

2021 Modern Slavery Statement

Crown Resorts Limited ABN 39 125 709 953

Acknowledgment of Country

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







Chairman's Message

Crown Resorts is presenting its second Modern Slavery Statement for the reporting period 1 July 2020 through to 30 June 2021.

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

Since the first report, Crown has introduced a Group Human Rights Policy and implemented a modern slavery training program with our Procurement, Projects and Supply Chain staff completing the program in this reporting period. This training program will be expanded to other parts of our organisation over the coming year.

Crown has also renewed its purpose statement and values in 2021.

At Crown our purpose is simple.

Together, we create exceptional experiences with respect and care for our communities. Our purpose is underpinned by our four core values:

- WE ACT WITH INTEGRITY
- WE STRIVE FOR EXCELLENCE
- WE WORK TOGETHER
- WE CARE

As part of our commitment to our social licence and our reporting obligations, Crown is continuing to focus on building our awareness of modern slavery risk in our operations and supply chain and strengthening the capability of our organisation to identify, manage and report modern slavery risk.

This Statement has been approved by the Crown Board.

J. l. Switter undi Dr Ziggy Switkowski Chairman

Crown Resorts Limited

About this Statement

This is the second Modern Slavery Statement for Crown Group, covering Crown Groups activities over the financial year ending 30 June 2021 and has been prepared to comply with the Modern Slavery Act 2018 (Cth).

The reporting entity, Crown Resorts Limited, is a listed company with shares quoted on the Australian Securities Exchange. This joint statement covers Crown Resorts Limited and the following Crown Group reporting entities (together referred to as we, us, our, Group or Crown):

- Crown Resorts Limited
- Crown Entertainment Group Holdings Pty Ltd
- Crown Melbourne Limited
- Burswood Property Trust (Trustee: Burswood Nominees Limited)
- Crown (Western Australia) Pty Limited
- Burswood Limited
- Betfair Pty Ltd
- Betfair Australasia Pty Ltd (immediate parent of Betfair Pty Ltd)
- Jemtex Pty Ltd (immediate parent of Betfair Australasia Pty Ltd)
- Crown Asia Investments Pty Ltd (Revenue > \$100m, noting it is all intercompany revenue)
- Crown CCR Group Holdings One Pty Ltd (parent of Crown Asia Investments Pty Ltd)

This statement has been prepared to meet the mandatory criteria structure as outlined in the Act and the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

Consultation with owned and controlled entities

Crown is committed to ensuring that we standardise our approach to modern slavery across each of Crown Group's reporting entities. To drive consistency in awareness and a common approach to improving controls, a working group has been established that meets regularly, with the primary purpose to improve the identification, assessment and management of modern slavery risks as outlined in this Statement. The representative entities are those of where we have deemed heightened modern slavery risk could occur and currently represent various key internal departments such as Legal, Internal Control, Corporate Affairs, Procurement and Finance. The group is chaired by our Chief Risk Officer. As our approach to modern slavery matures, we envision the group will broaden to represent many internal business units such as People and Culture, Learning and Development and key frontline business units. Crown will continue to consult with these entities and will progressively enhance the risk assessments across these entities over future reporting periods.

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

Crown's Purpose and Values

At Crown our purpose is simple. Together, we create exceptional experiences with respect and care for our communities.

Our purpose is underpinned by our four core values:

- WE ACT WITH INTEGRITY
- WE STRIVE FOR EXCELLENCE
- WE WORK TOGETHER
- WE CARE

Our values mean that:

- We build authentic relationships with all our stakeholders to ensure that we not only uphold the laws that govern us, but are respected as a leader in our industry.
- We realise we are stronger when we work together.
 We actively champion diversity and inclusion, and seek out new thinking to drive our success as individuals and as a community.
- We go beyond exceptional customer service to demonstrate true customer care.
- We strive for excellence in everything we do.

