth are the largest single-site private sector employers in Victoria and Western Australia.

Our organisation makes a major contribution to the Australian economy through its role in tourism, employment, and training and through its corporate responsibility programs. During the reporting period, approximately 98% of our revenue was generated from our Australian operations.

As a global issue requiring immediate attention, from which no country is immune, we respect all human rights, and we acknowledge and commit to identify and address modern slavery in our operations and supply chain. We believe that human rights apply to everyone. We are committed to ensuring that through our operations we respect and uphold human rights as set out 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; United Nations Declaration on the Rights of Indigenous Peoples and the International Covenant on Economic, Social and Cultural Rights), coupled with the principles concerning fundamental rights as set out in the Declaration on Fundamental Principles and Rights at Work.

Respecting human rights is aligned with our efforts on preventing bribery and corruption, anti-money laundering and counter-terrorism financing and operating sustainability. In addition, our internal ‘Speak Up Hub’ outlines the many ways our team can raise concerns including Crown’s enhanced Whistleblower Policy.

How we achieved our commitments

Crown continues to develop a program of work to identify and to monitor modern slavery risks. Crown has adopted a continuous improvement model to the monitoring of our operations and supply chain activity including the active monitoring of our modern slavery risks.

In our FY22 statement we highlighted areas that we were going to focus on during FY23.

What we said we would do	What we achieved in FY23
Implement a Remediation Framework including policies and procedures to be followed should a modern slavery event be identified.	We successfully implemented our Modern Slavery Remediation Framework which is designed to ensure that we effectively remediate any instance of modern slavery that might arise in our operations or supply chains
Improve our supplier audit processes, not only through the supplier onboarding process, but also being proactive and conducting periodic reviews of our medium to high-risk vendors. We also committed to design the audit approach.	We improved the design of our supplier audit process capability to support a periodic review of our medium to high-risk suppliers. The supplier audit approach integrates three new factors: <ol style="list-style-type: none"> 1. provision of improved data quality from external data providers, 2. the creation of an automated reporting capability, and 3. incorporation of ongoing monitoring.
We committed to review the content and audience of our modern slavery training.	We undertook a review of our existing modern slavery training module. As a result, we implemented a new and enhanced training module which was delivered via our Crown Learn platform. <p>Additionally, we delivered the training to a wider audience across the group, providing greater awareness of our modern slavery risks. This audience includes team members that have interactions with suppliers, including those authorised to enter contract negotiations on behalf of Crown and the Procurement Team.</p>

Further enhancements implemented in FY23

In addition, in FY23 we initiated several other group-wide enhancements. Some of those initiatives which underpin our approach to assessing and addressing our modern slavery risk included:

Refreshed policies and training

During the reporting period we refreshed many of our groupwide policies via our 'Policy Uplift Program'. This program of work included the launch of a new platform to ensure easy access for all team members to the policies to assist in making informed decisions.

In specific support of our approach to managing modern slavery risk, we refreshed our Code of Conduct and Whistleblower Policy. Underpinning these policies is refreshed training content via our dedicated Crown Learn platform.

We also rolled out our new Risk and Compliance Training to ensure all team members understand their obligations and the behaviours we all need to embrace to ensure we are operating at the highest levels of governance and compliance.

Whistleblower Protection Officer Appointed

Crown Resorts recently appointed a Whistleblower Protection Officer to protect and safeguard disclosures and ensure integrity of the reporting mechanisms.

System Enhancements

Over the past 12 months we enhanced many of our systems including the introduction of a dedicated Governance, Risk & Compliance tool – ARCHER. This tool helps us to centrally manage risks, controls, obligations, and incidents which has unified our way of working.

Additional Resourcing

Also, during this period, we expanded a number of teams which have oversight in key areas of the business that may affect our modern slavery processes. Our Procurement Team recruited additional members to assist with our vendor screening and due diligence processes.

Additionally, we built a dedicated Environment, Social and Governance (ESG) Team. The ESG Team has, amongst many portfolios, ownership of the modern slavery compliance obligations. The ESG and Procurement Teams work closely with each other, as well as with our Risk, Risk Assurance and Compliance functions.

Looking forward to FY24

We are committed to strengthening our practices to identify and address any gaps in our governance or controls which may affect how we assess and manage our modern slavery risks. Our desire to embrace continuous improvement means that we will identify and document opportunities to improve our governance and processes. Therefore, our key FY24 modern slavery governance and process improvements will include:

Enhanced assurance of our operations

In FY24 we are committed to reviewing our assurance practices to ensure we appropriately assess the effectiveness of our actions in addressing modern slavery risks in our operations. We will work closely with our risk and assurance teams and other business partners, including our subsidiary reporting entities, to review our current processes and identify areas to improve how we assess the effectiveness of our actions to manage our modern slavery risks.

Refresh of our Human Rights Policy

We are also committed to refreshing our Human Rights Policy to better reflect our values and to include a greater emphasis on the steps we are taking to reduce our risk of modern slavery in our operations and/or supply chains. The refresh of this policy will be designed to understand the salient human rights issues that may impact us, our guests, team members or any other person directly or indirectly affected by our actions. We believe we can mitigate risks, prevent harm and support better outcomes for our stakeholders.

