



# MODERN SLAVERY STATEMENT 2025



<b>ACKNOWLEDGMENT OF COUNTRY</b>	04
<b>CHAIRMAN'S MESSAGE</b>	05
<b>1. ABOUT THIS STATEMENT</b>	06
<b>2. INTRODUCTION</b>	07
HOW WE ACHIEVED OUR COMMITMENTS IN 2024	08
<b>3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN</b>	10
OUR STRUCTURE AND OPERATIONS	10
OUR SUPPLY CHAIN	12
<b>4. IDENTIFYING MODERN SLAVERY RISKS IN OUR OPERATIONS &amp; SUPPLY CHAIN</b>	14
UNDERSTANDING OUR OPERATIONS AND SUPPLY CHAIN RISKS	14
CONCEIVABLE RISKS IN OUR OPERATIONS AND COMMUNITIES	15
CONCEIVABLE RISKS IN OUR SUPPLY CHAINS	15
<b>5. ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS</b>	16
GOVERNING POLICIES	17
MODERN SLAVERY RISK ASSESSMENT AND CONTROLS	18
SUPPLIER CONTRACTS AND PURCHASE ORDER TERMS AND CONDITIONS	20
REMEDATION & REPORTING	21
<b>6. ASSESSING THE EFFECTIVENESS OF ACTION</b>	22
<b>7. CONSULTATION WITH OWNED AND CONTROLLED ENTITIES</b>	24
<b>APPENDIX A</b>	26

# 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

Crown remains deeply committed to upholding human rights and proactively managing modern slavery risks across our supply chains, guided by responsible business practices that deliver meaningful outcomes.

Pillar Three of our Crown '29 Strategy – Be a Really Well-Run Business – reinforces this commitment by improving how we identify, monitor, and respond to modern slavery risks.

In FY25, we built on our progress, improving operational oversight and embedding stronger accountability. Key achievements included:

- Refining supplier risk assessment and governance frameworks to better identify risks.
- Focusing resources to maximise impact.
- Improving supplier data integrity to accurately identify active suppliers and enable more targeted risk assessments, monitoring, and decision-making.

- Collaborating with key stakeholders to align our Modern Slavery Statement with broader business processes, ensuring a consistent and well-understood approach across Crown.

I am pleased to sign and present this Statement, which was approved by the Crown Resorts Limited Board on 16 December 2025.

**John Borghetti**  
Chairman,  
Crown Resorts Limited





# 1. 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 2025 Modern Slavery Statement cover Crown's activities throughout the financial year ending 30 June 2025.

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

# 2. 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. 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 Whistleblower Policy outlines the many ways our team and our suppliers can raise concerns in respect to these issues.

## How we achieved our commitments in 2025

In FY25, we continued our journey of continuous improvement to assess, manage, and effectively address modern slavery risks within our operations and supply chain.

What we said we would do in FY25	What we achieved in FY25
<p>In our FY24 statement we highlighted areas of focus for FY25. Our commitments for FY25 included:</p> <ul style="list-style-type: none"> <li>Enhance supplier due diligence and risk management through a new governance framework and supporting documentation.</li> <li>Improve modern slavery data quality and methodology to better identify potential risks.</li> <li>Strengthen oversight and assurance activities across risk assessment and statement development.</li> </ul>	<p>From the commitments we made for FY25, we achieved progress in several areas and laid the foundation for others, which will continue into FY26. In FY25 we delivered on:</p> <p><b>a) Supplier risk assessment and due diligence:</b> We recalibrated our supplier risk assessment approach and strengthened the Governance Framework to better classify suppliers by the likelihood of modern slavery and reinforced due diligence processes in line with Crown's risk appetite. This refinement enables Crown to focus resources where they have the greatest impact and improve our ability to manage risk effectively across the supply chain.</p> <p><b>b) Data Quality improvements:</b> We strengthened the integrity of our supplier data by leveraging tools within the new Governance Framework to accurately identify active suppliers we transact with and that are part of Crown's procurement and supply chain activities. This refinement reduced our supplier baseline by 40%, ensuring our risk assessments focus on the suppliers that matter most and enabling more effective monitoring and informed decision-making.</p> <p><b>c) Oversight and collaboration:</b> We continued working with stakeholders across the supplier lifecycle to maintain oversight, accountability, and assurance of modern slavery risk management. We also explored ways of strengthening the connection between our Modern Slavery Statement and broader governance and business processes, with the goal of making our approach consistently applied and clearly understood across the organisation.</p>

