

# **Special Manager's Interim Report June 2022**

## **Appendices**

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## Appendix A: The OSM work plan for the period 1 July to 31 December 2022

The table below summarises the OSM’s work plan for the period 1 July 2022 to 31 December 2022. It has been developed having regard to recommendations made and issues identified in the Finkelstein Report and Crown’s current draft MRAP dated 10 June 2022.

Each of the work streams, priority areas of focus and assessment relate to specific requirements set out in Appendix I of the Finkelstein Report and/or the Special Manager’s monitoring of current operations, as summarised below.

The work plan is current as at 30 June 2022, and will evolve as Crown moves through the design, implement and embed phases of its reform activities.

Work stream	Relevant Appendix I requirements
<b>1 Transformation</b>	All Appendix I 3 (a) Risk management – root cause analysis
<b>2 Culture</b>	4 Culture
<b>3 Risk, governance and compliance</b>	1 (a–d) General requirements 3 (b–c) Risk management 18 Compliance with statutory and contractual obligations
<b>4 Responsible service of gambling</b>	17 (a–g) Responsible service of gambling
<b>5 Financial crime</b>	5 (a–g) External report recommendations 6–8 McGrathNicol Report 9–10 Crown’s Financial Crime and Compliance Change Program 11 Other external expert work 12–13 Resourcing 14–16 AML/CTF Program

## Work stream 1: Transformation

	Priority areas of focus	Reference	Phase	Assessment focus
1.1	Root cause analysis	Appendix I – 3 (a)	Design	<ul style="list-style-type: none"> <li>Assess Crown’s phase 1 root cause analysis into Crown Melbourne’s failures</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess Crown’s phase 2 root cause analysis validation of initial hypotheses</li> </ul>
1.2	Transformation program	All Appendix I	Ongoing	<ul style="list-style-type: none"> <li>Monitor the development of a transformation program that addresses relevant findings and recommendations applicable to Crown Melbourne in a manner that is coordinated, integrated and prioritised to achieve outcomes</li> </ul>
1.3	IT uplift	All Appendix I	Ongoing	<ul style="list-style-type: none"> <li>Monitor progress with the five core IT capability uplift programs:                             <ul style="list-style-type: none"> <li>Casino Management Uplift (CMS)</li> <li>Systems Consolidation Program</li> <li>Cyber Security</li> <li>IT Uplift Program</li> <li>Modular Business Services</li> </ul> </li> </ul>

## Work stream 2: Culture

### 2.1 Commitment to Group transformation and Culture Reform programs

	Priority areas of focus	Reference	Phase	Assessment focus
2.1.1	New leadership commitment to Culture Reform Program	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Assess Crown’s ongoing commitment to the Culture Reform Program in light of the Blackstone Inc. acquisition</li> <li>Review ongoing resourcing and prioritisation of the Culture Reform Program</li> </ul>
2.1.2	Governance structure	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Assess whether the governance structure of the Culture Reform Program is adequate to successfully deliver the program</li> <li>Assess whether the governance structure of the Culture Reform Program is integrated into the Group transformation program</li> </ul>



	Priority areas of focus	Reference	Phase	Assessment focus
2.1.3	<b>Addressing the root cause analysis and Finkelstein Report findings</b>	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Review Crown’s root cause analysis</li> <li>Review findings from Crown and the Finkelstein Report that are specific to Crown Melbourne</li> <li>Assess the degree to which the Culture Reform Program addresses the issues raised in the root cause analysis and the Finkelstein Report</li> </ul>
2.1.4	<b>Support for other Crown work streams</b>	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Assess how the Culture Reform Program supports the other Crown work streams, including financial crime and RSG</li> <li>Review the methodology for bringing a people and customer-focused lens to the relevant parts of the MRAP</li> <li>Review the methodology for embedding psychological safety across all levels of the business</li> <li>Review the methodology of the Culture Reform Program to ensure it embeds the reformed ways of working at all levels, with particular attention to the vital middle management level</li> </ul>

## 2.2 Reaching middle management

	Priority areas of focus	Reference	Phase	Assessment focus
2.2.1	<b>Methodology for reaching middle management</b>	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Assess Crown’s methodology for ensuring the Culture Reform Program reaches the middle management/supervisor level and is translated to real change ‘on the gaming floor’</li> </ul>
2.2.2	<b>Evaluate ‘completed’ activities</b>	Appendix I – 4	Implement	<ul style="list-style-type: none"> <li>Identify and select specific activities that have been completed, based on impact on middle management, embedding psychological safety, high-risk areas and alignment with other work streams</li> <li>Develop evaluation methodologies to assess the effectiveness of the selected activities using the above criteria (which can also be used for future activities)</li> <li>Provide feedback on the degree to which the selected activities were successful in reaching the middle management cohort</li> </ul>

## 2.3 Monitoring ongoing and future activities

	Priority areas of focus	Reference	Phase	Assessment focus
2.3.1	<b>Crown's forward plan</b>	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Monitor upcoming activities of the Culture Reform Program to ensure they are aligned with the Group transformation program and Crown's own schedule</li> <li>Identify and select upcoming activities based on impact on middle management, embedding psychological safety, high-risk areas and alignment with other work streams</li> <li>Be adaptable to changing priorities and sequencing within Crown, especially following the Blackstone Inc. acquisition</li> </ul>
2.3.2	<b>Culture change network</b>	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Monitor the implementation of the culture change network, including Crown's evaluation of success and responsiveness to feedback from evaluation</li> <li>Review the acceptance of the network by the middle management cohort</li> </ul>
2.3.3	<b>Second culture survey</b>	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Monitor the design of the second culture survey, with reference to the first culture survey and Crown's ability to track changes in its culture</li> <li>Ensure Crown has aligned the second culture survey to issues identified in Crown Melbourne</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Monitor the implementation and outcomes of the second culture survey</li> <li>Review Crown's response to the results of the second culture survey and how it uses the findings to inform ongoing activities in the Culture Reform Program</li> </ul>
2.3.4	<b>Risk and compliance culture and capability</b>	Appendix I – 4	Design	<ul style="list-style-type: none"> <li>Monitor the design of activities to strengthen risk and compliance culture and capability</li> <li>Assess Crown's alignment of strengthening activities with work undertaken in the risk, Compliance and Governance work stream</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Monitor the implementation of the activities to strengthen risk and compliance culture and capability</li> <li>Review the implementation activities to ensure they are aligned to the activities in the risk, compliance and governance work stream</li> </ul>

## Work stream 3: Risk, governance and compliance

### 3.1 Risk management

	Priority areas of focus	Reference	Phase	Assessment focus
3.1.1	<b>Risk management function</b>	Current operations	Ongoing	<ul style="list-style-type: none"> <li>Assess and review structure and resourcing of new risk management team</li> <li>Observe Crown Resorts and Crown Melbourne Audit and Risk Committees, including reported information and consideration of risk</li> <li>Monitor updates to risk assessments</li> </ul>
3.1.2	<b>Risk Uplift Plan</b>	Current operations	Implement	<ul style="list-style-type: none"> <li>Monitor implementation of Risk Uplift Plan (including amended implementation timelines)</li> </ul>
3.1.3	<b>Risk management frameworks and systems</b>	Appendix I – 3 (b)	Implement	<ul style="list-style-type: none"> <li>Verify implementation of the 21 Deans Report recommended changes to risk management frameworks (including Risk Charter, Risk Management Strategy and Risk Appetite Statement)</li> </ul>
3.1.4	<b>External review</b>	Appendix I – 3 (c)	Design	<ul style="list-style-type: none"> <li>Assess scope, approach and timing of independent external review of risk management</li> </ul>

### 3.2 Governance

	Priority areas of focus	Reference	Phase	Assessment focus
3.2.1	<b>Board independence</b>	Current operations	Ongoing	<ul style="list-style-type: none"> <li>Monitor Board independence, membership and skill</li> </ul>
3.2.2	<b>Centralisation of functions</b>	Current operations	Ongoing	<ul style="list-style-type: none"> <li>Assess adequacy of Crown Melbourne oversight of operations, given centralised approach led by Crown Resorts</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
3.2.3	<b>Board and committees</b>	Current operations	Ongoing	<ul style="list-style-type: none"> <li>• Verify changes to committee structure</li> <li>• Review updated charters, frameworks and reporting structures, including for changes recommended in the Deans Report</li> <li>• Confirm specific roles and responsibilities of subsidiary boards in relation to risk management</li> <li>• Monitor the effectiveness of Board and committee decision making, risk oversight and reporting</li> </ul>
3.2.4	<b>Policy Uplift Plan</b>	Appendix I – 18	Design	<ul style="list-style-type: none"> <li>• Confirm completion of phase 1 rationalisation and redraft of group policies</li> </ul>

### 3.3 Internal audit

	Priority areas of focus	Reference	Phase	Assessment focus
3.3.1	<b>Internal audit practice</b>	Current operations	Ongoing	<ul style="list-style-type: none"> <li>• Assess amended Crown Resorts and Crown Melbourne Audit Committee charters</li> <li>• Review appropriateness of internal audit program</li> <li>• Assess resourcing and delivery of internal audit program</li> <li>• Assess feedback and information sharing protocols with FC&amp;C Assurance</li> <li>• Assess clarity of internal audit reporting and reporting lines</li> </ul>

### 3.4 Compliance

	Priority areas of focus	Reference	Phase	Assessment focus
3.4.1	<b>Compliance systems and processes</b>	Appendix I – 18	Design	<ul style="list-style-type: none"> <li>• Monitor development and design of revised compliance systems and processes</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
3.4.2	<b>Engagement with regulators</b>	Appendix I – 18	Ongoing	<ul style="list-style-type: none"> <li>Monitor Crown’s proactive engagement with regulators</li> </ul>
3.4.3	<b>Compliance with legislative obligations</b>	Appendix I – 18	Design	<ul style="list-style-type: none"> <li>Assess Crown’s breach reporting protocol, draft breach reporting policy and escalation procedures</li> </ul>
			Ongoing	<ul style="list-style-type: none"> <li>Review records of compliance breach reporting</li> <li>Engage with and gather regulator records of identified non-compliance</li> </ul>
3.4.4	<b>Compliance with Crown Resorts and Crown Melbourne policies</b>	Appendix I – 18	Ongoing	<ul style="list-style-type: none"> <li>Review internal audit reports</li> <li>Monitor compliance breach reporting</li> </ul>
3.4.5	<b>Compliance with casino taxation obligations</b>	Appendix I – 18	Ongoing	<ul style="list-style-type: none"> <li>Monitor Crown Melbourne’s resolution of outstanding casino tax obligations related to Bonus Jackpots, Pokie Credits (Matchplay), tournament fees, new product gaming tax and player program review</li> <li>Monitor ongoing compliance with casino tax obligations, including claiming of deductions</li> </ul>
3.4.6	<b>Compliance with Casino Agreement obligations</b>	Appendix I – 18	Ongoing	<ul style="list-style-type: none"> <li>Monitor any impacts of Crown’s Barangaroo licence on Crown Melbourne</li> <li>Liaise with the VGCCC should any issues of concern arise</li> </ul>
3.4.7	<b>Integrity policies and procedures</b>	Appendix I – 18	Ongoing	<ul style="list-style-type: none"> <li>Review Crown’s code of conduct (as revised by Crown)</li> <li>Assess effectiveness of Crown’s policies and procedures for managing integrity (including related to fraud, corrupt conduct, misconduct, whistleblowers and complaints)</li> <li>Monitor training and communications in relation to integrity policies and procedures</li> <li>Assess effectiveness of Crown’s approach to managing integrity issues (including processes for investigating, reporting and addressing integrity issues)</li> </ul>



## Work stream 4: Responsible service of gambling

### 4.1 Responsible service of gambling (RSG) strategy and governance

	Priority areas of focus	Reference	Phase	Assessment focus
4.1.1	<b>Strategy and change plan (RGCP and MRAP)</b>	Current operations	Design	<ul style="list-style-type: none"> <li>Monitor development of Crown's Responsible Gaming Change Program (RGCP) including broader strategy</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Review progress with implementation of approved RGCP and MRAP initiatives</li> </ul>
4.1.2	<b>RSG governance</b>	Current operations	Ongoing	<ul style="list-style-type: none"> <li>Assess clarity of role and responsibilities of Crown Resorts' Responsible Gaming Board Committee and Crown Melbourne's Responsible Gaming Management Committee</li> <li>Monitor Crown Resorts' Responsible Gaming Board Committee and Crown Melbourne's Responsible Gaming Management Committee</li> <li>Monitor timely and accurate reporting of progress on responsible gaming activities</li> <li>Assess role and composition of Crown's Responsible Gaming Advisory Panel (RGAP)</li> </ul>
4.1.3	<b>Responsible Gaming Code of Conduct</b>	Appendix I – 17 (g)	Design	<ul style="list-style-type: none"> <li>Assess proposed changes to Crown's Responsible Gaming Code of Conduct</li> </ul>

### 4.2 Responsible service of gambling (RSG) staffing, training and effectiveness\*

	Priority areas of focus	Reference	Phase	Assessment focus
4.2.1	<b>RSG resourcing</b>	Appendix I – 17 (b–d) and 17 (f)	Design	<ul style="list-style-type: none"> <li>Assess adequacy of resourcing plan, including staff numbers, capability, allocation to tasks, remuneration and incentives</li> <li>Assess adequacy of funding for responsible gaming business as usual activities (RGCP to be assessed separately at 4.1.1)</li> <li>Assess development of responsible gaming KPIs for Line 1/2/3 employees</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
			Implement	<ul style="list-style-type: none"> <li>Verify the timely recruitment and onboarding of new responsible gaming staff</li> <li>Assess implementation of responsible gaming KPIs for Line 1/2/3 employees</li> <li>Assess recruitment of responsible gaming staff with relevant diverse backgrounds (including CALD communities)</li> </ul>
4.2.2	<b>RSG training</b>	Appendix I – 17 (a)	Design	<ul style="list-style-type: none"> <li>Assess Crown's enhanced responsible gaming training, policy and procedures</li> <li>Assess proposed responsible gaming staff training enhancements for Crown Melbourne</li> <li>Assess review of adequacy of Crown's existing responsible gaming training for staff not working in the responsible gaming area</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Verify delivery of training and completion of training by relevant staff cohorts (Board, senior management, responsible gaming staff and others)</li> </ul>
4.2.3	<b>RSG service effectiveness</b>	Appendix I – 17 (d)	Design	<ul style="list-style-type: none"> <li>Assess Crown's selection of Customer Relationship Management platform to be used</li> <li>Preliminary assessment of effectiveness of Crown's Responsible Gaming Advisors</li> </ul>

#### 4.3 Responsible service of gambling (RSG) communications

	Priority areas of focus	Reference	Phase	Assessment focus
4.3.1	<b>RSG communications</b>	Appendix I – 17 (d)	Design	<ul style="list-style-type: none"> <li>Assess Crown's gambling harm minimisation communications program across customer cohorts</li> <li>Assess Crown's responsible gaming employee communications program</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Verify timely delivery of gambling harm minimisation communications program across customer cohorts</li> <li>Verify timely delivery of responsible gaming employee communications program</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
4.3.2	Website content	Appendix I – 17 (d)	Design	<ul style="list-style-type: none"> <li>Review design, approach and proposed messaging of new responsible gaming website content</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Verify launch of new website content</li> </ul>
4.3.3	Messaging on EGMs/ETMs/ATMs	Appendix I – 17 (d)	Design	<ul style="list-style-type: none"> <li>Assess Crown’s review of messaging on electronic gaming machines/electronic table games/automatic teller machines and alternative channels</li> </ul>

#### 4.4 Player controls\*

	Priority areas of focus	Reference	Phase	Assessment focus
4.4.1	Exclusions	Appendix I – 17 (e)	Design	<ul style="list-style-type: none"> <li>Review Crown’s assessment relating to monitoring exclusions and proposed approach across Crown property locations (self and third party)</li> <li>Assess approach to investigating channel options for engaging with all exclusion programs, including digital processes</li> <li>Review Crown’s development of a statewide exclusion register</li> </ul>
4.4.2	Play periods	Appendix I – 17 (g)	Design	<ul style="list-style-type: none"> <li>Assess amended Play Periods Policy for international players, and updated play period communications</li> <li>Review consolidated play period research and data analytics</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess design and implementation of Play Periods Policy for domestic players, and updated play period communications</li> <li>Assess updated training on amended Play Periods Policy</li> </ul>
4.4.3	Carded/uncarded play	Appendix I – 17 (f)	Design	<ul style="list-style-type: none"> <li>Review initial output from Focal Research on monitoring uncarded play</li> <li>Review Crown’s identification of gambling-related harm risk assessment tools</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess implementation of effective risk assessment tools for gambling-related harm, including application of observable signs research</li> </ul>



#### 4.5 Crown Rewards Loyalty Program\*

	Priority areas of focus	Reference	Phase	Assessment focus
4.5.1	<b>Crown Rewards Loyalty Program</b>	Appendix I – 17 (f)	Design	<ul style="list-style-type: none"> <li>Assess scope of and approach to review of Crown Rewards Loyalty Program</li> </ul>
4.5.2	<b>Crown Rewards Members Bingo</b>	Appendix I – 17 (f)	Implement	<ul style="list-style-type: none"> <li>Confirm cessation of Crown Rewards Members Bingo</li> </ul>
4.5.3	<b>Crown Bus/Red Carpet Program</b>	Appendix I – 17 (f)	Implement	<ul style="list-style-type: none"> <li>Confirm cessation of Crown Melbourne Red Carpet Program, including provision of transport/buses for travel to Crown Melbourne and food and beverages to participants and funds towards bus hire</li> </ul>
4.5.4	<b>Crown Rewards promotional gaming vouchers</b>	Appendix I – 17 (f)	Implement	<ul style="list-style-type: none"> <li>Confirm cessation of Crown Rewards promotional gaming vouchers</li> <li>Assess replacement with non-gambling/promotional vouchers</li> </ul>
4.5.5	<b>Member benefit controls</b>	Appendix I – 17 (f)	Design	<ul style="list-style-type: none"> <li>Review approach to members receiving benefits, and assess controls put in place related to how members receive benefits</li> <li>Review updated marketing and promotion materials</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess rollout of updated gambling marketing and promotions material</li> </ul>