Procurement

We are committed to using the newly implemented supplier engagement framework to further understand and mitigate the modern slavery risk of our higher risk suppliers as identified in FY2023.

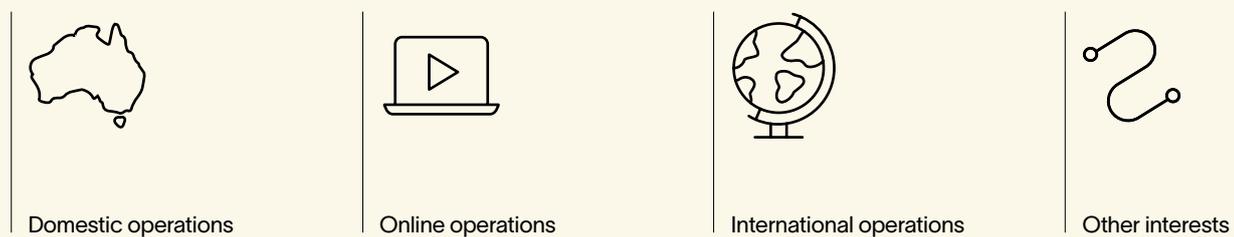
We will continue to focus on increasing the modern slavery data quality of our suppliers, including those supplying our subsidiary reporting entities, with the objective of improvement in the assessment methodology to highlight potential modern slavery risk.



STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our structure and operations

The Crown Group is made up of four broad operational areas:



Domestic operations

Our primary domestic operations are:



Melbourne

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



Perth

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.



Sydney

Crown Sydney is located at Barangaroo on the foreshore of Sydney Harbour and features 349 hotel rooms and suites, world-class gaming, signature restaurants, bars, luxury retail outlets, pool and spa facilities and conference rooms.

Online operations

Our wagering and online social gaming operations are comprised of Betfair Australasia, a 100% owned online betting exchange, and DGN Games, a 100% owned online social gaming business. DGN Games has approximately 150 employees located across Israel, Ukraine and the United States.

Betfair is Australia's largest betting exchange – an online, peer-to-peer wagering platform that services Australian and New Zealand customers. Betfair's customers can bet against other customers, both locally and internationally. At the end of the reporting period, Betfair had approximately 132 employees located in Australia.

Overseas

Crown owns and operates Crown London, one of the high-end licensed casinos in the West End entertainment district. At the end of the reporting period, Crown London had approximately 196 employees located in London.

Other interests

Our other interests include the following:

1. 50% equity interest in Aspers Group, a UK-based regional casino operator,
2. 50% equity interest in Chill Gaming, a joint venture focused on innovation and developing new entertainment products, and
3. 20% interest in Nobu, the lifestyle hotel and restaurant brand.



Our Workforce

Crown Group Employees FY2023

Crown Resorts	12,124 (including 2,647 casual employees)
Crown London (UK)	196
Betfair	132

Our Revenue

Crown Group Revenue by Jurisdiction FY2023

Australia	AUD 2,726.6 million (98% of total revenue)
UK	AUD 21.8 million (1% of total revenue)
Other	AUD 36.4 million (1% of total revenue)
Total	AUD 2,784.8 million

Our Supply Chain

During the reporting period, Crown procured approximately \$1.2 billion of goods and services from approximately 5,400 suppliers. Our suppliers are categorised as follows: Food and Beverage (including General supply), Property and Facilities, Corporate Services, IT and Gaming, Marketing, Supply Chain and Government.

Approximately 93% of total spend from our Australian-owned and controlled operations during the reporting period was with direct Tier 1 suppliers (suppliers we directly procure from) located in Australia and pertained to Crown Resorts' operations.

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.



IDENTIFYING MODERN SLAVERY RISKS IN OUR OPERATIONS & SUPPLY CHAIN

Whilst we understand that modern slavery risks are global we are committed to reducing those risks. We also understand that the modern slavery risks we face are subject to social and political issues outside of our or our government's control and therefore our modern slavery risk profile is continually changing.

The behaviours and practices which constitute modern slavery are serious forms of 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. Our approach to managing our risks is shaped by the UN Guiding Principles on Business and Human Rights (UNGPs).

We set out in Section 6 of this statement how we have diligently assessed the modern slavery risks that we face.

Understanding our operations and supply chain risks

Whilst we operate mostly within the confines of Australia, we understand that the level of modern slavery risk we face is derived from multiple interconnected factors such as:

1. Geographical
2. Product Category and Industry
3. Business models
4. Vulnerable populations

Our Modern Slavery Risk factors

01

High risk geographies

High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance

02

High risk categories /sectors

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.

03

High risk business models

Business models that rely on third parties for the provision of services - eg. labour hire.

04

Vulnerable populations

Groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations

We also acknowledge that where multiple risk factors co-exist there is a higher likelihood that harm may be experienced, and we consider these during our risk assessment processes.