## Looking forward to FY26

Crown remains committed to strengthening our ability to identify, monitor, and address modern slavery risk across our operations and supply chain. Building on the progress made in FY25, our FY26 focus will be driven by risk assurance, governance, supplier targeted engagements, and business awareness as detailed in the following key initiatives:

**Policy and Governance Enhancements:** Update the Supplier Code of Conduct and Procurement Policy to embed the enhanced Governance Framework and a new Supplier Risk Management Framework. These enhancements will strengthen how Crown integrates modern slavery risk assurance into procurement practices and improve the way obligations and accountability are communicated across our operations and supply chains ensuring both Crown and its suppliers clearly understand their responsibilities and are equipped to monitor and address risks effectively.

**Supplier Risk Management Framework:** Develop and implement a strengthened Supplier Risk Management Framework that builds on our existing processes to better assess inherent risks including modern slavery associated with suppliers, their core activity and sector, and the nature of the goods and services they provide. This enhanced framework will enable more consistent due diligence before onboarding and improve controls to manage residual risks, supporting stronger supplier engagement and ensuring both Crown and its suppliers have the capability and processes to identify, monitor, and address potential risks across the supply chain effectively.

**Targeted Supplier Segmentation:** Conduct deep-dive reviews of suppliers with a higher likelihood of modern slavery risk within their operations and supply chains. This initiative will focus on understanding supply chain complexity and working collaboratively with these suppliers to strengthen governance, improve operational practices, and support remediation where needed.

**Empowering Awareness and Accountability:** Embed awareness, accountability, and practical guidance to integrate modern slavery risk management across the procurement lifecycle and supplier engagement. This commitment will be supported by defined frameworks, targeted training, accessible resources, and digital tools that provide clear processes for effective decision-making, risk assurance, and strengthen controls aligned with Crown Policies.



# 3. 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 is Perth's ultimate entertainment destination, 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.

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 120 employees located in Australia.

## Other interests

Our other interests during the period include 50% equity interest in Apsers Group, a UK-based regional casino operator.

## Overseas

Crown owned and operated 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 188 employees located in London.

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



● Crown ● Crown London ● Betfair Australasia

## Our Workforce

### Crown Group Employees FY2025

Crown Resort	11,857 (including 1,959 casual employees)
Crown London (UK)	168
Betfair	118

## Our Revenue

### Crown Group Revenue by Jurisdiction FY2025

Australia	AUD 2,799.7million (98% of total revenue)
UK	AUD 35.7 million (1% of total revenue)
Total	AUD 2,835.4 million

## Our Supply Chain

During the reporting period, Crown procured approximately \$840M of goods and services from approximately 3,900 suppliers.

### Our supplier categories based on spend:

Property and Facilities	28%
IT and Gaming	19%
Food and Beverage (including general supply)	26%
Corporate Services	16%
Marketing	10%

Approximately 95% 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.

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.



# 4. IDENTIFYING MODERN SLAVERY RISKS IN OUR OPERATIONS & SUPPLY CHAIN

Whilst we understand that modern slavery risks are global, and we are committed to understanding and 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 5 of this statement how we have assessed the modern slavery risks that we face.