#### 4.6 Referral and support networks

	Priority areas of focus	Reference	Phase	Assessment focus
4.6.1	<b>Referral processes and networks</b>	Appendix I – 17 (d)	Design	<ul style="list-style-type: none"> <li>Assess Crown's review of adequacy of current referral processes into treatment and support</li> <li>Assess Crown's review of adequacy of current referral networks</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
4.6.2	Translator services	Appendix I – 17 (d)	Design	<ul style="list-style-type: none"> <li>Assess Crown’s plan to enhance translator services</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess implementation of recommended translator services enhancements</li> </ul>

#### 4.7 Data, research and evaluation

	Priority areas of focus	Reference	Phase	Assessment focus
4.7.1	Uplift RSG reporting	Appendix I – 17 (d)	Design	<ul style="list-style-type: none"> <li>Review new responsible gaming reporting metrics, reporting formats and information</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess implementation of enhanced reporting, including dashboards and metrics</li> </ul>
4.7.2	Framework for assessing RSG outcomes	Current operations	Design	<ul style="list-style-type: none"> <li>Develop OSM’s framework to evaluate effectiveness of Crown’s RSG activities in future reporting periods, including the methodology for a qualitative assessment of outcomes and benefits to customers and other stakeholders</li> </ul>

### Work stream 5: Financial crime

#### 5.1 Risk assessment

	Priority areas of focus	Reference	Phase	Assessment focus
5.1.1	Enterprise-Wide Risk Assessment (EWRA)	Appendix I – 5 and 11 (c)	Design	<ul style="list-style-type: none"> <li>Review EWRA methodology to verify that recommendations from the external reports are included/updated</li> <li>Review Crown’s current library of ML/TF risks, red flags and typologies</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Ascertain Crown’s current progress with the revision of the EWRA methodology, including the timeframe for completion</li> <li>Ascertain Crown’s plans for refresh of EWRA in the second half of 2022</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
5.1.2	<b>Customer risk assessments (CRAs), jurisdiction risk assessments (JRAs), channel risk assessments (ChRAs) and product risk assessments (PRAs)</b>	Appendix I – 5 and 11 (c)	Design	<ul style="list-style-type: none"> <li>Review updated methodologies and policies to verify recommendations from external reports reflected</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Verify and assess the alignment of CRA to ML/TF risks identified in EWRA</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Verify and test a sample of customer files as part of the Know Your Customer (KYC) refresh to ensure KYC and CRA processes are effective</li> <li>Verify by way of sample data testing the effectiveness of JRA, ChRA and PRA</li> </ul>
5.1.3	<b>Crown patron accounts</b>	Appendix I – 5 (d)	Design	<ul style="list-style-type: none"> <li>Ascertain Crown’s current progress or results of its review of patron accounts with ANZ</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Review risk assessments and assurance reviews regarding patron account controls</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Verify and test a sample of patron account controls</li> </ul>
5.1.4	<b>Process and controls improvement</b>	Appendix I – 5 and 11 (c)	Implement	<ul style="list-style-type: none"> <li>Assess updates/enhancements of controls to address issues and risks identified in external reports and EWRA</li> </ul>
5.1.5	<b>Risk Appetite Statements</b>	Appendix I – 5	Implement	<ul style="list-style-type: none"> <li>Ascertain Crown’s current progress regarding the development of a more robust Risk Appetite Statement for ML/TF risk, including qualitative factors</li> </ul>

## 5.2 Applicable customer identification procedures

	Priority areas of focus	Reference	Phase	Assessment focus
5.2.1	<b>Customer risk assessment</b>	Appendix I – 5 and 11 (c)	Design	<ul style="list-style-type: none"> <li>Assess whether Crown has implemented recommendations from external reports</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
5.2.2	<b>Verification of information</b>	Appendix I – 14, 15 and 16	Design	<ul style="list-style-type: none"> <li>Ascertain Crown’s current progress regarding its new KYC technology, in particular digital verification (eDVS)</li> <li>Review Crown’s AML/CTF Program Part B following finalisation of the technology build to take account of the new KYC process</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess whether Crown has implemented recommendations from external reports regarding customer identification (including eDVS)</li> </ul>
5.2.3	<b>Lookback of existing customers</b>	Appendix I – 5 (a)	Design	<ul style="list-style-type: none"> <li>Ascertain whether Crown intends to undertake an identity resolution assessment of the membership database (dormant and active accounts) to consolidate duplicate memberships and identify potential past use of fake identification by existing members</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Verify and test a sample of customer files to ensure customer identification processes are being complied with (such as capturing the appropriate customer information and supporting documentation provided by the customer)</li> </ul>
5.2.4	<b>Policies and procedures</b>	Appendix I – 5 (b)	Design	<ul style="list-style-type: none"> <li>Ascertain whether Crown intends to address the recommendations from Promontory’s Phase 2 Report</li> </ul>

### 5.3 Enhanced Customer Due Diligence (ECDD)\*

	Priority areas of focus	Reference	Phase	Assessment focus
5.3.1	<b>AML/CTF Policy Framework</b>	Appendix I – 5 (g)	Design	<ul style="list-style-type: none"> <li>Ascertain whether Crown intends to update the AML Operating Guidelines in line with recommendations from the Initialism Report</li> </ul>

	Priority areas of focus	Reference	Phase	Assessment focus
5.3.2	<b>Customer risk assessment</b>	Appendix I – 5 and 11 (c)	Design	<ul style="list-style-type: none"> <li>Review Crown’s CRA methodology and Joint AML/CTF Program to ensure EWRA risks are reflected</li> <li>Ascertain whether Crown has considered what level of ECDD may be required with respect to any patrons identified as recipients of funds through the Hotel Card Transactions (HCT) channel (including the ML/TF risk profile of the channel) to determine the appropriate risk treatment</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess Crown’s risk-based approach to customer controls</li> <li>Review Crown’s new ECDD Standard and the supplementary guidance to determine whether the Source of Wealth (SoW) and Source of Funds (SoF) requirements are recorded and implemented/embedded</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Verify and test a sample of customers for whom ECDD has been performed to determine whether SoF/SoWs have been requested and verified (including escalations where SoF/SoW information was not received in a timely manner)</li> </ul>
5.3.3	<b>Politically Exposed Persons (PEPs)</b>	Appendix I – 5 (e)	Implement	<ul style="list-style-type: none"> <li>Review Crown’s remediation exercise to risk-mitigate its PEP population</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Verify and test a sample of patron accounts that have PEP cases awaiting review to ensure stops have been placed on their accounts</li> </ul>
5.3.4	<b>Process and controls improvement</b>	Appendix I – 5	Design	<ul style="list-style-type: none"> <li>Ascertain from Crown the progress of its mapping and documentation of the relevant trigger points through various customer journeys</li> <li>Assess whether Crown’s new case management system will contain features that focus on automation of escalation processes, improvement of workflows and traceability of the ECDD process</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Review Crown’s roadmap for the roll-out of the enhanced risk-based KYC process and ensure it has been embedded within Crown</li> <li>Assess whether Crown has updated its Significant Player Review (SPR) and ECDD processes to clearly delineate them from one another, and clarify how AML risk issues feature in the SPR process and how they are escalated through the ECDD process</li> </ul>



## 5.4 Ongoing Customer Due Diligence (OCDD)\*

	Priority areas of focus	Reference	Phase	Assessment focus
5.4.1	<b>Cage controls</b>	Appendix I – 5 (c)	Design	<ul style="list-style-type: none"> <li>Review training documents to verify that Crown has updated them to reflect the requirement of a ‘four eyes’ QA check for Transfer Acknowledgements (TAs)</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess Crown’s directive for a ‘four eyes’ QA check</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Verify and test a sample of TAs to ensure that a minimum of two Cage Area Managers/Case Supervisors (or above) have reviewed them</li> </ul>
5.4.2	<b>Cash and cash management</b>	Appendix I – 5 (a)	Design	<ul style="list-style-type: none"> <li>Ascertain whether Crown intends to adopt the Rewards Card controls recommended by Promontory</li> </ul>
5.4.3	<b>Crown patron accounts</b>	Appendix I – 5 (c)	Implement	<ul style="list-style-type: none"> <li>Assess Crown’s manual transaction monitoring rules register to ensure patron account controls and exception flags are included</li> </ul>
5.4.4	<b>Customer risk assessment</b>	Appendix I – 5 (e)	Design	<ul style="list-style-type: none"> <li>Ascertain whether Crown will undertake a bulk and periodic KYC refresh, including a refresh trigger for medium and low-risk patrons</li> </ul>
5.4.5	<b>Resourcing</b>	Appendix I – 5 (e), 5 (g), 9 and 10	Design	<ul style="list-style-type: none"> <li>Ascertain from Crown its plans regarding resourcing of transaction monitoring activities and managing its Unusual Activity Report (UAR) backlogs</li> </ul>
5.4.6	<b>Review and update of KYC information</b>	Appendix I –	Design	<ul style="list-style-type: none"> <li>Ascertain from Crown the progress regarding development of the Salesforce case management system and replacement of the current platforms (Unifii and Cura)</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess whether Crown has implemented the transaction monitoring rules and alerts recommended in the external reports</li> </ul>
5.4.7	<b>Transaction monitoring and reporting</b>	Appendix I – 5	Embed	<ul style="list-style-type: none"> <li>Review Crown’s detailed data lineage review of data from SYCO system into Sentinel and any synchronisation risks identified</li> <li>Verify and test a sample of transactions to ensure the manual and automated transaction monitoring rules and flags are effective</li> </ul>

## 5.5 Reporting and notification obligations\*

	Priority areas of focus	Reference	Phase	Assessment focus
5.5.1	<b>HCT</b>	Appendix I – 5 (f)	Design	<ul style="list-style-type: none"> <li>Ascertain from Crown its current view in relation to HCT as set out in the Deloitte Hotel Card Transactions report</li> </ul>
5.5.2	<b>Lookback of existing customers</b>	Appendix I – 5 (d)	Design	<ul style="list-style-type: none"> <li>Ascertain whether Crown intends to undertake a lookback regarding completeness of its historical regulatory reporting requirements</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Assess current status of the lookback exercise(s)</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Verify and test a sample of patrons and/or transactions as part of the lookback of historical regulatory reporting requirements</li> <li>Verify and test a sample of Crown’s reports (including Threshold Transaction Reports (TTRs), International Funds Transfer Instructions (IFTIs) and Suspicious Matter Reports (SMRs)) to ensure reporting obligations are being followed in the appropriate timeframes</li> </ul>
5.5.3	<b>Policies and procedures</b>	Appendix I – 5 (b)	Design	<ul style="list-style-type: none"> <li>Ascertain whether Crown intends to address the recommendations set out in the external reports regarding its reporting obligations and controls</li> </ul>
			Implement	<ul style="list-style-type: none"> <li>Review Crown’s policies and procedures regarding its reporting obligations, including its UAR Investigations Guideline</li> </ul>
			Embed	<ul style="list-style-type: none"> <li>Assess whether Crown has implemented the reduced timeframes in service level agreements</li> <li>Verify and test a sample of Crown’s reports (including TTRs, IFTIs and SMRs) to ensure reporting obligations are being followed in the appropriate timeframes</li> </ul>
5.5.4	<b>Transaction monitoring and reporting</b>	Appendix I – 5 (e)	Design	<ul style="list-style-type: none"> <li>Ascertain Crown’s current intention regarding its Unifii workflow tool, and case management and customer information systems</li> <li>Assess Crown’s case management and customer information systems</li> </ul>
5.5.5	<b>UARs</b>	Appendix I – 5 (b) and 5 (c)	Embed	<ul style="list-style-type: none"> <li>Verify and test the automated workflow tool (Unifii) and a sample of UAR case investigation files</li> </ul>

## 5.6 Other

	Priority areas of focus	Reference	Phase	Assessment focus
5.6.1	<b>Resourcing/budgeting</b>	Appendix I – 12 and 13	Design	<ul style="list-style-type: none"> <li>Ascertain from Crown the current status of its resourcing and budgetary plans</li> <li>Assess the adequacy of current state and future state plans in relation to resourcing and budgetary plans</li> </ul>
5.6.2	<b>AML/CTF Program</b>	Appendix I – 15 and 16	Implement	<ul style="list-style-type: none"> <li>Review and evaluate Crown's AML/CTF Program against its identified risks and regulatory AML/CTF requirements</li> <li>Review and evaluate Crown's AML/CTF program to ensure it contains all elements required under the Anti-Money Laundering and Counter-Terrorism Financing Act and relevant AML/CTF Rules under the AML/CTF Rules Instrument 2007 (No. 1)</li> </ul>
5.6.3	<b>Governance and Oversight</b>	Current operations	Embed	<ul style="list-style-type: none"> <li>Review and evaluate governance arrangements to ensure appropriate and timely oversight of AML/CTF obligations, including providing appropriate reports to the relevant bodies for oversight and decision-making purposes</li> </ul>
5.6.4	<b>Training</b>	Current operations	Design	<ul style="list-style-type: none"> <li>Ascertain from Crown the current status of its AML/CTF training program</li> </ul>
5.6.5	<b>Recommendations to which Crown has not responded</b>	Current operations	Design	<ul style="list-style-type: none"> <li>With regard to those items for which Crown has not provided a response for or implementation status/date, obtain an update from Crown to understand progress or intention to implement recommendation</li> </ul>

\* These activities will be coordinated across the financial crime and RSG work streams, given overlap.



## Appendix B: Appendix I of the Finkelstein Report

### Appendix I

#### Special Manager requirements

##### General

1. The Special Manager must consider:
  - a. whether there is any evidence of maladministration
  - b. whether there is any evidence of illegal or improper conduct
  - c. whether Crown Melbourne has engaged in conduct that may give rise to a material contravention of any law
  - d. the conduct of the casino operations generally since the conclusion of the Commission.
2. The Special Manager's report must:
  - a. contain details of each direction given by the Special Manager
  - b. state whether the direction was complied with
  - c. state whether Crown Melbourne's directors and executives cooperated with the Special Manager in the performance of its functions.

##### Risk management

3. The Special Manager is to evaluate whether:
  - a. Crown Melbourne has conducted a suitable root cause analysis into the failures outlined in the Report and in the Report of this Commission
  - b. Crown Melbourne has implemented, completely and effectively, the recommendations made by Mr Peter Deans in his Expert Report on the Risk Management Frameworks and Systems of Crown Resorts Limited<sup>1</sup>
  - c. an external review has been undertaken of the robustness and effectiveness of Crown Melbourne's risk management framework, systems and processes, and their appropriateness to Crown Melbourne as a casino operator, and whether any recommendations made as a result of that review have been implemented completely and effectively.

## Culture

4. The Special Manager is to determine whether Deloitte has completed Phase 4 of its Project Darwin and is to evaluate the implementation and effectiveness of Crown s cultural reform program.

## Anti-money laundering/counter-terrorism financing

### External report recommendations

5. The Special Manager is to evaluate whether there has been effective implementation of the recommendations set out in the following reports:

- a. **Promontory Phase 1 Report** dated 24 May 2021 and titled Phase 1: AML Vulnerability Assessment.<sup>2</sup> The recommendations are set out in section 4.
- b. **Promontory Phase 2 Draft Report** dated 20 June 2021 and titled Strategic Capability Assessment.<sup>3</sup> This report sets out a forward-looking strategic assessment and articulation of a target state model for Crown Resorts to achieve in order to manage financial crime risk.

The Special Manager is to assess whether Crown s financial crime workforce numbers, structures, roles and functions correspond with the target state articulated in this report.

- c. **Deloitte Phase 1 Report** dated 26 March 2021 and titled Assessment of Patron Account Controls.<sup>4</sup> The recommendations are summarised in a report dated 13 April 2021 titled Phase 1: Assessment of Patron Account Controls Assessment of Crown s Response.<sup>5</sup>
- d. **Deloitte Phase 2 Report** concerning a Forensic Review of Crown s Patron Accounts. The details of the Phase 2 Forensic Review are set out in Deloitte s engagement letter dated 22 February 2021.<sup>6</sup>
- e. **Deloitte Phase 3 Report** concerning a Further Controls Assessment. The details of the Further Controls Assessment are set out in Deloitte s engagement letter dated 22 February 2021.<sup>7</sup>
- f. **Deloitte Report on Hotel Card Transactions Review**. The details of the Hotel Card Transaction Review are set out in a document dated 8 July 2021 and titled Forensic Review: Updated Timings for Phase 2 and 3 of Forensic Review (including HCT matter).<sup>8</sup>
- g. **Initialism Transaction Monitoring Review** dated June 2021.<sup>9</sup> The recommendations are on pages 6, 14, 28-9, 37-8 and 44.

## **McGrathNicol report**

6. McGrathNicol's Forensic Review dated July 2021 identified preliminary indications of structuring and parking (being money laundering techniques) on Crown Melbourne's DAB accounts.<sup>10</sup>
7. McGrathNicol recommended further investigation of those transactions and the suspected structuring and parking.
8. The Special Manager is to determine whether the further investigation has occurred and, if so, whether any changes to Crown's AML/CTF Program are necessary and have been implemented.