We work to proactively identify potential modern slavery and broader human rights risks across our global operations and supply chains by monitoring modern slavery trends, changes in legislation and through academic and societal commentary.

Conceivable risks in our operations and communities

We understand that we operate within industries that may have a higher risk of modern slavery, such as forced labour and forms of debt bondage within vulnerable communities.

Whilst we recognise these risks, we also accept that there is a lower modern slavery risk relating to our operations, particularly our workforce. This is largely due to our robust recruitment processes, our policies and our enhanced training practices. Additionally, all team members and suppliers have access to our recently enhanced grievance and reporting platforms as well as an increased focus on group-wide risk management.

Potential modern slavery in our hospitality operations

Understanding if we are directly linked or contributing to modern slavery involving our workforce.

The hospitality industry is seen as a higher modern slavery risk industry. Whilst we recognise this fact, we have assessed the risk of modern slavery in our hospitality services as low. We understand that contracted workers, including those from labour hire companies we engage, may be more vulnerable due to the nature of the lower skills required to perform the roles and a significant proportion of migrant and temporary personnel fulfilling those roles. For example, our housekeeping cohort.

Conceivable risks in our supply chains

We accept that modern slavery risks exist in our supply chains. We also accept that identifying and assessing modern slavery in tier 2 suppliers and beyond creates an additional set of challenges. Within our 'direct' supplier relationships we have developed and implemented a universal approach to assessing those risks. See Section 5 for a detailed description of how we assess our risks.

Potential modern slavery in our supply chain

Understanding if we are directly linked to modern slavery through the purchasing of goods for resale in our Crown Gifts stores and use in our operations.

We procure from many different industry groups, some of which may pose a higher modern slavery risk; from luxury textiles such as bedding and bathrobes, through to a selection of fine wines and cigars. We recognise that modern slavery risks in these supply chains create a challenge to identify and address the risks, however we employ a number of due diligence processes of our supply base to mitigate these risks.

During this reporting period no instances of modern slavery were identified in our operations or supply chain, and we did not receive any reports through our reporting platforms. Crown recognises 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.