## Understanding our operations and supply chain risks

Although our operations are entirely within Australia and our supply chain is primarily serviced by suppliers based in Australia, we recognise that modern slavery risk can still arise through the use of contingent labour and third-party service providers in our operations, as well as through the complexity of our supply chain and suppliers whose goods or services go beyond our immediate visibility. To address these risks, our assessment focuses on three interconnected factors:

1. Geographical
2. Main economic activity/Industry Sector
3. Nature of goods and services

## Conceivable risks in our operations and communities

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

Whilst we recognise these risks, we consider that there is a lower modern slavery risk relating to our operations, particularly our workforce. This is largely due to our recruitment and supplier onboarding processes, our policies and our training practices. Additionally, all team members and suppliers have access to our Whistleblower Policy and platform, as well as an increased focus on group-wide risk management.

### Direct Employees

Given the majority of Direct Employees of Crown are based in Australia, we consider that there is a lower modern slavery risk relating to Direct Employees working within these higher risk industries. This is largely due to Australian employment standards, which are internally supported by our recruitment and onboarding processes, policies and procedures and our training practices.

### Indirect Employees – Contractors hired through labour hire companies

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. To address this risk, our labour hire companies are subject to our supplier risk assessment methodology which supports our ability to undertake a risk assessment of those entities during the onboarding process.

Additionally, all Direct and Indirect Employees have access to our internal grievance processes and Whistleblower Policy and platform to escalate any concerns.

## Conceivable risks in our supply chains

We procure goods and services across diverse sectors, categories and geographies, some of which are globally recognised as higher risk for modern slavery. Products such as textiles, garments, electronics, coffee, cacao, fish and seafood, palm oil and rice have been identified as products at risk of forced labour. These risks are amplified in Tier 2 and beyond, where visibility and traceability diminish significantly across complex value chains and geographies. The multi-tier nature of supply chains creates challenges in identifying and addressing these risks. To mitigate this, we have embedded systematic due diligence processes throughout our supplier lifecycle to assess, manage, and seek to effectively address these risks.

See Section 5 for a detailed description of how we assess our risks.

During this reporting period we have not identified any instances of modern slavery 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 strive to consider ways to strengthen the effectiveness of our modern slavery risk assessment approach and reporting to identify and address instances, or suspected instances, of modern slavery.

## Our Modern Slavery Risk factors

01

### Geographical exposure

Countries with higher levels of forced labour prevalence, elevated vulnerability scores and weaker labour laws, combined with systematic issues such as corruption, bribery and poor governance and accountability are considered higher-risk.

02

### Main Economic Activity / industry Sector

Sectors with higher inherent modern slavery risk have high reliance on low-skilled labour, subcontracting, and complex service delivery models. These industries often face fragmented supply chains and limited oversight, increasing vulnerability to exploitation.

03

### Nature of goods and services

Goods and services that involve complex value chain nodes and categories requiring intensive manual labour are considered higher risk due to challenges in tracing provenance, ensuring traceability, and maintaining trackability throughout the supply chain.



# 5. 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. We understand our modern slavery risk profile will change and evolve as we evolve and vary across those industries. 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

In specific support of our approach to managing our modern slavery risk, we have board-approved policies such as the Code of Conduct, Whistleblower Policy and Human Rights policy which are reviewed and updated periodically. These policies are supported by management approved policies such as the Procurement and Supply Chain Policy and Supplier Code of Conduct.

## Awareness training

We have delivered training to a dedicated core cohort of authorised personnel who enter into and approve contracts on behalf of Crown in addition to our procurement teams.

The training is designed to enhance awareness of the risks and practices that may amount to modern slavery in our operations and our supply chains.

## Risk assessment and supplier due diligence

We take a risk-based approach to identifying and assessing supplier risk which allows us to consider and assess our human rights risks and identify and reduce modern slavery risks we may face.

## Remediation and reporting

We are committed to remediation where we may have caused, or contributed to, or are directly linked to any harm as a result of our operations or supply chain. We are also committed to redress such harm in accordance with UNGPs guidance.

Respecting human rights is aligned with our efforts on anti-bribery and corruption, anti-money laundering and counter terrorism financing.