Crown's Approach to Human Rights

Crown believes 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 International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

We acknowledge as one of Australia's largest hospitality providers we have an obligation to prevent and mitigate adverse human rights impacts in our operations and supply chain, and remediate when harm is caused.

Crown acknowledges its responsibility to identify and address modern slavery practices as defined in the Act. Crown also recognises that respect for human rights goes hand-in-hand with addressing with other enabling factors such as preventing bribery and corruption, complying with anti-money laundering and counter terrorism financing obligations and operating sustainably. The Crown board has approved a new Human Rights Policy that came into effect in September 2020 <u>https://www.crownresorts.com.au/corporate-</u> <u>governance/policies</u>

Furthering our commitment to identifying, addressing and mitigating modern slavery practices, numerous key deliverables were achieved in 2021.

Key achievements 2021

Furthering our commitment to identifying, addressing and mitigating modern slavery practices, numerous key deliverables were achieved in 2021.

Management of external Supplier relationships

Communication, support and contract extensions

The shutdowns across our three properties resulted in significant revenue and cash flow impacts to our operational suppliers. We remained in regular contact with all our key suppliers and where hardship or challenges existed, we looked to extend contract terms and review payment terms.

Improved Terms

In further improving supplier financial security, Crown also shortened standard payment terms for all Crown suppliers. The shortening of payment terms provides improved cash flows, which is as a key area where a company can help reduce the potential for modern slavery in the supply chain.

Improved Risk Management and Awareness

High Risk Supplier Analysis Tool

In conjunction with an external modern slavery adviser, Crown developed a High-Risk Supplier Analysis Tool in order for Crown to identify the potential risk of Modern Slavery in Crown's supply chain. The intention of the tool is to screen our suppliers through a set modern slavery decision criterion to determine who our high, medium and low risk suppliers are relative to modern slavery. The initial screen focused on suppliers where we spend greater than \$100,000 per annum across four key categories being food and beverage, cleaning and security services, textiles, including uniforms and linen, and building contractors and construction materials. These categories were identified as key areas where modern slavery risk is heightened. The results from the tool allowed Crown to undertake further due diligence with high-risk suppliers during the reporting period.

Modern Slavery Training

Crown purchased a Modern Slavery training module of which all Procurement/Projects and Supply Chain Staff were required to complete. The module is intended to create awareness to modern slavery risk and to identify measures to reduce the risk of modern slavery in the supply chain.

Internal Procedure Updates

During the reporting period, Crown updated Procurement tender documents, tender decision tools and contract precedents to ensure modern slavery risk considerations and/or assessments are completed prior to any recommendation or decision being implemented by Crown. The inclusion of modern slavery considerations into Crown's decision tools has made Modern Slavery a mandatory consideration prior to any award of business.

Human Rights Policy

During the reporting period, Crown implemented its Human Rights Policy.

The new policy was also embedded into Crown's operating and decision-making procedures and updated in contract precedents and Purchase Order Terms and Conditions.

Priorities 2022

Crown is committed to strengthening our practices in order to identify and remedy modern slavery in its supply chain.

To continue progressing this important work, Crown will undertake additional key actions in the FY22 reporting period.

Establish Crowns remediation policy and procedures

During the next reporting period, Crown will establish its remediation policy and procedures for an event where modern slavery is identified in its supply chain. Remediation plays a critical role in creating awareness and driving improvement in reducing modern slavery harm.

Expand our scope of Risk Assessment into Crown's Supply Chain

With the success of the High-Risk Tool Crown developed in FY21 through which suppliers that Crown spends in excess of \$100,000 per annum were assessed against modern slavery risk, we will look to broaden our scope of suppliers in the next reporting period to low-value, high-risk suppliers which will capture the bulk of our Tier 1 suppliers.

Audit Process Improvements

Crown is committing to improve its audit processes looking not only at first line (pre-contracting) but second line (proactive and periodic reviews) of our medium to high-risk vendors and have this form part of a broader supplier due diligence framework and risk assessment process.