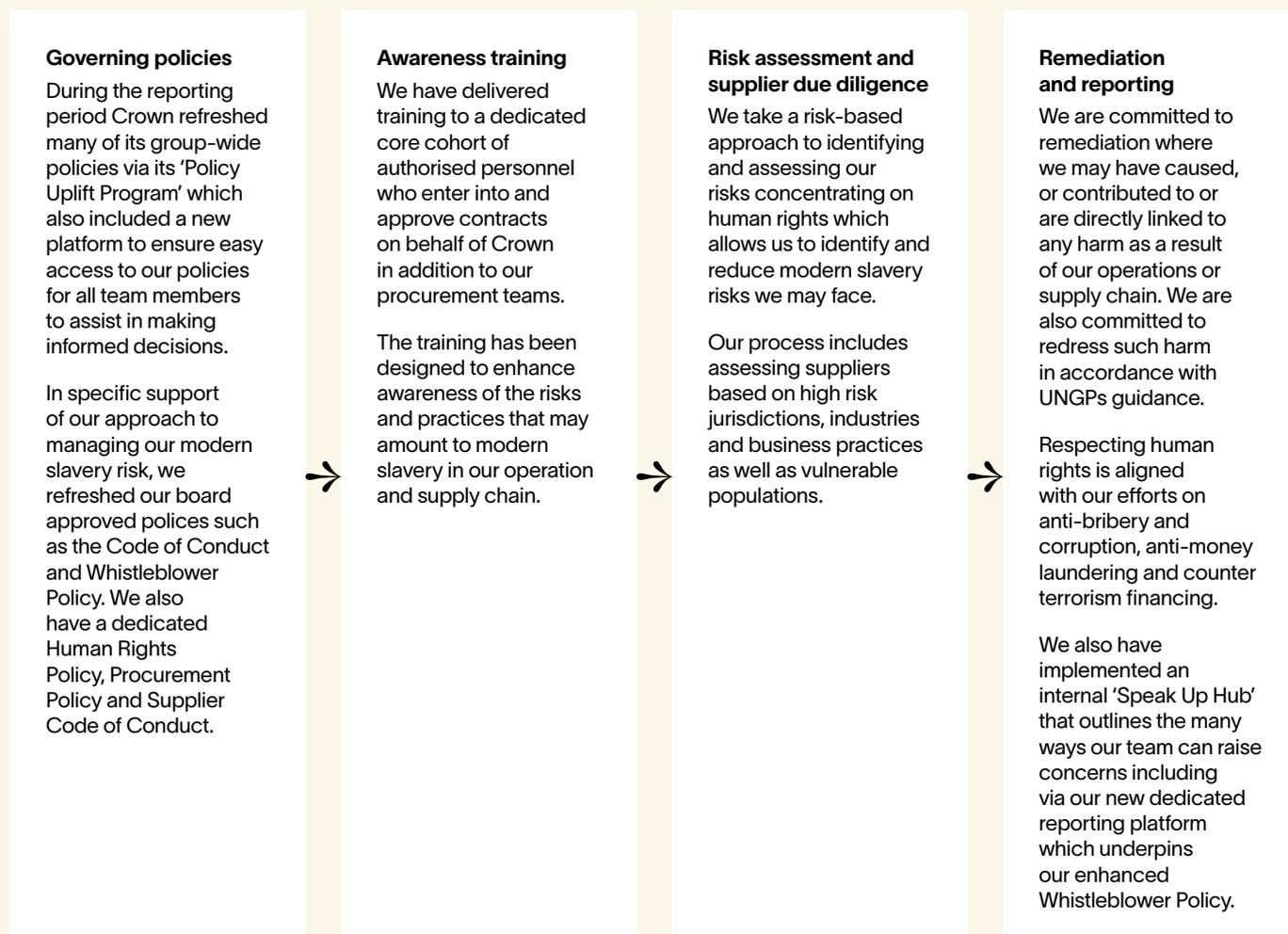


ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

Integrated resorts are a layered and complex business spanning many industries within their own premises, including entertainment, gaming and hospitality. In this regard and due to the earlier work completed in this area as set out in previous statements, we understand our modern slavery risk profile will change and evolve as we evolve. Further, in line with the UNGPs, we understand the potential for our business to cause, contribute to, or be directly linked to modern slavery.

We have a proactive approach to identifying and assessing risks in our operations and supply chains, as well as a robust remediation process should harm be identified. Our response and actions to assess and address modern slavery risks in our operations and supply chain are based on four key foundations:

- Governing policies.
- Awareness training.
- Risk assessment and supplier due diligence.
- Remediation and reporting



Governing Policies

To support our framework in addressing our modern slavery risks within our operations and supply chains we have several Board approved policies.

Human Rights Policy

We have identified the following human rights issues where we believe we can mitigate risks, prevent harm or support better outcomes for our team members, guests, suppliers and other communities. The areas identified are modern slavery, labour rights, health and safety, equality and discrimination and Indigenous rights. Adopted by the Board, the Human Rights Policy articulates our commitment to understanding and acting on the impact on people of our business activities and supply chain. In respect of modern slavery, we have committed to identifying and addressing the risk of modern slavery practices in our operations, our supply chain and other business relationships.

Code of Conduct

Our Code of Conduct underpins our commitment to ethical behaviour, responsible business practice and good governance. Underpinned by our values, our Code of Conduct ensures we meet the expectations of our stakeholders, including our guests, team members, governments, regulators and communities in which we operate.

Our Code of Conduct guides our daily decisions, encourages team members to perform at their best, and inspires our teams to live our values while acting responsibly.

Whistleblower Policy

Our Whistleblower Policy is designed to promote and support a culture of integrity and ethical behaviour and to encourage the reporting of misconduct and wrongdoing. The Board recognises the important role whistleblowing can play in the early detection of misconduct. Crown's Whistleblower Policy sets out:

1. the disclosures which qualify for protection;
2. how disclosures can be made and to whom;
3. the process for investigating disclosures; and
4. the importance of maintaining confidentiality and protection against victimisation. The procedure for investigation and how disclosures may be made considering protection of identity and confidentiality are outlined in the policy and procedures.

Whistleblowers are encouraged to use our Whistleblower platform, managed by Core Integrity, to make a disclosure under this policy. Core Integrity is an independent and confidential service which is available 24 hours a day, seven days a week.

Core Integrity is also accessible to all of our suppliers.

Procurement and Supply Chain Policy

The Procurement and Supply Chain Policy ensures that the procurement of all goods and services is conducted in an honest, competitive, fair and transparent manner that delivers the best value for money outcome, whilst at the same time protecting our reputation, taking into account the required specification, quality, service, delivery and reliability of the supplier and the goods and/or services, as well as other factors, including environmental, social and governance considerations.

This policy sets the engagement rules of Procurement & Supply Chain for the business, the principles underlying the purchasing activities, Supplier Relationship Management, and the directives specific to the importation of goods.

Supplier Code of Conduct

We aim to model good business practices, promoting a collaborative relationship where we and our suppliers work together to build a fair, professional and respectful business relationship. Our Supplier Code of Conduct sets out the minimum standards of behaviour that we expect our suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.



Training and awareness

To identify and address our modern slavery risks we need our team members to be the first line of defence and understand the red flags that may indicate modern slavery activity.

We have selected an online training module designed to demystify modern slavery and will build awareness within our teams. The key learning outcomes include helping our team members understand what modern slavery is, identify risks in our operations and supply chains, and how to raise concerns.

As stated in the section 'How we achieved our commitments', we undertook a review of our former modern slavery training module. In FY23 we delivered the training to a wider audience across the group providing greater awareness of our modern slavery risks. This audience includes staff that have interactions with suppliers, including those authorised to enter into contract negotiations on behalf of Crown and the Procurement Team.

In addition to modern slavery training all our team members were required to complete the following training modules via our dedicated Crown Learn platform:

- Risk and Compliance
- Speak Up and Whistleblower
- Code of Conduct
- Anti-Bribery and Corruption

By the end of 2024, our goal is to have 100% of the training audience complete the modern slavery training.