We have a Whistleblower Policy which is supported by a dedicated platform that our team members and suppliers can use to raise a Whistleblower Report. The Whistleblower Process is overseen by a Whistleblower Committee, with regular reporting to Crown Board Committees.

## Governing Policies

To support our framework in addressing our modern slavery risks within our operations and supply chains we have several Board and Management 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 Crown suppliers, their employees and family members.

### 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 a 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 they provide, 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

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. We aim to model good business practices, promoting a collaborative relationship where Crown and our suppliers work together to build a fair, professional and respectful business partnership.

## 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 build awareness of modern slavery within our teams. The key learning outcomes include helping our team members understand what modern slavery is, identifying risks in our operations and supply chains, and how to raise concerns.

During FY25, no changes were required to our existing modern slavery training module, as it remained aligned with current regulatory requirements. Throughout the year, we continued delivering the training to a broader audience across the group to enhance awareness of modern slavery risks. This audience includes staff who interact with suppliers, particularly those authorised to negotiate contracts on behalf of Crown, as well as members of the Procurement Team.

In addition to modern slavery training, all our team members were required to complete the following training modules via our dedicated learning platforms:

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

Our goal remains to ensure by the end of 2025 we have 100% of the training audience complete the modern slavery training.

## Modern Slavery Risk Assessment and Controls

Crown recognises that modern slavery presents an inherent risk within our operations and supply chains, particularly in relation to certain products, sectors and regions with vulnerable labour conditions and complex operations.

To mitigate these risks, Crown has implemented a range of controls, including supplier due diligence, onboarding assessment, and ongoing monitoring. These controls aim to identify and address potential modern slavery risks before and during supplier engagement.

While these measures are effective in reducing exposure, residual risk remains due to factors beyond Crown's direct control, such as complex subcontracting arrangements within our operations as well as complexity beyond our direct supply chains.

Crown continues to work collaboratively with internal stakeholders and suppliers to strengthen transparency, enhance risk assessment process, and drive continuous improvement in our overall risk assurance framework.

## Crown's Approach to assessing Modern Slavery Risk

### STAGE 1 - INHERENT MODERN SLAVERY RISK IDENTIFICATION

The purpose of the inherent risk identification is to establish a baseline risk profile prior to engaging with the supplier. This process is supported by Crown's supplier due diligence framework, which enables us to assess modern slavery risk in the following ways:

- All new suppliers must obtain endorsement from relevant business units before any commercial engagement. This step ensures adherence to policies, accountability, and compliance, while confirming that suppliers are informed of their obligations in advance.
- The onboarding process includes an assessment of sanctions, anti-bribery and corruption, disciplinary actions, law enforcements, watchlists, adverse media, politically exposed persons and modern slavery risks. These risks specifically cover forced and slaved labour, exploitation of children, human rights violations, and labour rights violation. This assessment is conducted during onboarding and on an ongoing basis for all current suppliers throughout their lifecycle.
- We utilise a supplier onboarding questionnaire for our Australian operations. This questionnaire is completed by a large cohort of suppliers based on the value of products and services being acquired. This provides transparency and insight into the suitability of our suppliers, including health and safety, human rights and environmental impacts. Prospective suppliers are requested 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 as well as adherence to our Supplier Code of Conduct.