## **Crown's Financial Crime and Compliance Change Program**

9. Crown's Financial Crime and Compliance Change Program (FCCCP) is set out in a document prepared by Mr Steven Blackburn, Crown's Group Chief Compliance and Financial Crime Officer, dated 24 May 2021.<sup>11</sup> The FCCCP focuses on 10 key areas for uplifting Crown's financial crime and compliance performance; namely people, risk appetite, frameworks, risk assessments, reporting and oversight, assurance, training, roles and responsibilities, customers and controls, and data and systems.
10. The Special Manager is to evaluate whether all the recommended reforms set out in the FCCCP (and any additions to that program) have been effectively implemented.

## **Other external expert work**

11. The Special Manager is to evaluate whether there has been effective implementation of any recommendation, whether or not set out in a report, in respect of the following work:
  - a. PwC Australia's work for Crown concerning an uplift in Crown's SMR reporting, TTR reporting and/or IFTI reporting;
  - b. Allens Linklaters' work for Crown concerning an uplift in Crown's SMR reporting, TTR reporting and/or IFTI reporting; and
  - c. an enterprise-wide risk assessment.

## **Resourcing**

12. The Special Manager is to assess the adequacy of Crown Melbourne's financial crime budget.
13. The Special Manager is to assess the adequacy of the staff numbers in the financial crime group.

## **AML/CTF Program**

14. The Special Manager is to evaluate whether the Crown Melbourne board is providing effective and meaningful oversight of its AML/CTF Program.
15. The Special Manager is to assess whether Crown Melbourne is complying with its AML/CTF Program.
16. The Special Manager is to review any internal or external audits conducted on any part of Crown Melbourne's AML/CTF Program and evaluate whether any non-compliance identified has been remedied.

## **Responsible service of gambling**

17. The Special Manager is to assess Crown Melbourne's responsible service of gambling program. This assessment should include examining:
  - a. the effectiveness of Crown Melbourne's staff training in the responsible service of gambling;
  - b. the adequacy of the responsible service of gambling staff numbers;
  - c. the adequacy of funding of Crown Melbourne's responsible service of gambling program;
  - d. the effectiveness of the services provided by the responsible service of gambling staff;
  - e. the effectiveness of Crown Melbourne's Self-Exclusion Program and related programs (for example Time Out);
  - f. the effectiveness of the responsible service of gambling enhancements approved in May 2021;<sup>12</sup> and
  - g. whether Crown Melbourne complies with its Gambling Code and Play Periods Policy.

## **Compliance with statutory and contractual obligations**

18. The Special Manager is to review whether Crown Melbourne complies with its obligations under the Casino Control Act, the Gambling Regulation Act, the Casino Agreement and the Management Agreement.

## Definitions

19. The following definitions apply to the terms in this document:
- a. **AML/CTF** means Anti-money laundering and counter-terrorism financing.
  - b. **Casino Agreement** means the agreement between the regulator (then known as the Victorian Casino Control Authority) and Crown Melbourne (then known as Crown Casino) on 21 September 1993 as amended from time to time.
  - c. **Crown Melbourne** means Crown Melbourne Limited.
  - d. **DAB** means deposit account balance.
  - e. **IFTI** means international funds transfer instruction.
  - f. **Management Agreement** means the agreement between the State and Crown Melbourne (then known as Crown Casino) on 20 April 1993 as amended from time to time.
  - g. **SMR** means suspicious matter report.
  - h. **TTR** means transaction threshold report.

Whenever the Special Manager is required to report on the implementation of recommendations or reforms, the Special Manager should also report on the implementation of any variation to those recommendations or reforms.

## Endnotes

1 Exhibit RC0971 Peter Deans Expert Report on the Risk Management Frameworks and Systems of Crown Resorts Limited, 29 June 2021.

2 Exhibit RC0100 Promontory Phase 1: AML Vulnerability Assessment, 24 May 2021.

3 Exhibit RC0397 Promontory Phase 2: Strategic Capability Assessment Report, 20 June 2021.

4 Exhibit RC0084 Statement of Lisa Dobbin, 16 April 2021, Annexure e.

5 Exhibit RC0084 Statement of Lisa Dobbin, 16 April 2021, Annexure f.

6 Exhibit RC0084 Statement of Lisa Dobbin, 16 April 2021, Annexure f.

7 Exhibit RC0084 Statement of Lisa Dobbin, 16 April 2021, Annexure a; see in particular Appendix 1. The terms of the engagement were varied by letter dated 19 March 2021: Exhibit RC0084 Statement of Lisa Dobbin, 16 April 2021, Annexure b.

8 See Exhibit RC0476 Deloitte Crown Resorts Updated Timing for Phase 2 and 3 of Forensic Review, 30 June 2021 for details on the scope of this work and report.

9 Exhibit RC1351 Initialism Transaction Monitoring Review Crown Resorts, June 2021.

10 Exhibit RC1460 McGrathNichol Forensic Review AML/CTF Report, 19 July 2021.

11 Exhibit RC0311 Further Supplementary Statement of Steven Blackburn, 7 June 2021, Annexure a.

12 Exhibit RC0696 Minutes of Crown Resorts board meeting, 24 May 2021; Exhibit RC0122 Letter from Allens Linklaters to Solicitors Assisting, 26 May 2021.

## Appendix C: Crown Board, Board committee and management committee meetings to 30 June 2022 attended by the Special Manager and/or OSM representatives

	Board or committee name	Synopsis	Crown chair*	Jan	Feb	Mar	Apr	May	Jun
Crown Resorts Limited	Crown Resorts Board	The Board guides and monitors Crown Resorts on behalf of shareholders. It is responsible for identifying areas of significant business risk and ensuring arrangements are in place to manage those risks.	Dr Ziggy Switkowski AO				19†	20†	
	Audit and Corporate Governance Committee	The principal role of the committee is to assist the Crown Resorts Board to fulfil its responsibilities relating to monitoring the integrity of Crown Resorts' financial statements, the effectiveness of its internal control systems, and the effectiveness, performance, independence and objectivity of the internal and external auditors.	Toni Korsanos					5	
	Responsible Gaming Committee	The role of the committee is to monitor and review responsible gaming programs and policies at each of Crown Resorts' wholly owned businesses.	Jane Halton			30			1
	Risk Management Committee	The principal role of the committee is to assist the Crown Resorts Board in fulfilling its responsibility to monitor, oversee and assess: <ul style="list-style-type: none"> <li>(a) the implementation, and effectiveness, of the company's Risk Management Policy, Risk Management Strategy and Risk and Compliance Culture Framework;</li> <li>(b) The risk appetite as set by the Board;</li> <li>(c) the management of risk across the Group, including the Risk Profiles; and</li> <li>(d) the effectiveness, resourcing and performance of the company's risk management function with respect to the company's size, scope, operations and complexity.</li> </ul>	Jane Halton			30			1

\* The chair arrangements listed here were those applying before the Blackstone Inc. acquisition took effect on 24 June 2022.

† Special, out-of-session meetings of the Crown Resorts Board.

	Board or committee name	Synopsis	Crown chair	Jan	Feb	Mar	Apr	May	Jun
Crown Melbourne Limited	Crown Melbourne Board	The Board is responsible for guiding and monitoring Crown Melbourne on behalf of its shareholders. In addition, the Board is responsible for identifying areas of significant business risk and ensuring arrangements are in place to adequately manage those risks.	Nigel Morrison		8				3
	Audit and Risk Committee	The function of the committee is to assist the Board to fulfil its corporate governance responsibilities in relation to: (a) financial reporting; (b) corporate control and risk management; (c) internal audit; and (d) external audit.	Bruce Carter		1			31	
	Compliance Committee	The primary function of the committee is to ensure that Clause 19.2 of the Company's Articles of Association (Duty to Maintain Casino Licence) is fulfilled. The committee also has the responsibility to assist the Board to monitor compliance by the company with all other legislative and regulatory requirements and deal with compliance or related issues that are brought before it.	Nigel Morrison		1			31	

	Board or committee name	Synopsis	Crown chair	Jan	Feb	Mar	Apr	May	Jun
Committees have responsibility for subject matter that is ultimately reported to the Executive Risk and Compliance Committee and/or Board Committees	Financial Crime Oversight Committee (FCOC)	<p>The FCOC's primary function is to assist the Boards of Crown Resorts and each reporting entity within Crown Resorts designated business group in fulfilling its oversight responsibilities with respect to the Group's exposure to financial crime risk. The FCOC is tasked with monitoring and assessing the effectiveness of financial crime compliance programs and initiatives of Crown Resorts and the designated business group (DBG) entities with the obligations contained within the:</p> <ol style="list-style-type: none"> <li>1. AML/CTF Act</li> <li>2. AML/CTF Rules</li> <li>3. Crown Resorts Joint AML/CTF Policy</li> <li>4. Crown Resorts Joint AML/CTF Program</li> <li>5. Crown Resorts Joint AML/CTF Standards which together form the AML/CTF Framework.</li> </ol>	Steven Blackburn			31		26	
	Financial Crime Working Group (FCWG)	<p>The FCWG supports the FCOC in monitoring and assessing compliance with the obligations of Crown Resorts and each reporting entity within the Crown Resorts DBG contained within the:</p> <ol style="list-style-type: none"> <li>1. AML/CTF Act</li> <li>2. AML/CTF Rules</li> <li>3. Crown Resorts Joint AML/CTF Policy</li> <li>4. Crown Resorts Joint AML/CTF Program</li> </ol> <p>Crown Resorts Joint AML/CTF Standards.</p>	Armina Antoniou			29	27	25	29



	Board or committee name	Synopsis	Crown chair	Jan	Feb	Mar	Apr	May	Jun
Committees have responsibility for subject matter that is ultimately reported to the Executive Risk and Compliance Committee and/or Board Committees	Transaction Monitoring Council (TMC)	The TMC oversees the transaction monitoring program, including data, systems, rules and alerts, and reports to key stakeholders: the CRO and the FCWG.	Dan Rule				5, 29	31	28
	Persons of Interest (POI) Committee	<p>Ensures that Crown Resorts' casinos remain free from criminal influence or exploitation, by reviewing POI who are brought to the attention of the committee for a variety of unacceptable behaviours, including but not limited to allegations relating to:</p> <ol style="list-style-type: none"> <li>1. dealing in proceeds of crime</li> <li>2. threatening the safety of patrons or staff</li> <li>3. drug dealing, theft or fraud</li> <li>4. illegal activity occurring on-site</li> <li>5. illegal activity occurring off-site</li> <li>6. money laundering/terrorism financing.</li> </ol> <p>The committee reviews any information presented to it and decide whether the POI should be permitted to continue to access and/or transact with Crown, or whether a withdrawal of licence notice (WOL), Notice Revoking Licence (NRL) and Exclusion Order should be issued to the POI, preventing them from accessing and/or transacting with Crown.</p>	Michelle Fielding				28		
	Responsible Service of Alcohol Steering Committee	Takes a proactive role in ensuring that Crown demonstrates best industry practices in RSA practices and initiatives in a commercially viable and sustainable way.	Mark Mackay						

## Appendix D: Information Requests made to Crown in the first six months of operation and a summary of Crown's response

Request No.	Date	Description of Request	Action taken by Crown
1.	11 January 2022	<ol style="list-style-type: none"> <li>1. Organisational structure</li> <li>2. Governance committees and other key decision groups</li> <li>3. Board and committee papers</li> <li>4. Crown's reform program</li> <li>5. External matters of concern</li> <li>6. Crown's corporate strategy and risk management</li> <li>7. Crown's legal compliance obligations</li> <li>8. Independent monitorship of Crown Sydney</li> </ol>	<ul style="list-style-type: none"> <li>• Crown advised that the provision of documents was completed on 3 March 2022.</li> <li>• Crown is providing papers of its Board, Compliance Committee and Audit Committee on an ongoing basis.</li> <li>• Further compliance was requested by the OSM on 12 April 2022 for papers of Crown's Executive Risk and Compliance Committee that were not initially considered by Crown to be within scope. Crown complied with this request on 19 April 2022.</li> </ul>
2.	11 February 2022	<ol style="list-style-type: none"> <li>1. Audit Committee:               <ol style="list-style-type: none"> <li>a. reports, policies and findings relevant to the 'root cause analysis'</li> <li>b. copies of open and closed 'management action plans'</li> </ol> </li> <li>2. Crown Melbourne Board – 8 February 2022: 11 documents</li> </ol>	<ul style="list-style-type: none"> <li>• Crown advised that the provision of documents was completed on 3 March 2022.</li> </ul>
3.	18 February 2022	<p>Crown Melbourne and Crown Resorts' committees and working groups:</p> <ol style="list-style-type: none"> <li>1. copies of most recent meeting minutes</li> <li>2. 2022 meeting schedule</li> </ol> <p>12 committees/working groups identified.</p>	<ul style="list-style-type: none"> <li>• Crown advised that the provision of documents was completed on 11 March 2022.</li> <li>• Crown raised a concern about irrelevant or sensitive information contained in some minutes of Crown Resorts' committees and working groups. These were inspected by OSM representatives and either not provided if the OSM did not require them, or provided to the OSM in redacted form.</li> </ul>
4.	2 March 2022	<ol style="list-style-type: none"> <li>1. Crown Resorts Remediation Plan:               <ol style="list-style-type: none"> <li>a. advice on frequency of review, amendment, and status reporting of the plan</li> <li>b. copy of latest version</li> </ol> </li> <li>2. Policy Uplift Program:</li> </ol>	<ul style="list-style-type: none"> <li>• Crown advised that the provision of documents was completed on 11 March 2022.</li> <li>• The OSM requested further compliance on 20 April 2022 in relation to certain policies, and Crown complied on 29 April 2022.</li> </ul>

Request No.	Date	Description of Request	Action taken by Crown
		<ul style="list-style-type: none"> <li>a. Crown 'As-is' policy register</li> <li>b. Phase 2 (policy uplift) Roadmap and sequence</li> <li>c. Target State Policy (Architecture) Framework</li> </ul>	
5.	17 March 2022	<p>Policy Uplift Program:</p> <ul style="list-style-type: none"> <li>1. A detailed status report outlining Crown's progress against the milestones as set out in the indicative high-level timeline for Phase 2 of review</li> <li>2. a current and most recent prior version of the Code of Conduct for both Crown Melbourne and Crown Resorts</li> <li>3. copies of several policies outlined in Crown's 'As-is' policy register</li> </ul>	<ul style="list-style-type: none"> <li>• Crown advised that the provision of documents was completed on 29 March 2022.</li> <li>• The OSM requested further compliance on 20 April 2022 in relation to certain policies, and Crown complied on 29 April 2022.</li> </ul>
6.	7 April 2022	<ul style="list-style-type: none"> <li>1. Reports referred to in Crown Resorts' Financial Crime Oversight Committee meeting on 31 March 2022: <ul style="list-style-type: none"> <li>a. Current State Assessment by PricewaterhouseCoopers</li> <li>b. Exiger Independent Review Report</li> <li>c. AUSTRAC Annual Compliance Report</li> <li>d. Enterprise Wide-Risk Assessment Report</li> </ul> </li> <li>2. Meeting papers associated with Crown Resorts' Responsible Gaming Committee on 8 February 2022</li> <li>3. Meeting papers and reports associated with various agenda items from the Crown Resorts Board meeting on 6 April 2022</li> <li>4. Submissions, reports etc. referred to in the Finkelstein Report</li> <li>5. Ongoing provision of certain parts of Crown Resorts Board papers</li> </ul>	<ul style="list-style-type: none"> <li>• Crown advised that the provision of documents was completed on 16 June 2022.</li> </ul>

Request No.	Date	Description of Request	Action taken by Crown
7.	13 May 2022	Range of documents relevant to Crown's Culture Change Program as referenced in the Crown Culture Project Plan	<ul style="list-style-type: none"> <li>Crown advised that the provision of documents was completed on 18 May 2022.</li> </ul>
8.	2 June 2022	<ol style="list-style-type: none"> <li>Additional documents relevant to Crown's Culture Change Program</li> <li>Documents relevant to Crown's Risk Uplift Program: <ol style="list-style-type: none"> <li>most current draft of the root cause analysis</li> <li>any feedback from Mr Peter Deans in reviewing the draft risk management document suite</li> </ol> </li> <li>Documents relevant to the responsible service of gaming: <ol style="list-style-type: none"> <li>Play Periods Policy</li> <li>papers and meeting minutes of the Crown Resorts Responsible Gaming Committee</li> <li>papers and meeting minutes of the Crown Melbourne Responsible Gaming Management Committee</li> </ol> </li> <li>Most recent version in Crown's possession of the Kroll <i>Crown Monitorship Report – Phase 1 Report</i></li> </ol>	<ul style="list-style-type: none"> <li>An initial set of documents was provided on 9 June 2022 with further documents provided on 23 June 2022. There is ongoing consultation between Crown and the OSM in relation to full compliance.</li> <li>The final Kroll <i>Crown Monitorship Report – Phase 1 Report</i> was provided directly to the OSM by Kroll on 10 June 2022.</li> </ul>