Supply chain risk assessment and supplier due diligence

It is widely acknowledged that modern slavery cannot be tackled in isolation and should be done in conjunction with our suppliers. As such we commenced building stronger relationships with our suppliers in FY22 and this has continued throughout FY23.

Onboarding: qualification process

Modern slavery risk is assessed from the supplier qualification and onboarding process in the following ways:

- All procurement tender documents and tender decision tools have integrated modern slavery considerations and/or assessments. Through this integration we have made modern slavery a mandatory consideration prior to commencing business with a supplier.
- The onboarding process also includes an assessment of sanctions and enforcements, watchlists, adverse media, politically exposed persons and basic human rights. Additionally, any current supplier is monitored on an ongoing basis.
- We also utilise a supplier onboarding questionnaire for our Australian operations. This questionnaire is completed by a large cohort of suppliers and provides transparency and insight about the sustainability of our suppliers, including health and safety, human rights and environmental impacts. Prospective suppliers are required to complete a detailed questionnaire as part of our prequalification and risk assessment processes.

Supplier contracts and purchase order terms and conditions

Our supplier contracts and purchase order terms and conditions include clauses pursuant to complying with our Human Rights Policy and the Modern Slavery Act 2018 (Cth). In addition, the terms and conditions specify that a supplier must notify us of any identified instances of modern slavery in its operations and supply chain.

Supplier relationship management

Supplier relationship management meetings take place following the engagement model set out in the Supplier Relationship Management Framework. A supplier scorecard is used which includes criteria on compliance with labour laws and subcontracting arrangements.

Supplier Modern Slavery assessment: methodology

The first stage of the modern slavery assessment process is generated by our supplier 'onboarding process. Based on value and lifespan in our operations, suppliers are assessed in a specific database. For the FY23 reporting period, 61.8% ongoing suppliers were assessed. It is through this platform that suppliers complete the Modern Slavery Questionnaire. The completion rate of the Modern Slavery Questionnaire to date is 60.1%.

The second stage of the modern slavery assessment process is to map the inherent potential modern slavery risk. We assess our suppliers against four factors:

1. High Risk geographies
2. Vulnerable populations
3. High Industry risk categories
4. High Risk business model

Where a supplier is rated as high risk in at least one of these factors as part of the inherent risk assessment, they are subject to a detailed review to assess the residual risk by assessing the existing monitoring factors. As a result, we can identify the material suppliers within our supply chain in which modern slavery may more likely occur.

Second phase assessment

Following the initial assessment process which specifically identifies suppliers' risk of potential exposure to modern slavery, we re-evaluate high risk suppliers on an ongoing basis.

We continue to review and refine our supply chain modern slavery risks to determine if our procurement operations or supply chain are linked to any instances of modern slavery harm and we assess our ability to remediate any such harm.

Our Supplier Code of Conduct

Our Supplier Code of Conduct sets out the minimum standards of behaviour that we expect our suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.

Suppliers are required to read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate the Supplier Code of Conduct to related entities, their own suppliers and subcontractors who support them in supplying to us, so they are aware of, understand and comply with it.

Suppliers' ability to meet or exceed standards detailed in the Supplier Code of Conduct will be a key consideration when we make procurement decisions as we expect all suppliers to adhere to it.

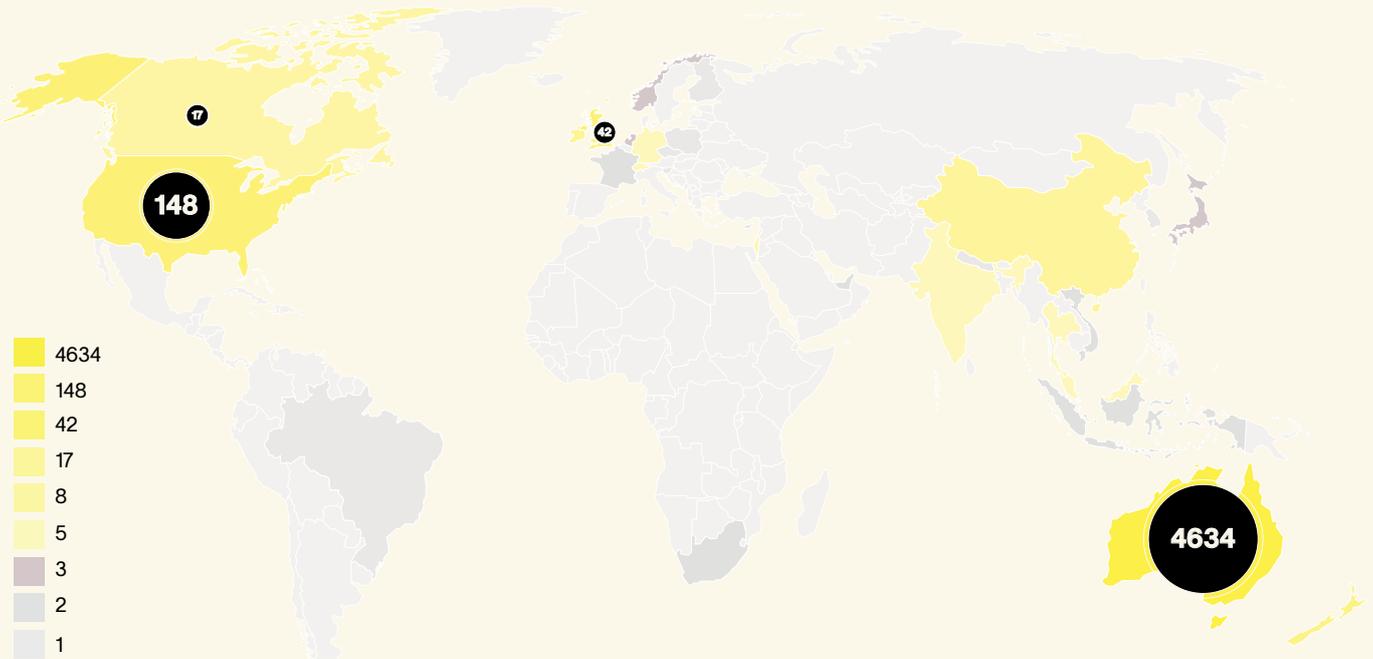
Specifically, our Supplier Code of Conduct states:

We expect suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities. As such, our suppliers should comply with all relevant laws including the Modern Slavery Act 2018 (Cth) and international human rights and modern slavery laws, declarations and any other mandatory human rights, due diligence legislation or modern slavery reporting requirements. Suppliers must not engage or support any trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Identification process: inherent risk mapping

Factor 1: High risk geographies

The high risk geographies include countries and regions that are vulnerable to bribery and corruption, or without strong labour laws and governance. The classification used in this assessment is the one provided by the Global Slavery Index 2023 (from: www.globalslaveryindex.org). Our suppliers are located as follows:



The classification in use ranges from category AAA for countries that have an effective and comprehensive government response to modern slavery through to category D, with a wholly inadequate local government response to modern slavery risks.

6.6% of our international suppliers are operating in countries that have a higher risk of modern slavery. This represents less than 1% of our total supplier cohort.

Factor 2: Vulnerable population

The vulnerable population factor aims to identify groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. Directly correlated with the geographic risk, the level of worker vulnerability and risk of poor labour practices and exploitation are also recognised to be higher in contexts where lower skilled labour is relied upon.

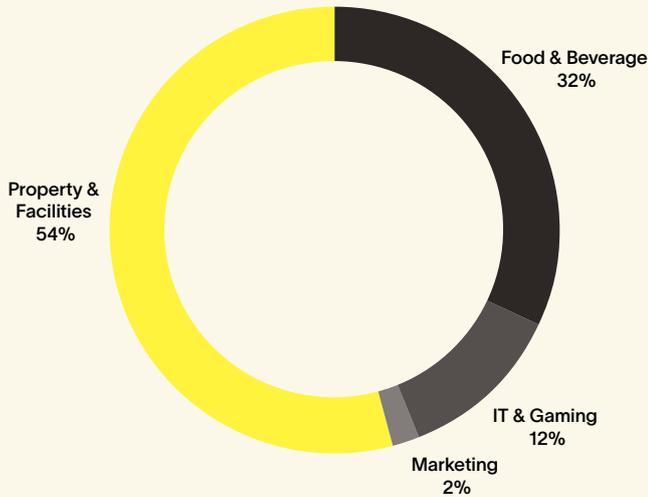
A review of the responses to our Supplier Questionnaire helps us to assess the potential risk of contracting with suppliers who may have vulnerable populations within their supply chain. When we analysed the responses to the question "Is your product or service provided to Crown subject to seasonal peaks and troughs, whether in demand or availability?" we identified 167 suppliers that have a potential high-risk vulnerable population within their supply chain. The three prominent industry categories were: "Food & Beverage" (39.5%), "Corporate Service (including labour hire)" (21%) and "Property and Facilities" (16.8%).

Factor 3: Industry risk category

We use an ANZSIC Classification tool to assess modern slavery risk in our supply chain, recognising that industries that rely heavily on low skilled labour and/or involve dirty, dangerous, and difficult work have a higher prevalence of inherent modern slavery risk.

91 suppliers have been rated as operating in higher risk industries, with the main two categories being "Food & Beverage" (31%), and "Property and Facilities" (53 %).