Company-wide Training

Crown has also committed to develop its own internal Modern Slavery module to best align to Crown's business and business risk relative to Modern Slavery. This training will serve to extend our employee awareness of Modern Slavery in Crown's day to day operations.

Structure, Operations and Supply Chain

Structure

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

As at 30 June 2021, the Crown Group comprised approximately 61 owned and controlled companies. Further information on the Crown Group is included in Crown's 2021 Annual Report which is available at https://www.crownresorts.com.au/investors-andmedia/annual-reports

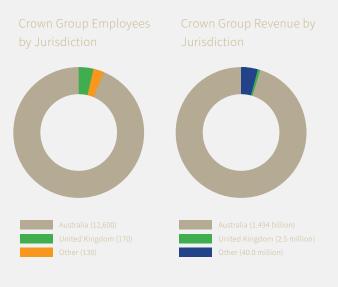
Each reporting entity, other than Crown, is a wholly owned subsidiary of Crown.

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

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

Operations

Crown is one of Australia's largest entertainment groups with its core businesses and investments in the integrated resorts sector. Crown makes a major contribution to the Australian economy through its role in tourism, employment and training and through its corporate responsibility programs. In Australia, Crown owns and operates three of Australia's leading integrated resorts – Crown Melbourne, Crown Perth and Crown Sydney. As one of Australia's largest hospitality and tourism employers, Crown Melbourne and Crown Perth are the largest single-site private sector employers in both Victoria and Western Australia respectively.



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.

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

Overseas, Crown owns and operates Crown Aspinalls in London, one of the high-end licensed casinos in the West End entertainment district. At the end of the reporting period, Crown Aspinalls had approximately 170 employees located in London. Crown's wagering and online social gaming operations comprises Betfair Australasia, a 100% owned online betting exchange, and DGN Games; an 100% owned online social gaming business and DGN Games approximately 30 employees located across Israel and the United States.

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

Crown Perth is one of Western Australia's largest tourist destinations, featuring three hotels, world-

class convention and gaming facilities, restaurants and bars, a 2,300-seat theatre, and shopping and entertainment facilities.

During the reporting period, Crown completed and opened Crown Sydney Hotel Resort in Barangaroo. The Crown Sydney Hotel Resort, which opened on 28 December 2020, is Sydney's first six- star hotel featuring 349 hotel rooms and suites, luxury residences, signature restaurants, bars, luxury retail outlets, pool and spa facilities and conference rooms.

Crown's other interests include the following:

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

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

More information

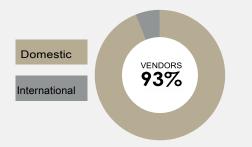
For more information on Crown's business operations and strategies is available at <u>https://www.crownresorts.</u> com.au/investors-and-media/annual-reports



Crown owned and controlled operations

Supply Chain

During the reporting period, Crown's Australian owned and controlled operations procured approximately \$1.0 billion of goods and services from approximately 4,750 direct suppliers (the entities we contract with directly). The total spend during the reporting period was impacted by the reduced operating conditions at Crown's properties as a result of COVID-19. In comparing to the prior reporting period, whilst our overall spend on suppliers decreased due to property shutdowns during the period, there was no material change in our spend allocation on Australian local suppliers and spend allocation by category for Crown's Australian-owned and controlled operations.



Approximately 96% of total spend from Crown's Australian owned and controlled operations during the reporting period was with direct Tier 1 (suppliers we procure from directly) suppliers located in Australia.

We acknowledge that our direct suppliers may have operations in, or may source goods or services from, jurisdictions which may have a higher risk for modern slavery.

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

Risks of Modern Slavery in the Operations and Supply Chain

Modern Slavery

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

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

Modern Slavery Risk Factors

The key modern slavery risk factors are categorised as follows:

- vulnerable populations groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. The level of worker vulnerability, and risk of poor labour practices and exploitation are recognised to be higher in contexts where base skill labour is relied upon.
- high risk categories products and services regarded as having more significant inherent modern slavery risk- including industries that rely heavily on low-skilled labour and/or involve dirty, dangerous and difficult work.