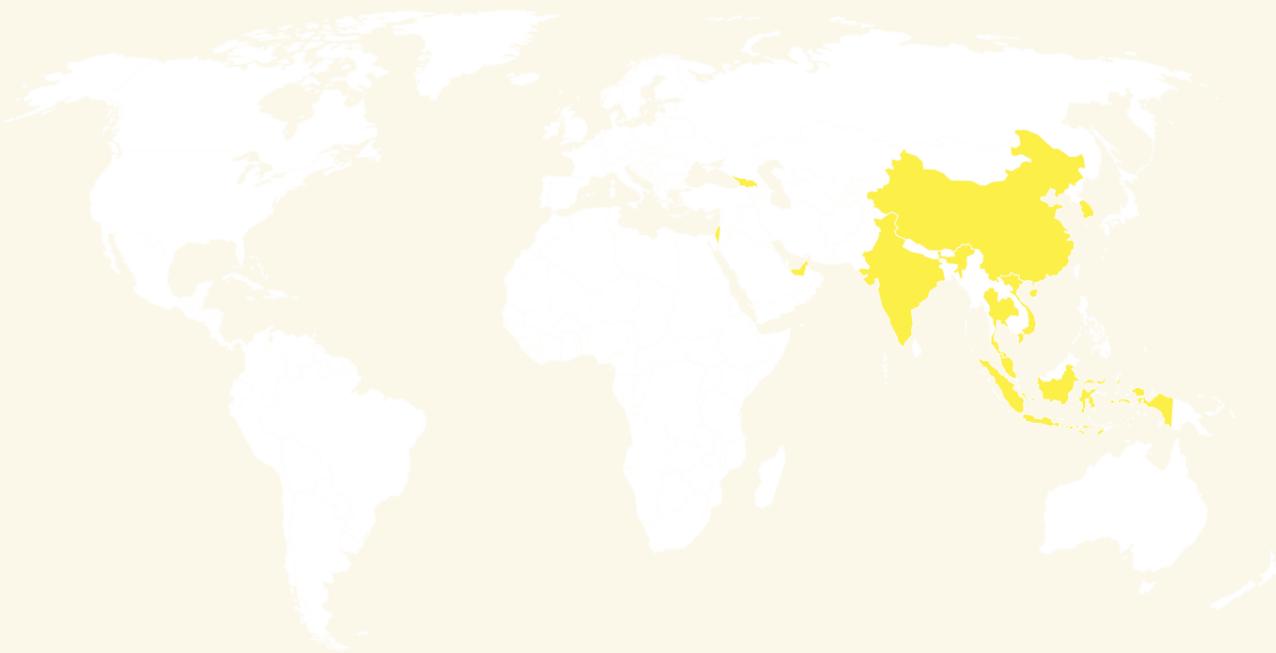
### STAGE 2: ENHANCED MODERN SLAVERY ASSESSMENT

The enhanced modern slavery assessment consists of assessing suppliers against the 3 Modern Slavery Risk Factors.

1. High risk Geographies
2. High risk economic activities / industry sectors
3. Goods and services that due to its nature are high risk

#### Factor 1: High risk geographies

Our methodology begins with geographic exposure, as structural conditions—prevalence of forced labour, population vulnerability, and government response—define where modern slavery risk is most acute. Guided by the Global Slavery Index, this factor directs assurance to jurisdictions where systemic weaknesses demand heightened oversight. The map shows the prioritized jurisdictions with the highest likelihood of modern slavery risk to Crown.



#### Factor 2: High risk economic activities / industry sectors

We use the ANZSIC classification to determine supplier industry categories and identify sectors with structural vulnerabilities such as high reliance on low-skilled labour, subcontracting, and complex service delivery models—where modern slavery risk is inherently higher.

#### Factor 3: Goods and services that due to its nature are high risk

Goods and services that sit within complex value chain nodes, where provenance, traceability, and trackability create significant challenges, pose a heightened risk of modern slavery. The layered structure and interdependencies across these nodes often limit visibility and accountability, increasing vulnerability to exploitation.

### STAGE 3: ASSURANCE EFFORTS

Assurance efforts are articulated across the three risk factors, each addressing a distinct dimension of modern slavery exposure while contributing to an integrated methodology that informs prioritisation and governance decisions through a composite risk rating. This cumulative methodology ensures that assurance actions are not applied in isolation but reflect the combined impact of geographic exposure, labour vulnerability, and the nature of goods and services.