% of Supplier Per Category (Moderate to High Risk)



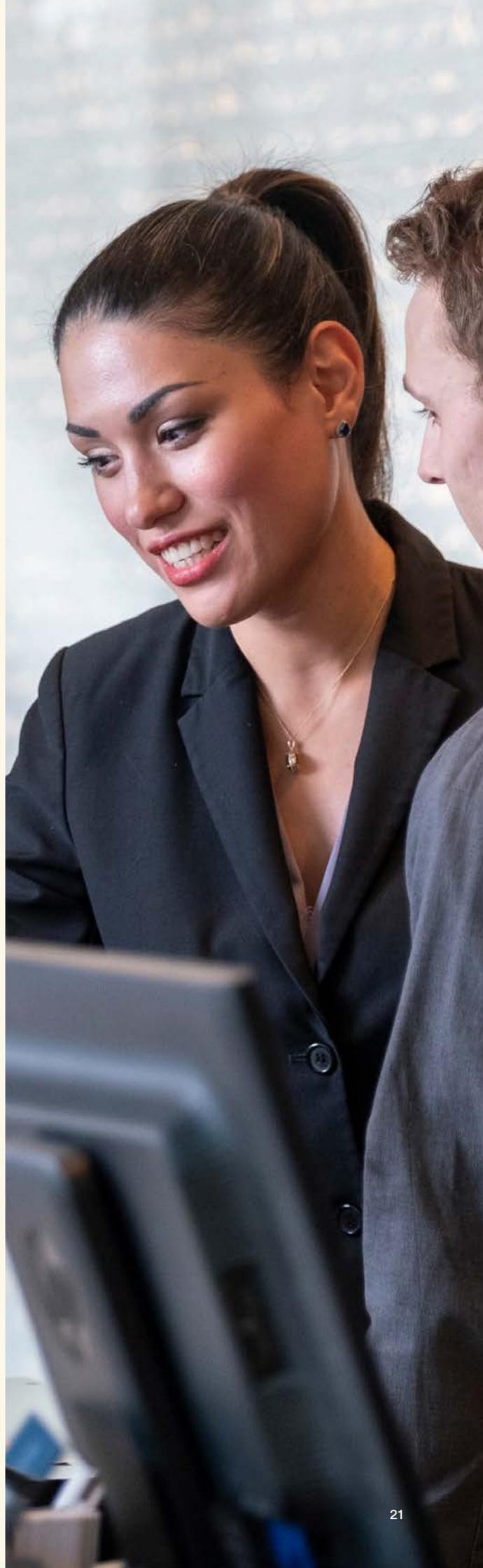
Factor 4: High risk business models

High risk business model analysis aims to identify suppliers with business models that rely on third parties for the provision of services (e.g. labour hire), that therefore may have a higher risk of modern slavery in their supply chain.

The analysis of responses to our Supplier Questionnaire identified that 12.4% of suppliers in our supply chain may have a higher risk of modern slavery in their operations or supply chains due to their business model. Of those 12.4% of suppliers the main categories of business models were in the following industries: Food & Beverage (22%), Corporate services (including labour hire) (24%), and Property & Facilities (23%).

Identification process: risk mapping

During our risk mapping processes, we identified 604 suppliers with at least one of the four factors with a high-risk rating. After further factor analysis and measuring the resilience strength of the supplier against modern slavery risks, we established that 17 suppliers' governance processes to address the potential modern slavery risks could be improved. Those 17 suppliers are evenly dispersed within our supplier categories. In FY24 these 17 suppliers will be subjected to a deep dive into their modern slavery governance processes.



Remediation & Reporting

As set out in our FY22 Modern Slavery Statement, we have a dedicated remediation framework and documented process to follow should we receive a report, either internally or from an external source, of a perceived or actual activity that may amount to modern slavery.

As set out in our Human Rights Policy, where we become aware of any grievance that we may have caused, or contributed to, we will seek to remediate following the UNGP's guidance. We are aware that being part of a global economy means we have suppliers we engage with outside our jurisdictions and that we do not have direct control of or directly deal with (e.g. Tier 2 suppliers etc). Similarly, should we become aware of a grievance where we are directly linked to an event, we will also follow the UNGP's guidance.

Reporting a grievance

Grievance mechanisms are the cornerstone of the Modern Slavery Remediation Framework. It is designed to record and resolve adverse impacts we may have caused or contributed to as part of our activities.

We are committed to listening. We take allegations and evidence of adverse human rights impacts seriously. Team members are encouraged to report any human rights related concerns that arise, including if they suspect adverse human rights impacts may occur or have occurred.

We have a dedicated channel for team members and suppliers and other eligible whistleblowers to raise concerns, including human rights related concerns. All reports received are confidential and matters deemed to be protected disclosures are managed in accordance with our Whistleblower Policy as directed by our dedicated Whistleblower Committee. Our team members receive annual training on our Whistleblower Policy and procedures and the Whistleblower Policy is publicly available on our websites.

The process of responding to issues of modern slavery

Our response to issues of modern slavery in our operations and supply chain are articulated around seven concepts. These concepts are – victim centred, context specific, transparent, accessible, responsible, collaborative and action-focused.

The response has three stages:

1. Reporting and protection
2. Information gathering
3. Provision of remediation



ASSESSING THE EFFECTIVENESS OF ACTIONS

At Crown, we adopt a group-wide continuous improvement approach to everything we do. Assessing the effectiveness of our actions to identify and address modern slavery risks in our operations and supply chain is no exception.

Our fundamental processes in pursuit of minimising our modern slavery risks and enhancing the identification of such risks lies in our:

- Policies and processes which set the standards for our behaviours,
- Documented and reported risk assessment processes,
- Enhanced and well publicised 'Speak Up' grievance platform and dedicated training rolled out to our team members.