- high risk geographies countries or regions which are known to have higher human rights (and modern slavery) risks. High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance.
- high risk business models business models that rely on third parties for the provision of services often labour hire. Outsourcing reduces company visibility over third-party recruitment practices and provision of worker entitlements.

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

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

Risk Identification Process

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

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

During the reporting period, Crown identified that the modern slavery risks associated with its supply chain are more significant than those associated with its operations.

This is in large part due to the vast majority of Crown's employees being based in Australia with employment arrangements regulated by the Fair Work Act (Cth) and relevant modern awards.

Supply Chain Risks

Unfortunately, at this point in time, no global supply chain is free of modern slavery. Following completion of the risk identification processes, Crown identified the following key modern slavery risk categories within its global supply chain:

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

Supplier Data Analytics Tool

Following from the first Statement, Crown in conjunction with an external specialist human rights and impact adviser, implemented a supplier modern slavery risk assessment data analytics tool. The data analytics tool was used by Crown to identify high risk onboarded suppliers based on the following four risk factors:

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

In FY21, Crown commenced the process to assess high risk suppliers, based on the four risk factors and in the above categories. This initial assessment is expected to be concluded in the early parts of FY22 with ongoing annual reviews.

The assessment process specifically identifies suppliers' risk of potential exposure to modern slavery and re-evaluates their risk rating in accordance with the following criteria:

- Supplier Modern Slavery Statement
- Member of a Self-Monitoring Organisation
- Supplier Enterprise Bargaining Agreement status
- Contracted under Crown's Terms & Conditions
- Completed Supplier Profile and answered Anti-Money Laundering & Modern Slavery Questionnaire
- Part of Crown's Supplier Relationship Management Programme
- Risk Software screening and continued monitoring of suppliers reporting with regards to Modern Slavery & Human Rights issues.
- Obtained Acknowledgement and understanding from Crown's identified high risk suppliers of Crown's Supplier Code of Conduct and the Human Right and Modern Slavery additions.

Supplier Qualification Process

Since 2017, Crown has implemented a supplier onboarding questionnaire for its Australian operations which captures the vast majority of Crown's suppliers and provides Crown with transparency and insight about the sustainability of its suppliers, including health and safety, human rights and environmental impacts.

Suppliers are required to complete a detailed questionnaire as part of Crown's supplier prequalification and risk assessment processes.

During the reporting period, the onboarding questionnaire for our suppliers was strengthened to include specific modern slavery questions. Following on from the conclusion of the reporting period, prospective and new suppliers are required to complete the modern slavery questions.

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

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

Other Risks

Crown recognises that its casinos may be vulnerable to money laundering and that money laundering may be a risk indicator for modern slavery practices and will consider this intersection of risk as part of its Anti-Money Laundering / Counter-Terrorism Financing program of work.

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

Reporting Entity Actions

Governance Structure

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

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

- Audit and Corporate Governance Committee
- People, Remuneration and Nomination Committee
- Safety and Sustainability Committee
- Responsible Gaming Committee
- Risk Management Committee

Modern Slavery Program of Work

Following the enactment of the Modern Slavery Act 2018 (Cth), Crown continued its programme of work to identify modern slavery risks. The program of work includes a long-term plan to deliver strengthened processes and continuous improvement to internal processes to prepare for identification, remediation reporting annually of outcomes under the Act.

A working group comprised of representatives from Legal, Procurement, Risk, Corporate Affairs, Internal Audit, Sustainability and Betfair, chaired by the Chief Risk Officer, continued to oversee the modern slavery program of work. During the reporting period, this work was overseen by Crown's Risk Management Committee of the Board.