## Appendix E: Directions made to Crown in the first six months of operation and a summary of Crown's response

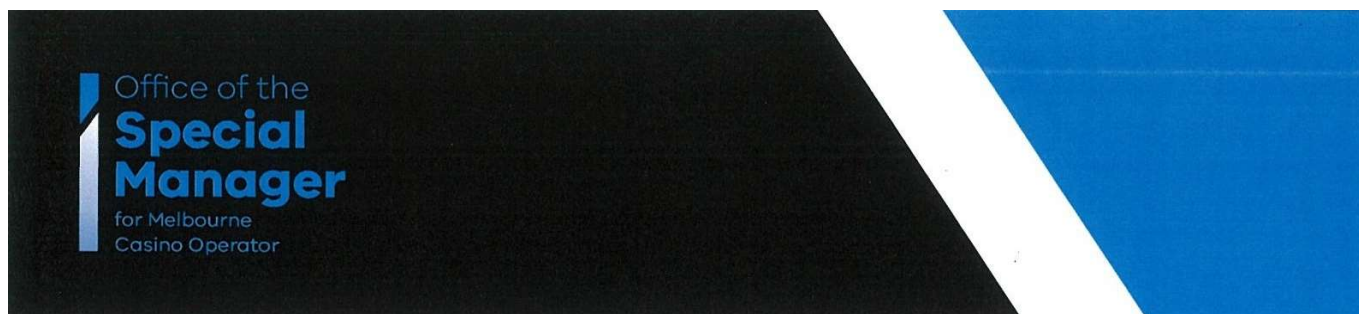
Direction No.	Date of Notice/Direction	Description of Direction	Action taken by Crown
1.	11 January 2022 (Notice) 17 January 2022 (Direction)	Information Request 1 to be complied with by COB 4 February 2022.	Crown provided documents by the required date and confirmed this in writing on 3 March 2022 as per Direction 8.
2.	11 January 2022 (Notice) 17 January 2022 (Direction)	Information requested that is able to be gathered before the required date to be supplied promptly to the OSM.	Crown has sometimes provided documents before the required date.
3.	11 January 2022 (Notice) 17 January 2022 (Direction)	The OSM to be included on Crown's electronic distribution list of papers to Crown Board members.	<ul style="list-style-type: none"> <li>In late January, the Special Manager and Deputy Special Managers were provided access to Diligent (Board paper distribution application).</li> <li>Papers of meetings of the Board, Audit Committee and Compliance Committee are also provided to the OSM.</li> </ul>
4.	11 January 2022 (Notice) 17 January 2022 (Direction)	The OSM to be kept informed of all dealings between Crown and the Victorian Government and as relevant its departments and agencies such as the VGCCC, DJCS, VRGF and Victoria Police through the prompt supply of correspondence and records of discussions.	<ul style="list-style-type: none"> <li>Crown responded to Notice of Intention on 14 January 2022. Stated that Crown agreed in principle but that the Direction could present practical challenges to Crown due to volume of correspondence it would produce.</li> <li>Crown is implementing a new internal system to capture correspondence and records so that they can be provided to the OSM.</li> <li>The OSM and Crown are having ongoing discussions about the kinds of correspondence and records that need to be provided to enable the OSM to fulfil its functions.</li> </ul>



Direction No.	Date of Notice/Direction	Description of Direction	Action taken by Crown
5.	20 January 2022 (Notice) 23 January 2022 (Direction)	Provide to the OSM all documents and information requested without delay being caused by review and classification of the documents for potential privilege, confidentiality and like claims.	Crown confirmed on 21 January 2022 that it would comply.
6.	18 February 2022 (Notice) 21 February 2022 (Direction)	Information Request 2 to be complied with by COB 25 February 2022.	Crown provided documents by the required date and confirmed this in writing on 3 March 2022 as per Direction 8.
7.	18 February 2022 (Notice) 21 February 2022 (Direction)	Information Request 3 to be complied with by COB 4 March 2022.	Crown provided documents after the required date.
8.	18 February 2022 (Notice) 21 February 2022 (Direction)	Crown to notify the OSM when in its view all information pertaining to an Information Request has been provided.	Crown is so far continuing to comply.
9.	2 March 2022 (Notice) 9 March 2022 (Direction)	Crown is to provide the OSM with an implementation plan detailing how Crown Melbourne is planning to take remediation action in response to the recommendations from the Finkelstein Royal Commission.	<ul style="list-style-type: none"> <li>• Crown made submissions in response to the Notice of Intention on 4 March 2022 that the Direction should not be made at this time because of pending government consultation and legislative and regulatory responses.</li> <li>• The Special Manager informed Crown on 8 March 2022 that Direction would be made. See Appendix F.</li> </ul>
10.	9 March 2022 (Direction)	Crown to provide the OSM with a draft of the plan referenced in Direction 9 by 31 March 2022.	<ul style="list-style-type: none"> <li>• Crown provided a draft high-level version of the MRAP, in partial compliance with Directions 9 and 10.</li> </ul>

Direction No.	Date of Notice/Direction	Description of Direction	Action taken by Crown
11.	11 March 2022 (Notice) 14 March 2022 (Direction)	The OSM to be kept informed of all dealings between Crown and the Commonwealth Government and as relevant its departments and agencies including AUSTRAC, the AFP, ASIC, ABF, ATO and ACIC.	<ul style="list-style-type: none"> <li>• Crown is implementing a new internal system to capture correspondence and records so that they can be provided to the OSM.</li> <li>• OSM and Crown are having ongoing discussions about the kinds of correspondence and records that need to be provided to enable the OSM to fulfil its functions.</li> </ul>
12.	10 May 2022 (Notice) 13 May 2022 (Direction)	OSM to be provided with a regular monthly status report on the progress of Crown's draft MRAP.	<ul style="list-style-type: none"> <li>• Crown provided an updated draft MRAP as at 10 June 2022 in purported compliance with Direction 12.</li> </ul>

## Appendix F: Correspondence regarding Directions 9 and 10



### Notice of Intention to give a Direction

To: Melbourne Casino Operator  
Crown Melbourne Limited (Crown)

Date made: 2 March 2022

Made under: s36E *Casino Control Act 1991* (the Act)

Grounds: ss36E(2)(b) of the Act (best interests)

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You are hereby notified of my intention to give the direction set out below. Namely that:

Further to the Crown Resorts Limited, Remediation Plan - 23 December 2021 [CRW.701.011.5919] provided to the OSM in response to Information Request 1(4):

An implementation plan be provided to the OSM detailing how Crown Melbourne is - or plans to - take action in response to the recommendations relating to the casino operator from the report of the Royal Commission into the Casino Operator and Licence (October 2021), with particular reference to:

- recommendation 1 (improved identification)
- recommendation 2 (carded play)
- recommendation 3 (cashless play)
- recommendation 4 (information sharing with state law enforcement)
- recommendation 5 (information sharing with federal law enforcement)
- recommendation 6 (single patron bank account)
- recommendation 7 (surveillance footage)
- recommendation 8 (regulation of junkets)
- recommendation 9 (player card data)
- recommendation 10 (pre-commitment and time limits)
- recommendation 11 (gambling code)
- recommendation 12 (data collection)



- recommendation 19 (cooperation with the regulator)
- recommendation 26 (the area of the sub-lease)
- recommendation 28 (limit on shareholding)
- recommendation 29 (an independent board), and
- recommendation 30 (independence of senior management) (Direction no. 9).

Note: any direction not the subject of written submissions made by Crown within 3 days after this notice is given - refer s36E(3) - will take immediate effect (with the notice intended to be read mutatis mutandis).



**Stephen O'Bryan QC**  
**Special Manager**



Direct Line: [Redacted]

E-mail: [Redacted]

4 March 2022

**By email**

Mr Stephen O'Bryan QC Special Manager  
Office of the Special Manager  
for the Melbourne Casino Operator Level 27, 121 Exhibition Street  
Melbourne VIC 3000

Dear Mr O'Bryan,

**Notice of Intention to give a Direction under s36E of the *Casino Control Act 1991 (Act)* dated 2 March 2022 (Proposed Direction 009)**

I refer to your letter of 3 March 2022 attaching Proposed Direction 009.

Proposed Direction 009 calls for Crown to provide an implementation plan detailing how Crown is – or plans to – take action in response to the recommendations from the Finkelstein Report, with particular reference to recommendations 1 to 12, 19, 26, and 28 to 30.

For the reasons outlined below, Crown submits that Proposed Direction 009 not be made at this time. This is because, out of the 18 recommendations identified in Proposed Direction 009, 16 of them have yet to be the subject of a legislative or regulatory response, pending completion of the detailed analysis and consultation currently being undertaken by the Government. As you are aware, Crown has provided draft submissions to the Department of Justice & Community Safety (**Department**) and continues to be in dialogue with the Department about those submissions.

Until the consultation process is complete and the legislative and regulatory response to those recommendations is finalised, Crown is not in a position to prepare a meaningful implementation plan in relation to those matters. We would be happy to provide the OSM with a current draft of Crown's submissions in relation to the outstanding recommendations in the Finkelstein Report and discuss our position in relation to them with you. Please let us know if that would be of assistance.

We also note that many of the Finkelstein recommendations concern matters which are the subject of the existing Crown Resorts Limited Remediation Plan, which has been provided to the OSM.

As discussed at our meeting on 2 March 2022, Crown is in the process of developing a targeted remediation action plan (**MRAP**) which incorporates the deliverables and implementation timeline for all remediation actions required at the Melbourne Casino (including but not limited to the Finkelstein Report recommendations which have been implemented by the Government and will, in time, incorporate the remainder of the recommendations to the extent necessary once implemented). Crown will share the MRAP and updates to it with the OSM as it is developed.

Of the two recommendations identified in Proposed Direction 009 which have been the subject of a legislated response, Crown notes that these will be incorporated into the MRAP.

In light of the above, Crown submits that Proposed Direction 009 not be made and, instead, Crown and the OSM continue to correspond regarding the development and implementation of the MRAP.

Please let me know if you would like to discuss further. Yours sincerely,

Redacted



**Steve McCann**

Chief Executive Officer Crown Melbourne Limited

Copy to:

**Christine Howlett**

Deputy Special Manager – Operations & Strategy  
Office of the Special Manager  
for the Melbourne Casino Operator

**Shannon Byrne**

Group General Manager – Financial Crime  
– Regulatory and Strategy Crown Resorts Limited

9 March 2022

Our ref: BC/22/4188

Mr Steve McCann Chief Executive Officer  
Crown Melbourne Limited 8 Whiteman Street  
SOUTHBANK VIC 3006

via email: Redacted

Dear Mr McCann

**Notice of Intention to give Directions nos. 9 & 10**

I am writing in response to your letter dated 4 March 2022. Further to our discussion yesterday, I confirm my decision to nevertheless make the enclosed Directions nos. 9 and 10.

While I appreciate there is still to be legislated a further tranche of reform amendments to the *Casino Control Act 1991* (Vic), in my view, and in light of Crown's current unsuitability to hold a casino operator's licence, it is important that Crown immediately commence a comprehensive action plan in response to the findings and recommendations of the Finkelstein Royal Commission report as per Direction no. 9.

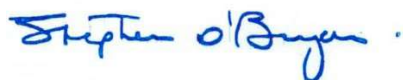
In this regard I have in mind a similar approach to the Agreed Remediation Action Plan required in New South Wales in response to the Bergin inquiry. This tailored action plan for Crown Melbourne will be updated periodically, reflect actions taken and expected next steps and cover all relevant projects and activities, including relevant milestones, delivery timeframes, governance arrangements and assurance activities across the reform program areas aligned with the Finkelstein report recommendations and Appendix I.

As we discussed and for efficiencies sake, I understand that in some areas it will be necessary for Crown to note work done and underway reflecting the fact that some of the Government's second tranche of legislative reforms are yet to be finalised.

As we also discussed, I am prepared to delay directing a date by which the plan should be finalised, as well as a schedule for regular reporting by Crown on progress, to enable further discussions at officer level on the format of the plan and appropriate timing for those to occur. However, I do see the need to progress the matter by imposing a date for an initial draft to be provided to the OSM (i.e., Direction no. 10).

Thank you again for your submissions on this matter and our meeting yesterday.

Yours sincerely



**Stephen O'Bryan QC**  
**Special Manager**

cc: Mr Shannon Byrne – General Manager – Regulatory Response

## Directions

To: Melbourne Casino Operator  
Crown Melbourne Limited (Crown)

Date made: 9 March 2022

Made under: s36E *Casino Control Act 1991* (the Act)

Grounds: ss36E(2)(b) of the Act (best interests)

---

Further to the Crown Resorts Limited, Remediation Plan - 23 December 2021 [CRW.701.011.5919] provided to the OSM in response to Information Request 1(4):

1. An implementation plan be provided to the OSM detailing how Crown Melbourne is - or plans - to take remediation action in response to the recommendations relating to the casino operator from the report of the Royal Commission into the Casino Operator and Licence (October 2021), with particular reference to:
  - recommendation 1 (improved identification)
  - recommendation 2 (carded play)
  - recommendation 3 (cashless play)
  - recommendation 4 (information sharing with state law enforcement)
  - recommendation 5 (information sharing with federal law enforcement)
  - recommendation 6 (single patron bank account)
  - recommendation 7 (surveillance footage)
  - recommendation 8 (regulation of junkets)
  - recommendation 9 (player card data)
  - recommendation 10 (pre-commitment and time limits)
  - recommendation 11 (gambling code)
  - recommendation 12 (data collection)
  - recommendation 19 (cooperation with the regulator)
  - recommendation 26 (the area of the sub-lease)

- recommendation 28 (limit on shareholding)
  - recommendation 29 (an independent board), and
  - recommendation 30 (independence of senior management) (Direction no. 9).
2. By 31 March 2022 or as otherwise agreed in writing between the designated officers of the OSM and Crown, Crown provide the OSM with a draft of the plan (Direction no. 10).



**Stephen O'Bryan QC**  
**Special Manager**

# Appendix G: Crown Melbourne Board Paper: Melbourne Remediation Action Plan (3 June 2022)

## Memorandum from the CEO to the Crown Melbourne Board

### Crown Melbourne Limited Memorandum

#### For Approval

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**To:** Board of Directors

**From:** Steve McCann, Chief Executive Officer, Crown Melbourne and Crown Resorts

**Date:** 3 June 2022

**Subject:** Melbourne Remediation Action Plan

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### Recommendation

It is recommended the draft MRAP be endorsed.

### Purpose

This paper provides the Board of Directors (**Board**) of Crown Melbourne Limited (**CML**) with:

- the proposed Melbourne Remediation Action Plan (**MRAP**), a draft of which is enclosed (**Appendix 1**) for your consideration;
- Crown's proposal to establish a transformation function to manage the governance and
- reporting on the various change programs, particularly with respect to the remediation plans on foot; and
- Crown's proposed plan and actions to address the requirement to report on the status of the MRAP to the Office of the Special Manager (**OSM**) on a monthly basis.

### Background

In response to the findings in the Final Report of the Victorian Royal Commission into the Casino Operator and Licence (**RCCCOL Report**), CML has developed a discrete reform plan to implement the recommendations outlined in the RCCCOL Report for Crown Melbourne.

### Approach

Appendix I of the RCCOL Report sets out the key areas of reform which the Special Manager must evaluate, including:

- **Risk** - including the root-cause analysis into the failings identified in the Royal Commission and the 22 recommendations made by Peter Deans in his expert report.
- **Culture** - including Deloitte's work and the implementation of the culture change program.
- **AML/CTF** - including the FCCCP, the independent review of the Joint Program by Exiger, the ML/FT enterprise-wide risk assessment (EWRA), the external consultant reports of Deloitte, Promontory, McGrathNicol and Initialism and the current state assessment of our AUSTRAC reporting - conducted by Kavi Attygalle and PwC.

- **Responsible Gaming** - including enhanced responsible gaming training, resources, funding, services, Self Exclusion Program, the effectiveness of the May 2021 Enhancements and compliance with the Gambling Code and Play Periods Policy.
- **Compliance** - including whether Crown Melbourne complies with its obligations under the *Casino Control Act 1991* (Vic), the *Gambling Regulation Act 2003* (Vic), the *Casino Agreement* and *Casino (Management Agreement) Act 1993* (Vic).

Further, the MRAP incorporates two deliverables in respect of Tranche 1, the prohibition of junkets and significant breach reporting, as well as the balance of the recommendations the subject of Tranche 2, a number of which remain the subject of ongoing consultation with the Victorian government. At the direction of the Special Manager, a high-level description of the steps Crown Melbourne may undertake to give effect to the proposed Tranche 2 recommendations has also been incorporated into the plan.

The MRAP incorporates the relevant aspects of the various uplift streams currently in place at Crown Resorts, including the:

- Risk Uplift Plan (**RUP**);
- People and Culture Change Program (**P+CCP**);
- Financial Crime and Compliance Change Program (**FCCCP**);
- Responsible Gaming Change Program (**RGCP**); and
- Policy Uplift Program (**PUP**).

The MRAP was developed in consultation with the various project sponsors and delivery leads. The MRAP is unique to CML and leverages Crown-wide reforms where possible. A number of initiatives, for example the People and Culture Change Program, will be reviewed upon the implementation of the initial deliverables to agree a Phase 2 approach to support embedment. This will be worked through as we progress the MRAP.

## Governance

Following the approval of the MRAP, governance will transition to the Transformation Program Office (**PMO**). The PMO will oversee program governance and the reporting arising out of the three State based remediation plans, which will replace the previous Group Remediation Plan.

To date, governance of Crown's remediation program has been coordinated through:

- weekly Transformation Steering Committee meeting chaired by the former Group EGM of Transformation and Regulatory Response, Nick Weeks to review progress against the Crown Resorts Remediation Action Plan (**RAP**);
- weekly Group Leadership Team meetings with updates on the RAP provided by Nick Weeks and subsequently Jeannie Mok;
- progress updates on the RAP to the Crown Resorts and subsidiary board meetings;
- monthly updates on the RAP sent to the three State regulators.