Reinforcing this is our Board approved Risk Management Framework adopting the three lines of defence model which is designed to support the execution of the risk management across our organisation.

1st Line All Team Members	All employees form the first line defence and assume ownership of and accountability for the management of the material risks faced and effective implementation of the Risk Management Framework.
2nd Line Risk Management Function, Financial Crime & Compliance Assurance Team, Compliance and Responsible Gaming	Provides oversight, support and advice to Management in respect of the Risk Management Framework
3rd Line Internal and External Audit Independent Assurance	Provides independent assurance to the Board via the Audit & Risk Committee.

During this reporting period our 1st and 2nd Line functions have tracked the effectiveness of our actions by:

- Continuously reviewing our supplier due diligence process
- Enhancing our training in key areas pertinent to modern slavery risks and then tracking the completion rates of such training
- Appointing a dedicated Whistleblower Protection Officer, enhancing the grievance reporting platform and providing dedicated training

In addition, during this reporting period our 3rd Line function conducted assurance activities in relation to assessing the effectiveness of our actions in the following areas:

- Internal audit of the content and processes in drafting our FY22 Modern Slavery Statement
- Internal review of the robustness of our Human Rights Policy
- Internal audits of:
 - Conflicts of Interest Policy and processes
 - Whistleblowing Policy and processes
 - Employee Grievance Resolution
 - Vendor Management Lifecycle
 - Ongoing review of our 'Policy Uplift Program'

As we mature in our approach to modern slavery, our processes will continue to evolve and our ability to assess the effectiveness of our actions will be enhanced.

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

To assist in carrying out its responsibilities, during the reporting period, the Crown Resorts Limited Board utilised the following standing committees:

- Audit and Finance Committee
- People & Culture Committee
- Risk, Compliance & Responsible Gaming Committee

The Crown Board also has dedicated Audit and Finance Committees, People and Culture Committees and Risk, Compliance and Responsible Gaming Committees for Crown Sydney and Crown Perth and for Crown Melbourne. These committees are responsible for the oversight of Crown's modern slavery risks and are ultimately accountable to the Crown Resorts Risk Committee and Crown Board.

We are committed to ensuring that our approach to modern slavery is standardised across each of our reporting entities. We continue to engage with relevant business units across our various properties on human rights and modern slavery in several different ways including:

- Internal audits of various business unit operations, policies and processes
- Dedicated training activities
- Discrete support services in relation to worker rights
- Targeted supplier due diligence

The identification, assessment and management of modern slavery risks as outlined in this Statement remain within the business units. These activities help embed our human rights approach across all our entities. In addition to our 'business as usual' daily consultation processes in a broader context, we also consulted with representatives across the business. These representatives come from a number of pertinent business units including Environmental, Social & Governance; Procurement & Supply Chain; Internal Audit; Group Risk Management; Corporate Affairs; Learning & Development; Organisational Development and our Finance teams.

Crown London publishes a stand-alone Modern Slavery Statement under the Modern Slavery Act 2015 (UK).

APPENDIX A

Our 2023 reporting entities

This joint statement is made on behalf of Crown Resorts Limited (ABN 39 125 709 953), an Australian Modern Slavery Act reporting entity. Each reporting entity, other than Crown Resorts Ltd, is a wholly owned subsidiary of Crown Resorts Ltd.

Australian Reporting Entity	Description
Betfair Australasia Pty Ltd (ABN 77 110 084 743)	Holding company, immediate parent of Betfair Pty Ltd
Betfair Pty Ltd (ABN 30 110 084 985)	Online betting exchange operator in Australia
Burswood Limited (ABN 36 075 071 537)	Holding company
Burswood Property Trust (ABN 35 491 489 282)	Trustee: Burswood Nominees Limited, Owner of Burswood Resort (Management) Ltd
Capital Club Pty Ltd (ABN 85 078 251 439)	Owner and operator of Capital Golf Club
Crown (Western Australia) Pty Limited (ABN 73 095 976 275)	Holding company
Crown CCR Group Holdings One Pty Ltd (ABN 73 128 565 793)	Holding company, parent of Crown Asia Investments Pty Ltd
Crown Entertainment Group Holdings Pty Ltd (ABN 82 126 028 822)	Holding company, main head office operating entity
Crown Resorts Foundation Private Ancillary Fund (ABN 25 454 812 059)	Private Ancillary Fund
Crown Melbourne Limited (ABN 46 006 973 262)	Owner and operator of Crown Melbourne
Crown Sydney Property Pty Ltd (ABN 12 166 326 861)	Owner and operator of Crown Sydney property
Crown Sydney Gaming Pty Ltd (ABN 97 166 326 843)	Owner of Crown Sydney's gaming licence
Crown Resorts Limited (ABN 39 125 709 953)	Holding company
Jemtex Pty Ltd (ABN 78 109 861 663)	Holding company, immediate parent of Betfair Australasia Pty Ltd
Melbourne Golf Academy Pty Ltd (ABN 81 086 098 339)	Operator of Melbourne Golf Academy