#### Factor 1: Geographic Exposure:

The contribution and assurance efforts for this factor focus on scoping into the composite risk the jurisdictional realities of the international jurisdictions of the small proportion of our international suppliers, where weak governance, limited social safety nets, and high levels of inequality and marginalisation prevail, creating systemic risks where modern slavery can thrive. This approach provides assurance even for suppliers in sectors with strong safeguards or goods with high traceability, as systemic vulnerabilities shape the operating context beyond individual controls.

#### Factor 2: Economic activities / industry sectors:

The assurance and contribution intent of this factor is to embed sector-level risk into the composite, capturing governance and regulatory weaknesses (low safeguards, poor enforceability, lack of standards), structural complexity (fragmented supply chains, subcontracting), and labour vulnerabilities (rudimentary practices, low-skilled workforces, limited technological evolution). This ensures assurance, even for suppliers in low-risk jurisdictions or with highly traceable goods, as sector complexity can create systemic vulnerabilities beyond individual controls.

#### Factor 3: Nature of goods and services:

The assurance and contribution intent of this factor is to capture inherent vulnerabilities in high-risk product categories within the range of supplier products and services, ensuring systemic risks are addressed where supplier-level controls alone are insufficient. These include products under the agricultural category (cocoa, coffee, rice, palm oil), complex global manufacturing (garments, textiles, electronics), and high-risk fisheries. These products often involve complex value chains with multiple productive nodes, informal or remote operations, governance gaps, and exploitative practices such as debt bondage, hazardous child labour, and coercive recruitment. This approach provides assurance even for suppliers within low-risk jurisdictions or sectors with strong controls, as these structural characteristics create systemic vulnerabilities beyond individual oversight.

**Sense Check:** After establishing Crown's supplier modern slavery baseline, we apply a sense check against additional criteria and variables to determine the final set of suppliers for targeted review.

**Residual Risk:** For suppliers that continue to present residual risk despite existing controls, deeper governance is required to address the likelihood of modern slavery. These suppliers will undergo targeted engagement and, where necessary, remediation to strengthen their modern slavery controls and improve transparency across their supply chains.

## Remediation & Reporting

Crown has a dedicated remediation framework and documented process to follow should we receive a report, whether internally or from an external source, of a perceived or actual activity that may constitute 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 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.

#### 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 must communicate the Supplier Code of Conduct to their affiliated companies in which they have any ownership, financial interest, or control, and to their own suppliers and subcontractors involved in delivering goods or services to Crown, 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.

# 6. ASSESSING THE EFFECTIVENESS OF ACTIONS

Crown adopts 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 escalation processes that allow eligible whistleblowers to raise reports via our dedicated whistleblower platform.

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.

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

During this reporting period our three lines of defence have tracked the effectiveness of our actions in:

Crown's **1st Line** function by:

- reviewing our supplier due diligence process and associated policies
- reviewing and where appropriate enhancing training in key areas pertinent to modern slavery risks and then tracking the completion rates of such training.

Crown's **2nd line** function by:

- provided oversight and assurance on the Modern Slavery Statement to ensure factual accuracy of Crown's Modern Slavery Risk Assessment approach and accompanied reporting.

Crown's **3rd Line** function by:

- conducting an independent internal audit of the Procurement & Supply Chain risk controls, and due diligence process associated with modern slavery.

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 continue to be enhanced.



# 7. CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

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

- Audit and Finance Committee
- Board Risk, Compliance and PlaySafe Committee
- Betfair Board of Directors

Crown Melbourne, Crown Sydney and Crown Perth has its own Board and dedicated Audit and Finance Committees and Risk, Compliance and PlaySafe Committees.

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:

- targeted supplier due diligence
- discrete support services in relation to worker rights
- internal audits of various business unit operations, policies and processes
- dedicated training activities.

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 Compliance and Regulatory Affairs; Corporate Communications; Legal and our Finance teams.

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



# APPENDIX A

## Our 2025 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
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





Crown Resorts Limited ACN 125 709 953  
8 Whiteman Street, Southbank, VIC 3006