A high level summary of the transformation function is attached at **Appendix 2**.

## Reporting

On a monthly basis, CML must provide status reports to the OSM setting out:

- any amendments made to the MRAP in the reporting period; and
- all status updates in the reporting period, including clear updates on deliverables, milestones, delivery timeframes, associated resourcing and funding, project ownership, governance and other relevant activities.



Please find *enclosed* a draft proposal setting out the form for status reporting against the workstreams under each of the change programs.

## **Regulatory engagement**

We note that a high-level summary of the draft MRAP has already been provided to the Office of the Special Manager in late March following the receipt of a written direction.

Further, a similar draft was provided to the VGCCC on 10 May 2022. In correspondence with Ms Kimmitt, it was proposed that the MRAP would supersede the Crown Resorts Remediation Action Plan and that monthly provision of the MRAP would satisfy the requirements of the Commission imposed by the Commission's Letter of Censure to Crown Melbourne dated 27 April 2021.

## **Attachments**

Appendix 1 – Draft Crown Melbourne Remediation Action Plan

Appendix 2 – Group Transformation Program Proposal

## Appendix H: Draft Crown Melbourne Remediation Action Plan (10 June 2022)

**Draft for discussion**



### **Draft** Crown Melbourne Remediation Action Plan (MRAP)

Last updated: 10 June 2022

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## Draft Crown Melbourne Remediation Action Plan (MRAP)

Last updated: 6 June 2022

### General - Special Manager Requirements

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
1 General	Redacted	The Special Manager's Duties and Responsibilities	Ongoing obligation	N/A	The Special Manager must consider: (a) whether there is any evidence of maladministration; (b) whether there is any evidence of illegal or improper conduct; (c) whether Crown Melbourne has engaged in conduct that may give rise to a material contravention of any law; (d) the conduct of the casino operations generally since the conclusion of the Commission.	31/12/2023
2 General	Redacted	The Special Manager's Report	Ongoing obligation	N/A	The Special Manager's report must: (a) contain details of each direction given by the Special Manager; (b) state whether the direction was complied with; (c) state whether Crown Melbourne's directors and executives cooperated with the Special Manager in the performance of its functions.	31/12/2023

## Risk Management

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
3.A Root Cause Analysis	Redacted	Conduct a 'root cause' analysis into the failures outlined in the RCCOL report	External Consultant engaged to assist Crown to understand the extent to which a 'Root Cause' analysis of the failures outlined in the RCCOL report has been undertaken. Where a 'Root Cause' analysis has not been undertaken, an approach has been developed	30/06/2022	<ul style="list-style-type: none"> <li>(1) Completion of RCA work by EY as per the agreed Statement of Work;</li> <li>(2) Develop an action plan (including resources and timeframes) for any additional analysis required to complete the RCA - to be identified by EY (if required);</li> <li>(3) Presentation of the results of the RCA to the CRL, CML Board;</li> <li>(4) Agreement of any additional actions or remediation required based on the results of the RCA.</li> </ul>	31/11/2022
3.B Risk Management Frameworks and Systems	Redacted	Implement the recommendations made by Mr Peter Deans in his external Expert Report on the Risk Management Frameworks and Systems of Crown Resorts Limited	Successful completion of 21 recommendations made in Peter Dean's Expert Report on the Risk Management Frameworks and Systems of Crown Resorts Limited	30/09/2022	As set out further in <i>Annexure 1 – Risk Management</i>	31/12/2022
3.C External Review	Redacted	In accordance with Recommendation 22 made in the Peter Dean's Expert Report, commission an external review of the robustness and effectiveness of Crown Melbourne's risk management framework, systems and processes, and their appropriateness to Crown Melbourne as a casino operator, and whether any recommendations made as a result of that review have been implemented completely and effectively	<ul style="list-style-type: none"> <li>(1) Prepare statement of work to be undertaken;</li> <li>(2) Engage external third party to undertake the independent review;</li> <li>(3) Sign Engagement Letter to undertake the work.</li> </ul>	30/07/2022	<ul style="list-style-type: none"> <li>(1) Completion of effectiveness review;</li> <li>(2) Issuance of final report;</li> <li>(3) Table report for the next CML Audit Committee and CRL Audit &amp; Corporate Governance Committee meeting.</li> </ul>	31/12/2022

## Culture

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
4 People and Culture Uplift	Redacted	Finalise Culture Reform Program Roadmap	Complete Culture Review and design of roadmap	Complete	As set out further in <i>Annexure 2 - Culture</i>	15/12/2022

## External AML/CTF Reports

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
5.A Promontory Phase 1 Report	Redacted	Implementation of the recommendations set out in Promontory Phase 1 Report	As set out further in the <i>Crown Regulatory Commitments Register - Phase 1 Master ('Commitments Register')</i> . Note that the Commitments Register is separate to the MRAP.	N/A	Implementation of the recommendations set out in Promontory Phase 1 Report – as set out further in the <i>Commitments Register</i> .	31/12/2023
5.B Promontory Phase 2 Report	Redacted	Implementation of the recommendations set out in Promontory Phase 2 Report	As set out further in the <i>Crown Regulatory Commitments Register - Phase 1 Master ('Commitments Register')</i> . Note that the Commitments Register is separate to the MRAP.	N/A	Implementation of the recommendations set out in Promontory Phase 2 Report – as set out further in the <i>Commitments Register</i> .	1/01/2023
5.C Deloitte Phase 1 Report	Redacted	Implementation of the recommendations set out in Deloitte Phase 1 Report	As set out further in the <i>Crown Regulatory Commitments Register - Phase 1 Master ('Commitments Register')</i> . Note that the Commitments Register is separate to the MRAP.	N/A	Implementation of the recommendations set out in Deloitte Phase 1 Report – as set out further in the <i>Commitments Register</i> .	Complete
5.D Deloitte Phase 2 Report	Redacted	Implementation of the recommendations set out in Deloitte Phase 2 Report	As set out further in the <i>Crown Regulatory Commitments Register - Phase 1 Master ('Commitments Register')</i> . Note that the Commitments Register is separate to the MRAP.	N/A	Implementation of the recommendations set out in Deloitte Report on Hotel Card Transactions Review - a as set out further in the <i>Commitments Register</i> .	31/12/2023
5.E Deloitte Phase 3 Report	Redacted	Implementation of the recommendations set out in Deloitte Phase 3 Report	As set out further in the <i>Crown Regulatory Commitments Register - Phase 1 Master ('Commitments Register')</i> . Note that the Commitments Register is separate to the MRAP.	N/A	Implementation of the recommendations set out in Deloitte Phase 3 Report - as set out further in the <i>Commitments Register</i> .	31/12/2023

5.F Deloitte HCT Report	Redacted	Implementation of the recommendations set out in Deloitte Report on Hotel Card Transactions Review	As set out further in the <i>Crown Regulatory Commitments Register - Phase 1 Master ('Commitments Register')</i> . Note that the Commitments Register is separate to the MRAP.	N/A	Implementation of the recommendations set out in Deloitte Report on Hotel Card Transactions Review - as set out further in the <i>Commitments Register</i> .	30/11/2022
5.G Initialism Transaction Monitoring Review	Redacted	Implementation of the recommendations set out in Initialism Transaction Monitoring Review	As set out further in the <i>Crown Regulatory Commitments Register - Phase 1 Master ('Commitments Register')</i> . Note that the Commitments Register is separate to the MRAP.	N/A	Implementation of the recommendations set out in Initialism Transaction Monitoring Review - as set out further in the <i>Commitments Register</i> .	30/06/2022
6 McGrathNicol Report	Redacted	McGrathNicol's Forensic Review dated July 2021 identified preliminary indications of 'structuring' and 'parking' (being money laundering techniques) on Crown Melbourne's DAB accounts.	N/A - Implement-only Deliverable	N/A	Finalise investigation recommended by the McGrathNicol report dated July 2021.	30/09/2022
7 McGrathNicol Report	Redacted	McGrathNicol's Forensic Review dated July 2021 recommended further investigation of those transactions and the suspected structuring and parking.	N/A - Implement-only Deliverable	N/A	Finalise investigation recommended by the McGrathNicol report dated July 2021.	30/09/2022
8 McGrathNicol Report	Redacted	The Special Manager is to determine whether the further investigation has occurred and, if so, whether any changes to Crown's AML/CTF Program are necessary and have been implemented.	N/A - Implement-only Deliverable	N/A	Implement any necessary changes to Crown's AML/CTF Program resulting from the investigation.	30/09/2022

## FCCCP

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
9 FCCCP	Redacted	Financial Crime and Compliance Change Program (FCCCP)	FCCCPs areas of focus are managed through 10 structured workstreams or "Initiatives" responsible for design and implementation of deliverables.	N/A	Implementation of the recommended reforms set out in the FCCCP (and any additions to that program).	31/03/2023
10.1 ML/TF Risk Assessment	Redacted	Uplift Risk Assessment Models	Uplift existing ML/TF risk models and develop future ML/TF risk assessment models to appropriately measure the ML/TF risk of Crown's customers, products, channels and jurisdictions.	30/06/2022	Items for ML/TF Risk Assessment are set out further in <i>Annexure 3 - FCCCP</i>	30/09/2022



10.2 Transaction Monitoring and Reporting	Redacted	Uplift of Transaction Monitoring Program and Reporting	Facilitate efficient uplift, support, training and management of TM processes for Crown Melbourne to monitor, identify and report potential suspicious transactions. Streamline internal reporting channels through a digitisation approach, as well as collaborate with internal and external intelligence sources.	Complete	Items for Transaction Monitoring and Reporting are set out further in <i>Annexure 3 - FCCCP</i>	31/12/2022
10.3 AML/CTF Training Implementation	Redacted	Uplift of AML/CTF Training and Implementation	Develop fit-for-purpose AML/CTF training programs for all Crown employees, covering relevant regulatory and industry requirements and expectations.	30/06/2022	Items for AML/CTF Training Implementation are set out further in <i>Annexure 3 - FCCCP</i>	30/09/2022
10.4 Customer/ Product Uplift	Redacted	Enhanced AML/CTF Controls	Develop and enhance key AML/CTF controls within the first line business to address identified vulnerabilities and ensure continuous improvement. Key enhancements include customer verification systems and cash interactions with provided products and services.	Complete	Items for Customer/ Product Uplift are set out further in <i>Annexure 3 - FCCCP</i>	30/06/2022
10.5 Financial Crime Obligations and Controls	Redacted	Establish Assurance Function	Establish the FC&C Assurance function to define, monitor and test Crown's FC&C obligations.	19/08/2022	Items for FC Obligations and Controls are set out further in <i>Annexure 3 Annexure 3 - FCCCP</i>	23/09/2022
10.6 Governance	Redacted	Resourcing and Governance	Oversee resourcing capacity and requirements across FC&Cs different business units. Establish, enhance and coordinate appropriate governance forums to facilitate strong oversight of Crown's financial crime obligations.	Complete	Items for People and Governance are set out further in <i>Annexure 3 Annexure 3 - FCCCP</i>	1/07/2022
10.7 Ongoing Customer Due Diligence	Redacted	Ongoing Customer Risk Enhancement	Uplift Crown's OCDD processes to enhance Crown's effective management of customer risk. Key focus areas include ongoing customer reviews, training, technology and resourcing capacity.	31/10/2022	Items for Ongoing Customer Due Diligence are set out further in <i>Annexure 3 - FCCCP</i>	N/A
10.8 Governance, Risk and	Redacted	Implement a GRC Tool	Develop and implement a fit-for-purpose Enterprise Governance, Risk and Compliance (GRC) tool to support Crown effectively manage end-to-end	30/06/2022	Items for Governance, Risk and Compliance Tool are set out further in <i>Annexure 3 - FCCCP</i>	31/12/2022



Compliance Tool			GRC requirements and increasing regulatory commitments.			
10.9 Supplier Due Diligence	Redacted	Uplift Supplier and Vendor Framework	Uplift Crown's Group Procurement Risk Framework to ensure effective management of its supplier/vendor risk across ML/TF, human rights, ESG and corporate risk domains.	30/06/2022	Items for Supplier Due Diligence are set out further in <i>Annexure 3 - FCCCP</i>	N/A
10.10 Policy Uplift Program	Redacted	Policy Design/Uplift for Suite of Group Policies	Draft the suite of policies, including rationalising existing Crown policies and creating consistency and improve governance and compliance.	Complete	Items for Policy Uplift Program are set out further in <i>Annexure 3 - FCCCP</i>	28/03/2023

### Other External Work

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
11.A & 11.B IFTI / SMR / TTR Review	Redacted	Current State Assessment	Complete the current state assessment of Crown's SMR reporting, TTR reporting and/or IFTI reporting, and uplift any controls deficiencies identified.	Complete	Control deficiencies identified in the current state assessment are uplifted. Additional items are set out further in <i>Annexure 4 – Other External Work</i>	17/03/2023
11.C ML/TF EWRA	Redacted	2021 ML/TF EWRA Recommendations	Implement recommendations arising out of 2021 ML/TF EWRA.	30/09/2022	Items for ML/TF EWRA are set out further in <i>Annexure 4 – Other External Work</i>	7/12/2022

### Resourcing

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
12 Report on CMLs FC Budget	Redacted	Report on CMLs FC Budget	Ongoing obligation	N/A	Periodically review CMLs budget through resourcing reports focused on Financial Crime within CML.	31/12/2023
13 Report on CMLs FC Resourcing Plan	Redacted	Report on CMLs FC Resourcing Plan	Ongoing obligation	N/A	Periodically review staff number levels through resourcing reports generated specific to each Crown property.	31/12/2023

## AML/CTF Program

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
14 Special Manager Requirements – Assess Board Oversight of the AML/CTF Program	Redacted	Board Oversight of AML/CTF Program	Ongoing obligation	N/A	Provision of Financial Crime Board (CRL and CML Board) and Committee (RMC, FCOC, FCWG) updates together with relevant minutes to the Special Manager. Invitation of Special Manager to relevant Board and Committee Meetings.	31/12/2023
15 Special Manager Requirements – Assess Compliance with Current AML/CTF Program	Redacted	Provide all Internal and External Reports on AML/CTF Program	Ongoing obligation	N/A	Provide the Special Manager any: <ul style="list-style-type: none"> <li>- Independent Review Reports;</li> <li>- AUSTRAC Compliance Assessment Reviews</li> <li>- internal reports relating to FC compliance (including from Internal Audit and FC&amp;C Assurance if relevant); and</li> <li>- any management responses or action/remediation plans in relation to the above.</li> </ul>	31/12/2023
16 Special Manager Requirements – Review Internal or External Audits on AML/CTF Program	Redacted	Board Oversight of AML/CTF Program	Ongoing obligation	N/A	Provide the Special Manager of any: <ul style="list-style-type: none"> <li>- Independent Review Reports;</li> <li>- Internal Audit Reports (relating to AML/CTF Program);</li> <li>- External Audit Reports (relating to AML/CTF Program) and</li> <li>- any management responses or action/remediation plans in relation to the above (including evidence of relevant closure criteria) to the Special Manager.</li> </ul>	31/12/2023

## Responsible Gaming

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
17.A Training	Redacted	Implement Enhanced RG Training	<p>Develop enhanced RG training focusing on strengthening positive employee and leadership behaviours to improve responsible gaming outcomes for customers (such as improved psychological safety) and enable positive culture reform.</p> <p>Further items for RG Training are set out in <i>Annexure 5 – Responsible Gaming</i></p>	31/07/2022	Items for RG Training are set out in <i>Annexure 5 - Responsible Gaming</i>	31/12/2022
17.B Resourcing	Redacted	Report on CMLs RG Resourcing	<p>On a quarterly basis, review CMLs staff numbers through resourcing reports focused on Responsible Gaming within CML in the context of all elements of the RGCP and regulatory expectations.</p> <p>Further items for RG Resourcing are set out in <i>Annexure 5 – Responsible Gaming</i></p>	31/07/2022	Items for RG Resourcing are set out in <i>Annexure 5 - Responsible Gaming</i>	31/12/2022
17.C Funding	Redacted	Report on CMLs RG Program Funding	Ongoing obligation	N/A	On a quarterly basis, review CMLs budget through resourcing reports focused on Responsible Gaming within CML to assess the adequacy of funding of Crown Melbourne's responsible service of gambling program	31/12/2023
17.D Services	Redacted	Identify and implement opportunities for improvements for RG services and reporting	<p>Assess the effectiveness of responsible service of gambling staff and uplift RG reporting.</p> <p>Further items for RG Services Provided are set out in <i>Annexure 5 – Responsible Gaming</i></p>	30/08/2022	Items for RG Services Provided are set out in <i>Annexure 5 – Responsible Gaming</i>	31/12/2022
17.E Programs	Redacted	Implement CML Self-Exclusion Program and Related Programs	<ol style="list-style-type: none"> <li>(1) Uplift processes for monitoring revocation customers</li> <li>(2) Investigation options for Means to Exclude</li> <li>(3) Develop a state-wide Exclusion Register</li> </ol>	30/09/2022	Items for Self Exclusion Program are set out in <i>Annexure 5 – Responsible Gaming</i>	31/12/2022

			Further items for Self Exclusion Program are set out in <i>Annexure 5 - Responsible Gaming</i>			
17.F May 2021 RG Enhancements Paper	Redacted	Implement RG Enhancements Approved in May 2021	Cease Crown Rewards Members Bingo and Bus/Red Carpet Program and review Crown Rewards Loyalty Program.  Further items for May 2021 RG Enhancements are set out in <i>Annexure 5 – Responsible Gaming</i>	31/07/2022	Items for May 2021 RG Enhancements are set out in <i>Annexure 5 – Responsible Gaming</i>	31/03/2023
17.G Gambling Code and Play Periods Policy	Redacted	Ensure compliance with the Gambling Code and Play Periods Policy	Items for Gambling Code and Play Periods Policy are set out in <i>Annexure 5 - Responsible Gaming</i>	30/12/2022	Items for Gambling Code and Play Periods Policy are set out in <i>Annexure 5 - Responsible Gaming</i>	15/03/2023