Policies Human Rights Policy

During the reporting period, Crown undertook a review, with the support of independent human rights subject matter experts, to understand its salient human rights issues. Through this review, Crown identified four human rights issues where Crown believes it can mitigate risks, prevent harm or support better outcomes for its stakeholders. Recognising Crown's responsibility to respect all human rights, the particular areas identified are: labour rights, health and safety, equality and discrimination and Indigenous rights.

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

More information

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

Code of Conduct

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

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

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

More information

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

Supplier Code of Conduct

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

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

During the reporting period, the Supplier Code of Conduct was updated to strengthen its alignment with the Act and to refer to Crown's Whistleblower Policy which applies to suppliers and their employees. This was communicated to all suppliers in Crown's database in August 2020.

More information

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

Whistleblower Policy

Crown's 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:

- the disclosures which qualify for protection;
- how disclosures can be made and to whom;
- the process for investigating disclosures; and
- 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. Eligible whistleblowers are encouraged to contact STOPLine to make a disclosure under this Policy. STOPLine is an independent and confidential service which is available 24 hours a day, seven days a week.

More information

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

Code of Conduct

Procurement & Supply Chain Employees Training and Awareness

During the reporting period, Crown rolled out training and awareness of modern slavery. All Procurement, Key Supply Chain and Projects, have completed the training.

Supply Chain Management Sustainable Supply Chain

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

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

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

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

Supplier Qualification Process

Since 2017, Crown has implemented a supplier onboarding questionnaire for its Australian operations, which captures the vast majority of Crown's suppliers and provides Crown with transparency and insight about the sustainability of its suppliers, including health and safety, human rights and environmental impacts. Suppliers are required to complete a detailed questionnaire as part of Crown's supplier pre-qualification and risk assessment processes. During the reporting period, the onboarding questionnaire was strengthened to include specific modern slavery questions. During the reporting period, prospective and new suppliers were required to complete the modern slavery questions. In the next reporting period, there is an extended programme of work already to have high risk existing suppliers fill out the questionnaire.

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

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

Supplier Forums

Crown typically holds supplier forums twice yearly for our key operational suppliers (high business impact or value). Following the introduction of the Act, a number of these forums were used by Crown to raise awareness of modern slavery amongst these key suppliers. Due to COVID-19 restrictions we were unable to hold these during the period however will be re-instating these as either an in-person or hybrid (in-person/ online) meeting for the next reporting period.

Supplier Relationship Management

During the reporting period, Crown held a reduced number of supplier relationship management meetings due to the impact of COVID-19 shutdowns, on either a quarterly or biannual basis with approximately 10 of its service providers, including cleaning service providers. Those suppliers are required to complete a scorecard which includes criteria on compliance with labour laws and subcontracting arrangements.

Supplier Contracts and Purchase Order Terms and Conditions

During the reporting period, Crown added Crown's Human Rights Policy in its supply contracts and purchase order terms and conditions which requires compliance with the Act and notification of any identified instances of modern slavery in its operations and supply chain.

Procurement Documents

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

Assessing the Effectiveness of Actions

Crown acknowledges that, in the second reporting period that was impacted by COVID-19 shutdowns and closures it was in the early stages of understanding its exposure to potential modern slavery risks and to raise awareness of modern slavery.

Following the commencement of the Act, Crown engaged an external specialist human rights and impact adviser to undertake a modern slavery readiness assessment to determine the maturity of Crown's approach to managing operational and supply chain modern slavery risks, informed by and aligned with the UN Guiding Principles on Business and Human Rights and other relevant international frameworks. A roadmap was then developed to enhance Crown's maturity and during the reporting period Crown continued to implement the recommended actions of the Roadmap. Crown's Risk Management Committee of the Board monitors disclosures made under Crown's Whistleblower Policy. No instances of modern slavery were identified through this service during the reporting period. We recognise that this does not mean that no instances of modern slavery existed in our operations or supply chain and will consider ways to strengthen the effectiveness of reporting instances, or suspected instances, of modern slavery.

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



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