### Compliance with Statutory and Contractual Obligations

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
18 Compliance	Redacted	Obligations Mapping	Develop an obligations register for Crown Melbourne's obligations under the Casino Control Act, the Gambling Regulation Act, the Casino Agreement and the Management Agreement ('Obligations'); map key controls to these Obligations; perform a control design effectiveness assessment for the identified key controls; and identify associated control gaps/weaknesses.  Items for Obligations Mapping are set out in <i>Annexure 6 - Compliance</i>	31/12/2022	Action owners identified and action owners to have developed actions arising from the findings of control design effectiveness assessments.  Items for Obligations Mapping are set out in <i>Annexure 6 - Compliance</i>	31/03/2023

### Tranche 1 Recommendations

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
8	Redacted	Crown will prohibit any junket to operate at the casino, and will not otherwise	Ensure all relevant policies and procedures have been amended to reflect the changes in section 81AAD of	Complete	Ensure revised policies are signed off by relevant Gaming business unit executives; confirm application and	Complete

Regulation of Junkets		make any arrangement with a junket or a junket operator.	the Casino Control Act; undertake actions and implement corresponding controls pursuant to policy revisions as required to close out or otherwise resolve all historical agreements and links with former junket operators.		effectiveness of controls to underpin policy decisions.	
19 Breach Escalation	Redacted	Develop a breach escalation framework to give effect to sect 27A of the Casino Control Act	Develop a breach reporting protocol and draft a breach reporting policy. Establish an escalation framework and procedure for determine where a regulatory breach gives rise to an actual or likely breach, escalating them to relevant stakeholders and the regulator.	Complete	Implement the breach reporting policy and procedure.	TBC

## Tranche 2 Recommendations

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
1 Improved identification	Redacted	Refer to Recommendation 2	Refer to Recommendation 2	TBD	Refer to Recommendation 2	TBD
2 Carded Play	Redacted	Identify and implement available technical options for implementation of compulsory carded play (including the collection of Recommendation 9 data) at the Melbourne Casino	<ol style="list-style-type: none"> <li>(1) Completion of systems review, including assessment of system capability (estimated timeframe is at least 6 months for the assessment).</li> <li>(2) Analysis of the technical options to facilitate carded play (including collection of Recommendation 9 data) and identification of preferred option.</li> <li>(3) Engagement with vendors on timeframe and requirements for delivery of preferred option.</li> <li>(4) Budget and costs approved by CML board and senior management.</li> </ol>	TBD	<p>Identify the implementation closure criteria after the systems review and analysis of available technical options is complete, and engagement with vendors has taken place.</p> <p>Crown estimates that timeframes for compulsory carded play for EGMs and eTGs:</p> <ul style="list-style-type: none"> <li>- 18 months to 2 years for new EGMs and eTGs based on the standard product development and approval processes for new products; and</li> <li>- 5 years or more for the replacement of all existing EGMs and eTGs at the Melbourne Casino, assuming a replacement rate of about 18% per annum.</li> </ul> <p>Compulsory carded play for table games is estimated 2 - 3 years.</p>	TBD



3	Cashless Play	Redacted	Move to cashless gaming utilising digital payment technology over time	<ol style="list-style-type: none"> <li>(1) Explore technical pathways and integration methods for the implementation of Cashless Play.</li> <li>(2) Engage a third party provider to develop a digital wallet tool that would permit cashless play and integrate with Crown Melbourne's gaming.</li> <li>(3) Enter into Proof of Concept arrangement with developer of digital wallet tool.</li> </ol>	TBD	Trial cashless play through a phase-in period to allow Crown Melbourne's venues and customers to adjust to the new technology.	TBD
4	Information sharing with state law enforcement	Redacted	Entry into information sharing protocol with Victoria Police	CML will use reasonable endeavours to enter into an information sharing protocol. The government is also liaising with Victorian Police on this recommendation.	31/12/2022	Executed Memorandum of Understanding between Crown Melbourne Limited and Victoria Police.	31/12/2023
5	Information sharing with federal law enforcement	Redacted	Entry into information sharing protocol with Australian Criminal Intelligence Commission	<p>CML will use reasonable endeavours to enter into an information sharing protocol. The government is also liaising with ACIC on this recommendation.</p> <ol style="list-style-type: none"> <li>(1) Finalise information sharing Memorandum of Understanding with the Australian Criminal Intelligence Commission.</li> </ol>	Complete	<ol style="list-style-type: none"> <li>(1) Execute Memorandum of Understanding between Crown Melbourne Limited and Australian Criminal Intelligence Commission.</li> <li>(2) Confirm regular meetings with ACIC to improve Crown's ability to combat financial crime.</li> </ol>	Complete
5	Information sharing with federal law enforcement	Redacted	Entry into information sharing protocol with Australian Federal Police	<p>CML will use reasonable endeavours to enter into an information sharing protocol. The government is also liaising with the Australian Federal Police (AFP) on this recommendation.</p> <ol style="list-style-type: none"> <li>(1) Finalise information sharing Memorandum of Understanding with the AFP.</li> </ol>	31/12/2022	Executed Memorandum of Understanding between Crown Melbourne Limited and the AFP.	31/12/2023
6	Single Patron bank account	Redacted	Reduction in the number of patron bank accounts into which patrons are able to transfer funds electronically	<ol style="list-style-type: none"> <li>(1) Commence the process of closing down various patron bank accounts and determine the treatment of certain credit balance in foreign accounts.</li> <li>(2) Advise VGCCC of account closures.</li> </ol>	N/A	Close down various patron bank accounts and determine the treatment of certain credit balance in foreign accounts.	Complete
7		Redacted	Expand current capability to retain additional security and surveillance footage	<ol style="list-style-type: none"> <li>(1) Amend the Surveillance ICS' minimum retention period to 28 days;</li> </ol>	TBD	Once the surveillance retention period is confirmed by the Victorian Government,	TBD

<b>Surveillance Footage</b>			(2) Consult VGCCC on proposed interim retention period; (3) Once interim arrangement is confirmed by the VGCCC, create a cost plan for Crown Melbourne's surveillance footage as specified in RCCOL and engage vendors to upgrade existing hardware.		CML to upgrade existing hardware in line with this recommendation.	
<b>9 Player Card Data</b>	Redacted	Refer to Recommendation 2	Refer to Recommendation 2	TBD	Refer to Recommendation 2	TBD
<b>10 Pre-commitment and Time Limits</b>	Redacted	Work with government and industry participants to undertake research into pre-commitment mechanisms	Work with government and industry participants to undertake research into pre-commitment mechanisms.	TBD	Subject to government consultation	TBD
<b>11 Gambling Code</b>	Redacted	Review existing code in preparation for consultation with government	No immediate action for Crown	N/A	No immediate action for Crown	N/A
<b>12 Data Collection</b>	Redacted	Nominate appropriately qualified Crown Melbourne appointee to the proposed Data Committee	Nominate appropriately qualified Crown Melbourne appointee to the proposed Data Committee	TBD	Subject to government consultation	TBD
<b>26 The Area of the Sub-lease</b>	Redacted	Amend the definition of 'Melbourne Casino' in the Management Agreement so as to align that definition with the approved casino boundaries under s17 of the Casino Control Act.	(1) Crown to contact the VGCCC to discuss necessary amendments to the Management Agreement. (2) Update the Management Agreement to include all amendments agreed with the VGCCC.	N/A	Executed variation to the Management Agreement	TBD
<b>28 Limit on Shareholding</b>	Redacted	[To be resolved subject to external advice]	Work with government around safe guards to inadvertent breaches.	TBD	[To be resolved subject to external advice]	TBD
<b>29 Independent Board</b>	Redacted	[To be resolved subject to external advice]	[To be resolved subject to external advice]	TBD	[To be resolved subject to external advice]	TBD
<b>30 Independence of Senior Management</b>	Redacted	[To be resolved subject to external advice]	[To be resolved subject to external advice]	TBD	[To be resolved subject to external advice]	TBD



**Draft for discussion**



## **Draft MRAP Annexures**

**Last updated:** 10 June 2022

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## DRAFT MELBOURNE REMEDIATION ACTION PLAN (MRAP) - Annexure 1 Risk Management

Last updated: 6 June 2022

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
3.A Root Cause Analysis	Redacted	Conduct a 'root cause' analysis into the failures outlined in the RCCOL report	External Consultant engaged to assist Crown to understand the extent to which a 'Root Cause' analysis of the failures outlined in the RCCOL report has been undertaken. Where a 'Root Cause' analysis has not been undertaken, an approach has been developed.	30/06/2022	<ol style="list-style-type: none"> <li>(1) Completion of RCA work by EY as per the agreed Statement of Work</li> <li>(2) Develop an action plan (including resources and timeframes) for any additional analysis required to complete the RCA - to be</li> <li>(3) identified by EY (if required)</li> <li>(4) Presentation of the results of the RCA to the CRL, CML Board</li> <li>(5) Agreement of any additional actions or remediation required based on the results of the RCA</li> </ol>	31/11/2022
3.B Risk Management Frameworks and Systems	Redacted	Implement the recommendations made by Mr Peter Deans in his external Expert Report on the Risk Management Frameworks and Systems of Crown Resorts Limited	Successful completion of 21 recommendations made in Peter Dean's Expert Report on the Risk Management Frameworks and Systems of Crown Resorts Limited.	30/09/2022	Recommendations 1 - 21 of the Peter Deans Expert Report are set out further in 3.B.1 - 3.B.21 below	31/12/2022
3.B.1 Risk Management Frameworks and Systems	Redacted	Expand the "Introduction and background" of the Risk Management Committee Charter to explicitly state the purpose of the Risk Management Committee	Update RMC Charter to include the expansion of Risk Management Committee's role covering areas such as management of risk across the group, board and group risk appetite, and the Group's risk management frameworks. The RMC Charter is updated to include details of the Risk Management Committee's role to provide objective review and oversight of the management of risk across the Group, to support the setting of risk appetite by the Group's Board, the monitoring of risk appetite and overall risk profile of the Group, and the design, implementation, and operation of the Group's risk management frameworks.	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete
3.B.2	Redacted	Insert into the Risk Management Committee Charter a new section	(1) RMC Charter is updated to include the role of the Chair of the RMC in	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete

Risk Management Frameworks and Systems		outlining the role of the Chair of the Risk Management Committee	<p>managing the Risk Management Committee's responsibilities, liaising with the Board, Audit and Corporate Governance and other relevant Committees, and liaising with the CRO.</p> <p>(2) RMC Work Plan is updated to include the role of the Chair of the RMC. It outlines the Chair's role in agreeing with the other committee members and management a schedule of regular agenda items for meetings during a year.</p>			
3.B.3 Risk Management Frameworks and Systems	Redacted	Insert into the Risk Management Committee Charter a new section outlining role of the Risk Management Committee in overseeing the resourcing, operation, and effectiveness of the Risk Management Function	RMC Charter is updated to include the appointment and termination of the CRO, resourcing of the Risk Management Function, communication protocols (formal and informal) between the CRO and the Risk Management Committee, and the review of the operation and effectiveness of the Risk Management Function led by the CRO	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete
3.B.4 Risk Management Frameworks and Systems	Redacted	Insert into the Risk Management Committee Charter a new section outlining the role of the Risk Management Committee in relation to matters raised by internal or external audit	Update the RMC Charter to include the roles and responsibilities and related protocols for assessment, monitoring and resolution of any such matters that may arise. The updated RMC Charter clearly states how audit issues are resolved and the relative roles of the Risk Management Committee and Audit and Corporate Governance Committee.	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete
3.B.5 Risk Management Frameworks and Systems	Redacted	Include in the current Section 4 (Proceedings) of the Risk Management Committee Charter explicit invitations to the Committee meetings	Section 4 (Proceedings) of the RMC Charter is updated to include explicit invitations to the Committee meetings for the CEO, CRO, CFO and Group General Manager - Internal Audit	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete
3.B.6 Risk Management Frameworks and Systems	Redacted	Insert new section within the RMC Charter to explicitly require the RMC members to meet with the CRO and Head of Internal Audit and Head of Compliance on at least an annual basis	<p>(1) RMC Charter is updated to include requirement of RMC members to meet with the CRO and Head of Internal Audit and Head of Compliance.</p> <p>(2) RMC Charter states the cadence of such meetings, noting it is at least on an annual basis.</p>	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete

			(3) RMC Charter states meetings are without management present.			
3.B.7 Risk Management Frameworks and Systems	Redacted	Expand Section 3 (Duties, responsibilities and powers) to explicitly include oversight, review and assessment of a number of key items of the management of risk in the Risk Management Strategy	RMC Charter is updated and Section 3 (Duties, responsibilities and powers) explicitly include oversight, review and assessment of a number of key items of the management of risk in the Risk Management Strategy.  The items included are receiving and reviewing an independent report (at least once every three years) on the appropriateness, effectiveness, and adequacy of the RMS, having the Risk Management Committee satisfy itself that the RMS continues to be sound, and having the Risk Management Committee satisfy itself that the Group is operating within the risk appetite set by the board.	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete
3.B.8 Risk Management Frameworks and Systems	Redacted	Insert into the Risk Management Committee Charter a new section outlining the Risk Management Committee's role with respect to risk culture within the Group.  Update Audit and Corporate Governance Committee Charter, improving the oversight, governance, and management of risk at the Group.	(1) RMC is updated to include a new section outlining the responsibility for assisting management in establishing and maintaining a sound risk culture, reviewing and assessing risk culture from time to time (including the use of independent, external reviews commissioned by the Risk Management Committee or management), forming a view on the Group's risk culture with respect to the Group's risk appetite and reporting to the board on risk culture-related matters.  (2) Audit and Corporate Governance Committee Charter is updated with the effect of improving the oversight, governance, and management of risk at the Group	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete
3.B.9 Risk Management Frameworks and Systems	Redacted	Expand the "Introduction and background" of the Audit and Corporate Governance Committee Charter to better articulate the role of the Audit and Corporate Governance Committee	Audit and Corporate Governance Committee Charter is updated and clearly articulates the Audit and Corporate Governance Committee's role in regard to the internal control framework for the Group, the role and	Complete	Audit and Corporate Governance Committee Charter is approved by Crown Resorts Limited Board	Complete



			performance of the internal audit function, the interaction with the external auditor on matters other than financial reporting and taxation, its role in the Group's RMS, and interaction with the Risk Management Committee			
<b>3.B.10</b> <b>Risk Management Frameworks and Systems</b>	Redacted	Insert into the Audit and Corporate Governance Committee Charter a new section outlining in detail the relationship between the internal audit function and the Audit and Corporate Governance Committee	Audit and Corporate Governance Committee Charter is updated outlining the Audit and Corporate Governance Committee's oversight of and interaction with the internal audit function, the reporting line(s) of the internal auditor, the processes to oversee and endorse the annual audit plan proposed by internal audit and management, and the role and performance of the internal audit function	Complete	Audit and Corporate Governance Committee Charter is approved by Crown Resorts Limited Board	Complete
<b>3.B.11</b> <b>Risk Management Frameworks and Systems</b>	Redacted	Insert into the Audit and Corporate Governance Committee Charter a new section outlining the role of the Committee in overseeing the resourcing, operation and effectiveness of the internal audit function	Audit and Corporate Governance Committee Charter is updated and includes a provision detailing the role of the Committee in the appointment and termination of the internal auditor, ensuring the adequate resourcing of the internal audit function, the communication protocols (formal and informal) between the internal auditor and the Audit and Corporate Governance Committee, and reviewing the operation and effectiveness of the internal audit function	Complete	Audit and Corporate Governance Committee Charter is approved by Crown Resorts Limited Board	Complete
<b>3.B.12</b> <b>Risk Management Frameworks and Systems</b>	Redacted	Include in the Audit and Corporate Governance Committee Charter a requirement to periodically obtain an external assessment on the adequacy and effectiveness of the Group's internal audit function and processes	Audit and Corporate Governance Committee Charter is updated and includes the requirement to periodically obtain an external assessment on the adequacy and effectiveness of the Group's internal audit function and processes	Complete	Audit and Corporate Governance Committee Charter is approved by Crown Resorts Limited Board	Complete
<b>3.B.13</b> <b>Risk Management Frameworks and Systems</b>	Redacted	Insert into the Audit and Corporate Governance Committee Charter a new section outlining the role of the Audit and Corporate Governance Committee in relation to specific matters or issues raised by internal or external audit	Audit and Corporate Governance Committee Charter is updated and includes detail of the role of the Audit and Corporate Governance Committee has in relation to matters or issues raised by internal or external audit.  The section outlines the roles and responsibilities and related protocols for	Complete	Audit and Corporate Governance Committee Charter is approved by Crown Resorts Limited Board	Complete

			assessment, monitoring and resolution of any such matters or issues that may arise. It clearly states how audit issues are resolved and the relative roles of the Audit and Corporate Governance Committee and any other relevant committees that the board may have delegated responsibility to.			
<b>3.B.14</b> <b>Risk Management Frameworks and Systems</b>	Redacted	Include in the Membership of the Committee a requirement that the Chair of the Risk Management Committee be a member of the Audit and Corporate Governance Committee	The RMC Membership includes a requirement that the Chair is also a member of the Audit and Corporate Governance Committee.  This requirement enables the free flow of information between the Audit and Corporate Governance Committee and Risk Management Committee, facilitating the efficient workings of both committees, thereby assisting the management of risk across the Group.	Complete	The updated RMC membership is approved by the RMC and the Audit and Corporate Governance Committee.	Complete
<b>3.B.15</b> <b>Risk Management Frameworks and Systems</b>	Redacted	Insert into the Audit and Corporate Governance Committee Charter a new section outlining the role of the Audit and Corporate Governance Committee	The Audit and Corporate Governance Committee Charter is updated and includes a new section outlining the role of the Audit and Corporate Governance Committee in relation to reviewing processes and controls that support management certifications for the Group's half-year and full-year financial reporting, management's report on risk management and internal controls over financial reporting processes, and any external audit reporting.	Complete	Audit and Corporate Governance Committee Charter is approved by Crown Resorts Limited Board	Complete
<b>3.B.16</b> <b>Risk Management Frameworks and Systems</b>	Redacted	Review the reporting lines of the Group General Manager – Internal Audit to the Crown Resorts board and subcommittees and document in the Position Description for this role	(1) The reporting lines of the Group General Manager – Internal Audit to the Crown Resorts board and subcommittees are reviewed, clarified, and documented in the Position Description for this role. In addition, the commentary is expanded on the relationships and interactions with Crown Resorts' Board, the Audit and Corporate Governance Committee, the Risk Management Committee, and the audit committees of the subsidiary companies (as appropriate) are included in the Position Description.	Complete	Reporting lines and position description of the Group General Manager - Internal Audit are approved by the Audit and Corporate Governance Committee.	Complete



			(2) the Position Description is aligned with the contents of the RMS and the Audit and Corporate Governance Committee Charter in regard to internal audit.			
<b>3.B.17</b> Risk Management Frameworks and Systems	Redacted	Develop a standalone Risk Appetite Statement (RAS), separate to the RMS	(1) The RAS is updated to include risk appetite for all business risks documented in greater detail than at present in the RMS. The RAS contains more granular detail, the governance protocols for periodically reviewing and assessing changes to risk appetite in response to changes in the Group's risk profile arising from changes to the internal or external environment  (2) Endorsement of the RAS by RMC. (3) Approval by CRL Board.	Complete	Metrics complete and included in RMC and CRL Board reporting	30/09/2022
<b>3.B.18</b> Risk Management Frameworks and Systems	Redacted	Review the Group's Risk Matrix and its underlying methodology and approve it annually by the Risk Management Committee	RMC Charter now includes the requirement of an annual review of the Group's Risk Matrix is conducted by the Risk Management Committee	Complete	The updated RMC Charter is approved by Crown Resorts Limited Board	Complete
<b>3.B.19</b> Risk Management Frameworks and Systems	Redacted	Confirm specific roles and responsibilities of the subsidiary boards in relation to risk management to the Risk Management Committee	(1) The RMS is amended to reflect the specific roles of the subsidiary boards and the exact nature of their relationships, and interaction with, the Risk Management Committee and Audit and Corporate Governance Committee  (2) Updated RMC Charter (3) Updated Audit Committee Charter (4) Updated ERCC Charters (5) Subsidiary Boards Charters (6) Approval from relevant Committees for updated Charters	30/09/2022	The updated Charters are approved by the relevant Board or Committee	31/12/2022
<b>3.B.20</b> Risk Management Frameworks and Systems	Redacted	Report a larger set of risks to the Risk Management Committee on a half yearly basis than the current risks documented in the RMS	The Corporate Risk Profile (material risks) presented to the RMC on a bi-annual basis. Content provided is frequent and reporting is detailed to the Group's Risk Management Committee. Committee are presented with the	Complete	The RMC Charter is updated in line with this recommendation.	Complete

			opportunity to review and discuss all business risks that have an inherent high rating and that are reliant on controls to remain within risk appetite			
<b>3.B.21 Risk Management Frameworks and Systems</b>	Redacted	The Risk Management Committee and management to develop and agree on a suite of Group-wide qualitative measures to better monitor and report if the Group is operating within or outside risk appetite	<ol style="list-style-type: none"> <li>(1) Qualitative measures are reported monthly to the ERCC, the subsidiary boards and the Risk Management Committee.</li> <li>(2) Progress reports at each scheduled Risk Management Committee outline progress made to bring the relevant risk issue back within appetite</li> <li>(3) Endorsement of the RAS by RMC</li> <li>(4) Approval of the RAS by CRL Board</li> </ol>	Complete	Metrics cascaded to each subsidiary board where appropriate Risk appetite reporting in place including action plans for risks outside of appetite	30/06/2022
<b>3.C External Review</b>	Redacted	In accordance with Recommendation 22 made in the Peter Dean's Expert Report, Commission an external review of the robustness and effectiveness of Crown Melbourne's risk management framework, systems and processes, and their appropriateness to Crown Melbourne as a casino operator, and whether any recommendations made as a result of that review have been implemented completely and effectively	<ol style="list-style-type: none"> <li>(1) Prepare statement of work to be undertaken</li> <li>(2) Engage external third party to undertake the independent review of Crown Melbourne's risk management framework</li> <li>(3) Sign Engagement Letter to undertake the work</li> </ol>	30/07/2022	<ol style="list-style-type: none"> <li>(1) Completion of effectiveness review</li> <li>(2) Issuance of final report</li> <li>(3) Table report for the next CML Audit Committee and CRL Audit &amp; Corporate Governance Committee meeting</li> </ol>	31/12/2022

## DRAFT MELBOURNE REMEDIATION ACTION PLAN (MRAP) - Annexure 2 Culture

Last updated: 27 May 2022

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
4 Current State Culture Review	Redacted	Finalise Culture Reform Program Roadmap	Complete Culture Review and design of Roadmap Please note the below initiatives align to the Culture Reform Program Roadmap	Complete	The completion of the below initiatives	15/12/2022
4.A Change & Measurement	Redacted	Finalise Culture Measurement Dashboard and quarterly reporting	Evidence of the design of Crown's culture measurement framework and executive summary, including lessons learned from recent public enquiries	Complete	A baseline Culture Dashboard report is developed and tabled at Board meetings to provide a pulse update on culture and progress along the program	30/09/2022
4.B Change & Measurement	Redacted	Conduct the 2022 culture survey	<p>(1) Culture survey methodology and plan is developed and approved by the CEO</p> <p>(2) A second organisation-wide culture survey is completed in 2022, providing insights on the progress of culture change, from qualitative analysis:</p> <ul style="list-style-type: none"> <li>- The employee' mindsets towards the aspired Crown culture and how they understand the benefits of new behaviours</li> <li>- The change in employee perception of leaders and whether leaders are perceived to be actively and consistently role modelling the new values and associated behaviours</li> <li>- The extent to which employee perception of psychological safety has improved</li> <li>- Whether employee feedback suggests that the cultural change program is supported by a formal environment that reinforces the desired behaviours</li> </ul>	31/08/2022	Survey period goes live with evidence of communications rolling out the survey across the organization	30/09/2022

<b>4.C</b> <b>Leadership Behaviour &amp; Commitment</b>	Redacted	Implement a leadership development program	Board Culture plan tabled and endorsed by Board including sign up by directors to the Crown Leadership pact (evidenced by agenda, papers, minutes and pacts)	31/08/2022	(1) Implement a leadership development program that ensures an emerging, suitable Crown leadership culture and ongoing stewardship of cultural reform  (2) Board effectiveness review commenced	28/10/2022
<b>4.D</b> <b>Leadership Behaviour &amp; Commitment</b>	Redacted	Implement a leadership development program	(1) Leaders build and reform BAU practices that move from a "detect and correct risk perspective" to a "predict and prevent approach", to minimize potential harm to stakeholders  (2) Evidence of the design of leadership development programs  (3) Evidence of design of risk management and compliance policies reinforcing the importance of prevention rather than predict and correct (response) [refer Risk uplift, FCCCP]	31/08/2022	(1) Evidence of roll out of relevant leadership development programs, evidenced by attendance records  (2) Evidence of risk and compliance policy roll outs [refer Risk uplift, FCCCP and RG plans]	1/12/2022
<b>4.E</b> <b>Leadership Behaviour &amp; Commitment</b>	Redacted	Implement a leadership development program	(1) Design a leadership development program to ensure cultural reform at middle manager levels to overcome "permafrost" existing at these levels (because cultural change will require the old guard to engage in personal change)  (2) Evidence of the design of leadership development initiatives	31/08/2022	(1) Implement a leadership development program to ensure cultural reform at middle manager levels to overcome "permafrost" existing at these levels (because cultural change will require the old guard to engage in personal change)  (2) Evidence of roll out of relevant leadership development programs, evidenced by attendance records (senior leaders and middle managers)	1/12/2022
<b>4.F</b> <b>People &amp; Performance Practices</b>	Redacted	Implement a revised performance development system	Evidence of the design of the revised performance development framework including alignment to Crown's values and purpose and culture goals and approved by CPCO	31/08/2022	(1) Implement a revised performance development framework that aligns individual performance expectations with Crown's aspired cultural goals  (2) The performance development framework is approved by the PRN (evidenced by board papers and minutes)  (3) The FY23 performance development framework is communicated to employees	28/10/2022

<b>4.G</b> <b>People &amp; Performance Practices</b>	Redacted	Implement a variable pay program	Evidence of the design of the Variable Pay Program including relevant financial and non-financial targets being finalised and approval by the CPCO	31/08/2022	(1) The performance development framework is approved by the PRN (evidenced by board papers and minutes) (2) The FY23 performance development framework is (3) communicated to employees	30/09/2022
<b>4.H</b> <b>People &amp; Performance Practices</b>	Redacted	Refresh the sexual harassment program	Evidence of the design of the refreshed Workplace Behaviour Policy and processes including consideration of the customer experience and approved by the CPCO	Complete	(1) Evidence of the approval of the refreshed Workplace Behaviour Policy by the CRL Board (evidenced by board papers and minutes) (2) Evidence of the launch of the refreshed sexual harassment program	Complete
<b>4.I</b> <b>Risk behaviours &amp; mindset</b>	Redacted	Implement an Ethical and Risk Intelligent Decision Making Model	Evidence of the design of updated risk training program including ethical decision making model	31/08/2022	Evidence of the developed Ethical and Risk Intelligent Decision Making	28/10/2022
<b>4.J</b> <b>Comms, Engagement &amp; External Stakeholder Relationship</b>	Redacted	Assess employee feedback from 2022 culture survey and incorporate relevant feedback into the Culture Reform Program	(1) Assess employee feedback from 2022 culture survey (2) Identify changes needed to the Culture Reform Program	31/10/2022	Seek endorsement from the relevant boards to implement the changes to the Culture Reform Program	15/12/2022



## DRAFT MELBOURNE REMEDIATION ACTION PLAN (MRAP) - Annexure 3 FCCCP

Last updated: 10 June 2022

\*Indicative timeframes that may be subject to plan complexity, vendor technical requirements/timelines, and internal technology/data prioritisation.

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
10.01 ML/TF Risk Assessment	Redacted	<b>CRA uplift (Melbourne)*</b> Development of an uplifted CRA approach and methodology which can be applied at scale to all new and existing registered customers of the Crown designated business group. Implementation in a suitable solution with detailed data procedures as required.	Methodology document developed and signed off.	30/04/2022	User testing outcomes to evidence the Methodology has been operationalised in systems.  Procedures, process maps and/or work instructions to outline process requirements of impacted teams. Rolling plan to risk assess all existing Crown customers.	30/06/2022
10.02 ML/TF Risk Assessment	Redacted	<b>Product risk assessment (PRA) uplift*</b> Uplifted standalone PRA methodology and process for assessing ML/TF risks before the introduction of a new designated service or at change (as appropriate). Implementation in a suitable solution with detailed data procedures as required.	Methodology document developed and signed off.	Complete	Procedures and guidance outlining the operationalisation of the product risk assessment methodology through an appropriate tool to calculate inherent and residual product risk ratings.	29/07/2022
10.03 ML/TF Risk Assessment	Redacted	<b>Channel risk assessment (ChRA) uplift*</b> Development and implementation of an uplifted ChRA methodology for assessing ML/TF risks before the introduction of a new channel, or at change (as appropriate). Implementation in a suitable solution with detailed data procedures as required.	Methodology document developed and signed off.	30/06/2022	Procedures and guidance outlining the operationalisation of the channel risk assessment methodology through an appropriate tool to calculate inherent Channel risk ratings.	30/09/2022
10.04 ML/TF Risk Assessment	Redacted	<b>Jurisdiction risk assessment (JRA) uplift*</b> Development and implementation of an uplifted JRA methodology for periodic assessment ML/TF risks associated with jurisdictions.	Methodology document developed and signed off.	30/06/2022	Procedures and guidance outlining the operationalisation of the Jurisdiction risk assessment methodology through an appropriate tool to calculate inherent Jurisdiction risk ratings.	30/09/2022

		Implementation in a suitable solution with detailed data procedures as required.				
10.05 Transaction Monitoring and Reporting	Redacted	<b>Financial Crime case management uplift</b>  Uplift of technology to support end to end management of financial crime investigations, customer due diligence and third-party requests including auditable decision points, SMR digitisation, single customer view/intelligence and unified risk register.	Salesforce pilot outcomes and full rollout plan including feature prioritisation.	Complete	Evidence of operationalisation of features including UAT testing outcomes.	31/12/2022
10.06 Transaction Monitoring and Reporting	Redacted	<b>Future state TM governance framework</b>  Future state processes outlining TM governance, including TM ML/TF risk coverage, and TM detection strategy design, development, deployment and review processes.	TM governance processes designed and endorsed (new typology, TM detection strategy design, development, deployment and performance review processes).	Complete	Operationalised process to complete ML/TF risk coverage assessment and TM detection strategy design, development, deployment and review processes, evidence of process being used in BAU.	Complete
10.07 Transaction Monitoring and Reporting	Redacted	<b>TM coverage dashboards</b>  Dashboards to support an end to end view of TM coverage and articulate Crown risk-based approach to TM. These dashboards include: TM ML/TF risk coverage, TM data quality/completeness and TM detection strategy effectiveness.	TM coverage dashboards designed and endorsed.	Complete	Dashboards implemented with supporting processes to operationalise dashboard exceptions, endorsed by Transaction Monitoring Council (TMC).	30/06/2022
10.08 AML/CTF Training Implementation	Redacted	<b>Enhanced AML/CTF awareness online module</b>  Minor enhancements to the AML/CTF awareness online module outside the regular training materials review to cover content on vulnerable people in the community.	Relevant training material sections updated and signed off.	Complete	Updated materials uploaded into the online training module.	30/06/2022
10.09 AML/CTF Training Implementation	Redacted	<b>Exec/Senior Management Training</b>  Executives and Senior Management are trained in their obligations and how to discharge oversight obligation (discreet from BU specific targeted training).	Training materials developed and signed off.	Complete	Meeting invites (attendees/delegates) and workshop materials presented.	30/06/2022



		(Linked to Obligations & Controls D6 Cascade FC obligation ownership to relevant businesses)				
10.10 AML/CTF Training Implementation	Redacted	<b>Targeted face to face training content uplift</b>  BU specific training content updates aligned with identified ML/TF risks (EWRA completion) and documented Training Needs Analysis.	Documented approach to identify, prioritise and update BU training content.	30/06/2022	Content updated for targeted training aligned to the latest EWRA and training needs analysis.	30/09/2022
10.11 Customer/ Product Uplift	Redacted	<b>eDVS uplift: Melbourne Customers*</b>  Development and roll out of processes, systems and controls in Melb to perform eDVS for all new customers, as well as high risk customers.	Processes documented and signed off outlining eDVS for new and high risk customers.	Complete	Updates made to operational documentation of impacted teams based on designed and approved eDVS processes.  Evidence of operationalisation of eDVS features, e.g. UAT testing outcomes.	30/06/2022
10.12 Customer/ Product Uplift	Redacted	<b>Occupation code field mandatory</b>  KYC uplift to capture occupation for all new customers. The occupation field to be mandatory to satisfy full membership status.	Detailed requirements provided to IT teams	Complete	Confirmation from IT teams that required updates have been made, including testing outcomes where appropriate.  Updates made to operational documentation of impacted teams as required, reflecting any process changes.	Complete
10.13 Customer/ Product Uplift	Redacted	<b>Citizenship and Place of Birth fields mandatory for new customers (strategic)*</b>  KYC uplift to capture citizenship (up to three) and Place of Birth for all new customers. Fields to be mandatory to satisfy full membership status.	Detailed requirements provided to IT teams	Complete	Confirmation from IT teams that required updates have been made, including testing outcomes where appropriate.  Updates made to operational documentation of impacted teams as required, reflecting any process changes.	30/06/2022
10.14 Financial Crime Obligations and Controls	Redacted	<b>Cascade FC obligation ownership to relevant businesses</b>  Conducting workshops with key stakeholders on cascading of ownership.	Obligation materials developed and signed off.	Complete	Meeting invites (attendees/delegates), workshop materials presented, and signed attendance sheet.	Complete
10.15	Redacted	<b>Thematic Review of Crown Group Bribery &amp; Corruption policy</b>  Thematic review of bribery and corruption risk will include at a minimum	Scope document drafted and signed off.	Complete	Final report drafted and signed off.	29/06/2022

<b>Financial Crime Obligations and Controls</b>		a review of specific risk and controls to detect if breakdown may be occurring.				
<b>10.16 Financial Crime Obligations and Controls</b>	Redacted	<b>Current state assessment of AML/CTF IFTI, TTR, EFTI, UAR and SMR obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	Complete	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	Complete
<b>10.17 Financial Crime Obligations and Controls</b>	Redacted	<b>Current state assessment of AML/CTF customer onboarding, customer due diligence, further KYC and customer monitoring obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	Complete	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	Complete
<b>10.18 Financial Crime Obligations and Controls</b>	Redacted	<b>Current state Assessment of AML/CTF transaction monitoring obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	Complete	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	30/05/2022
<b>10.19 Financial Crime Obligations and Controls</b>	Redacted	<b>Current state assessment of AML/CTF EWRA, customer risk rating, jurisdiction risk rating, product risk rating and channel risk rating obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	30/06/2022	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	31/07/2022
<b>10.20 Financial Crime Obligations and Controls</b>	Redacted	<b>Current state assessment of AML/CTF high and moderate risk roles, training and employee due diligence obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	30/06/2022	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	31/07/2022
<b>10.21</b>	Redacted	<b>Current state assessment of AML/CTF Board &amp; senior management, Program governance,</b>	Process mapping and controls documentation	30/06/2022	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	29/07/2022

<b>Financial Crime Obligations and Controls</b>		<b>AMLCO, compliance report, Independent Review and designated business group obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps				
<b>10.22 Financial Crime Obligations and Controls</b>	Redacted	<b>Current state assessment of enhanced customer due diligence*</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	19/08/2022	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	23/09/2022
<b>10.23 Governance</b>	Redacted	<b>KPOs covering Financial Crime</b>  Mandatory requirement for all staff to complete mandatory training modules including AML. Management to have training-related KPOs (e.g. their staff must have 95% completion rate on mandatory training modules, including AML/CTF).	AML/CTF training-related KPOs designed and signed off.	Complete	Appropriate team working documents updated to reflect changes made.	1/07/2022
<b>10.24 Governance</b>	Redacted	<b>FC&amp;C risk appetite statements*</b>  Clarify Crown's risk appetite statements with respect to financial crime and compliance.	Crown FC&C risk appetite statements documented and signed off by FC&C.	Complete	Crown FC&C risk appetite statements endorsed by an appropriate committee.	30/06/2022
<b>10.25 Governance</b>	Redacted	<b>Continued uplift in use of data to enhance metrics and dashboard reporting</b>  Dashboards to display Financial Crime metrics against Financial Crime Risk Appetite (e.g. Red, Amber, Green (RAG) statuses).	Metrics designed and signed off based on financial crime risk appetite statements.	Complete	Reporting developed based on risk appetite statement metrics designed.  Appropriate testing performed to confirm dashboards are operating as intended.	30/06/2022
<b>10.26 Ongoing Customer Due Diligence</b>	Redacted	<b>OCDD process and capability uplift</b>  Uplift of OCDD process and procedure documentation including capability uplift to strengthen OCDD outcomes (supported by Deloitte engagement).  (linked to PUP D8 Phase 2 – uplifted AML/CTF tranche 2 procedures).	External party (Deloitte) engaged to uplift detailed OCDD procedural documentation.  Recruitment requirements defined based on anticipated volumes across FC Customer Intelligence & Due Diligence.	Complete	Conclusion of engagement with external party through delivery of scope and associated deliverables.  Resourcing requirements approved and recruitment commenced.	30/06/2022
<b>10.27</b>	Redacted	<b>Operationalise periodic ECDD reviews of customers</b>	Designed and approved procedures and WPIs for periodic ECDD reviews.	Complete	Periodic ECDD reviews commenced based on the plan developed.	Complete

Ongoing Customer Due Diligence		Develop procedures and Workplace Instructions (WPI) for ongoing periodic reviews of Crown's high-risk and significant customers, (including execution of ECDD refresh cases). (linked to PUP D8 Phase 2 – uplifted AML/CTF tranche 2 procedures).	Development of a periodic ECDD review plan based on Crown's requirements under the AML/CTF Program.			
10.28 Ongoing Customer Due Diligence	Redacted	<b>Strategy to define KYC refresh*</b> Develop a strategy to support the operationalisation of periodic KYC refresh of customers, in line with requirements under Crown's Joint AML/CTF Program.	Development of a periodic KYC refresh strategy document based on Crown's requirements under the AML/CTF Program.	31/10/2022	N/A - Design only deliverable	N/A
10.29 Governance, Risk and Compliance Tool	Redacted	<b>Vendor selection and onboarding</b> Run RFI process for vendor/ product selection, commercial negotiation and supplier onboarding.	RFI sent to market, responses received.	Complete	Successful candidate decision made and endorsed. Commercial negotiations finalised. Supplier onboarded.	30/06/2022
10.30 Governance, Risk and Compliance Tool	Redacted	<b>Governance Compliance and Risk Tool implementation*</b> Phased deployment of GRC tool into business units including detailed requirements, co-existence and decommissioning approach. (linked to Supplier DD D2 Develop target state and roadmap)	Detailed deployment plan developed and approved, covering phased deployment and decommissioning.	30/06/2022	Evidence of execution of deployment plan.	31/12/2022
10.31 Supplier Due Diligence	Redacted	<b>Map existing Supplier DD process*</b> Conduct a complete mapping process (process flow, technology used, first and second line review) of the source to pay cycle overlying the current procurement risk framework and risk assessment processes to identify gaps, inefficiencies, assess effectiveness of controls and current roles and responsibilities.	Current state processes mapped and signed off.	30/06/2022	N/A - Design only deliverable	N/A
10.32 Supplier Due Diligence	Redacted	<b>Develop target state and roadmap*</b> Conduct gap analysis on current state vs target state. Develop roadmap of enhanced governance, leveraging existing technology and processes	Gap analysis report drafted and signed off.	30/06/2022	N/A - Design only deliverable	N/A



		whilst building a scope for future technology requirements.				
10.33 Policy Uplift Program	Redacted	<b>Policy Uplift Program Phase 1 Plan</b> Complete an uplift across all group policies as an initial draft	Draft the suite of policies, including rationalising existing Crown policies and creating consistency and improve governance and compliance.	Complete	N/A - Design only deliverable	N/A
10.34 Policy Uplift Program	Redacted	<b>Policy Uplift Program Phase 2 Plan</b> Policy design/uplift is completed for suite of Group Policies	Policy Owners to have implemented the new suite of Group Policies, evidencing the four 'implementation pillars' (procedures, critical controls, governance and reporting and communications).	29/03/2023	For each policy, the following 'implementation pillars' are in place:  <ol style="list-style-type: none"> <li>(1) Procedure's approved to operationalise the policy.</li> <li>(2) Design of critical controls to support employee compliance with their obligations under the policy.</li> <li>(3) Governance and reporting elements stood up to support operationalisation of the policy, including ay associated 'policy implementation timeframes'.</li> <li>(4) Initial communication to alert employees of the new or updated policy, including making them aware of changes to employee obligations as a result of the new or updated policy.</li> </ol>	29/03/2023

## DRAFT MELBOURNE REMEDIATION ACTION PLAN (MRAP) - Annexure 4 Other External Work

Last updated: 27 May 2022

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
11.A IFTI / SMR / TTR review	Redacted	Implement the recommendations of PwC and Crown Resorts' work concerning the uplift in Crown's SMR reporting, TTR reporting and/or IFTI reporting - see recommendations below	Complete current state assessment report of Crown's SMR, TTR and/or IFTI reporting.	Complete	Control deficiencies identified in the current state assessment are uplifted.	Complete
11.A.1 IFTI / SMR / TTR review	Redacted	Introduce IFTI detective control	N/A - Implement-only Deliverable	N/A	Detective control is implemented to ensure that copies of IFTI and supporting documentation lodged with AUSTRAC are uploaded to Worksite and are stored for the requisite length of time.	1/08/2022
11.A.2 IFTI / SMR / TTR review	Redacted	Introduce IFTI detective control	N/A - Implement-only Deliverable	N/A	Uplift governance process so that the MLRO is informed of any significant changes made to upstream data that may impact the accuracy and completeness of IFTI, TTR or SMR reporting.	30/09/2022
11.A.3 IFTI / SMR / TTR review	Redacted	Develop review and rationalisation process	N/A - Implement-only Deliverable	N/A	Implement and formalise relevant review and rationalisation process and controls to ensure that any changes made by AUSTRAC to the IFTI, TTR or SMR reportable details (inclusive of file format and associated XML schemas) are appropriately considered and rationalised (for adoption or not) across Crown Resorts	29/07/2022
11.A.4 IFTI / SMR / TTR review	Redacted	Implement user access controls to FC&C Worksite and AUSTRAC Online	N/A - Implement-only Deliverable	N/A	Implement user access controls to FC&C Worksite and AUSTRAC Online and create a list of authorised users to ensure that:  (1) Only employees who require access key to the Crown Melbourne FC&C Worksite and/or AUSTRAC Online are approved and granted access	1/08/2022

					<p>(2) Employees who no longer require access to the Crown Melbourne FC&amp;C Worksite and/or AUSTRAC Online are removed from the authorised users list on a timely basis</p> <p>(3) The list of authorised users for the Crown Melbourne FC&amp;C Worksite and/or AUSTRAC Online is subject to periodic review to ensure accuracy and that it is kept up to date, and this review is documented</p>	
11.A.5 IFTI / SMR / TTR review	Redacted	Investigate SYCO configuration in relation to Telegraphic Transfers	N/A - Implement-only Deliverable	N/A	Complete investigation and uplift SYCO configuration to require unique Employee IDs for Telegraphic Transfers (TTs): SYCO configurations allowing the same Employee ID to be entered in the 'prepBy' and 'authBy' fields when processing an inbound or outbound Telegraphic Transfer (TA or TR).	30/06/2022
11.A.6 IFTI / SMR / TTR review	Redacted	Evidence approvals provided for Early Release of Funds based on the 'Early Release of Funds Approvals Matrix'.	N/A - Implement-only Deliverable	N/A	Requirement for written approval for obtaining all early release of funds approvals prior to release of funds	Complete
11.A.7 IFTI / SMR / TTR review	Redacted	Conduct an enterprise wide review of key financial crime systems ensuring user access levels are correct and appropriate governance is in place	N/A - Implement-only Deliverable	N/A	<p>Undertake an enterprise wide review over key systems utilised within the financial crime ecosystem (e.g SYCO, IGT, LUI etc) across all three properties, to ensure</p> <p>(1) That user access levels and authorities to key systems commensurate with individual roles and responsibilities</p> <p>(2) Appropriate governance over any changes made to critical data including</p> <ul style="list-style-type: none"> <li>- Maintenance of proper audit trail noting who, when and what changes were made to the data and</li> <li>- Mandating user to 'enter' for making changes</li> </ul>	31/08/2022
11.A.8	Redacted	Clarify roles and responsibilities, streamline the IFTI review and	N/A - Implement-only Deliverable	N/A	Roles and responsibilities; and process re design review is complete.	1/08/2022



IFTI / SMR / TTR review		lodgement process and update relevant procedural documentation to reflect roles and responsibilities		<p>Roles and responsibilities are clearly defined between Line 1 function and Line 2 function across all three properties.</p> <p>End to end IFTIs review and lodgement process across the three properties is complete.</p> <p>Relevant procedural documentation is uplifted across all three properties to reflect defined roles and responsibilities.</p>	
11.A.9 IFTI / SMR / TTR review	Redacted	Perform a data lineage exercise to assess compliance with IFTI, TTR and SMR reportable detail requirements, and identify root causes of issues.	N/A - Implement-only Deliverable	N/A	<p>Complete data lineage exercise which assesses Crown's compliance with IFTI, TTR and SMR reportable detail requirements over a reasonable timeframe to provide sufficient comfort (or otherwise) that Crown Melbourne and Crown Perth has provided, and continues to provide, accurate and complete IFTI, TTR and SMR reporting to AUSTRAC. Based on assessment outcomes, identify and address the root causes of any issues noted.</p>
11.A.10 IFTI / SMR / TTR review	Redacted	Conduct feasibility study of using Splunk IFTI Gate	N/A - Implement-only Deliverable	N/A	<p>Complete a feasibility study of using the Splunk IFTI Gate for Crown Melbourne. Should the decision be to implement the IFTI Gate, assess the appropriateness of the existing Sentinel AML Rules configuration to ensure it is fit for purpose prior to the IFTI Gate being deployed into production, and update the Rule configuration as required (whilst ensuring it is consistent across Crown properties to the extent it is practicable)</p>
11.A.11 IFTI / SMR / TTR review	Redacted	Clarify risk position relating to QC checks and update Part A	N/A - Implement-only Deliverable	N/A	<p>Uplift Crown's Part A Program (December 2021 version) based on the advice from Financial Crime Risk in relation to the risk position on QC checks.</p>
11.A.12 IFTI / SMR / TTR review	Redacted	Clarify risk position relating to IT automated reconciliation tool for IFTI reporting and update Part A	N/A - Implement-only Deliverable	N/A	<p>Uplift Crown's Part A Program (December 2021 version) based on the advice from Financial Crime Risk in relation to the risk position on an IT automated reconciliation tool.</p>

11.A.13 IFTI / SMR / TTR review	Redacted	Explore feasibility of SYCO use for primary source of truth for IFTI Transaction data	N/A - Implement-only Deliverable	N/A	Complete feasibility assessment of SYCO use for primary source of truth for IFTI Transaction data and SYCO's relationship to peer systems (i.e. TM 1)	17/03/2023
11.A.14 IFTI / SMR / TTR review	Redacted	Develop a process to ensure full customer name captured upon creation of FINC profile	N/A - Implement-only Deliverable	N/A	Process is in place to ensure the full name of a customer including their full middle name is captured upon creation of a FINC profile	30/06/2022
11.A.15 IFTI / SMR / TTR review	Redacted	Introduce detective control for upload of required TTR documentation on Worksite	N/A - Implement-only Deliverable	N/A	A detective control is in place (e.g. periodic reconciliation of Crown Melbourne TTRs for a given period v AUSTRAC Crown Melbourne TTR lodgement receipts) to ensure that the required documentation has been uploaded to Worksite, and has been stored for the requisite length of time	1/08/2022
11.A.16 IFTI / SMR / TTR review	Redacted	Review FTC listing and remove codes no longer in use	N/A - Implement-only Deliverable	N/A	Cage Management complete the review of the FTCs listing and have removed codes within the FTCs list in 'Patron Financial Transaction' screen for obsolete codes that are no longer in use.	30/06/2022
11.A.17 IFTI / SMR / TTR review	Redacted	Develop a procedure for TTR checks	N/A - Implement-only Deliverable	N/A	Procedure document/checklist created, which outlines the activities and checks undertaken by the Area Manager and Financial Integrity Manager in reviewing cash transactions of \$A 10 000 and above	Complete
11.A.18 IFTI / SMR / TTR review	Redacted	Review and update the 'Table Games Generic SOP' to accurately reflect the current TTR process	N/A - Implement-only Deliverable	N/A	'Table Games Generic SOP' updated to accurately reflect the current process in place.  'Table Games Generic SOP' must adequately outline the step by step activities required  to be performed for processing cash buy ins at a Table Game.	30/06/2022
11.A.19 IFTI / SMR / TTR review	Redacted	Clarify roles and responsibilities, streamline the TTR review and lodgement process and update relevant procedural documentation to reflect roles and responsibilities	N/A - Implement-only Deliverable	N/A	Roles and responsibilities and process re design review is complete and it:  - Clearly defines roles and responsibilities between Line 1	1/08/2022

					<p>function and Line 2 function across all three 3 properties; and</p> <ul style="list-style-type: none"> <li>- Streamlines the end to end TTRs review and lodgement process across the three 3 properties</li> </ul> <p>Relevant procedural documentation is updated across all three 3 properties to reflect defined roles and responsibilities and streamlined process</p>	
11.A.20 IFTI / SMR / TTR review	Redacted	Digitise the Source of Funds (SoF) process	N/A - Implement-only Deliverable	N/A	Complete digitisation of SoF process through the use of a digital interface.	30/06/2022
11.A.21 IFTI / SMR / TTR review	Redacted	Review and update the current TTR Gate Sentinel AML Rules	N/A - Implement-only Deliverable	N/A	Feasibility study of updating the current TTR Gate AML Rules configuration for all three Crown properties is complete and best utilises the detective capabilities offered by Sentinel and Splunk	13/01/2023
11.A.22 IFTI / SMR / TTR review	Redacted	Clarify risk position relating to IFTI QC checks and update Part A	N/A - Implement-only Deliverable	N/A	Financial Crime Risk confirm the risk position relating to IFTI QC checks. Crown's Part A Program (December 2021 version) is updated accordingly	1/08/2022
11.A.23 IFTI / SMR / TTR review	Redacted	Clarify risk position relating to IT automated reconciliation tool for TTR reporting and update Part A	N/A - Implement-only Deliverable	N/A	Financial Crime Risk to further clarify the risk position relating to an IT automated reconciliation tool and update the Crown's Part A Program (December 2021 version) accordingly	1/08/2022
11.A.24 IFTI / SMR / TTR review	Redacted	Amend Investigation and Suspicious Matter Reporting Procedure	N/A - Implement-only Deliverable	N/A	Latest Crown Designated Business Group Investigation and Suspicious Matter Reporting Procedure wording is updated to reflect that a matter should be progressed to investigation based on the circumstances set out in s 3.1.23 of the Procedure	Complete
11.A.25 IFTI / SMR / TTR review	Redacted	Replace the use of CAT spreadsheet with Case Management Tool workflow (i.e. Salesforce)	N/A - Implement-only Deliverable	N/A	<p>The use of CAT spreadsheet is replaced by FC&amp;C Operations with a Case Management Tool workflow (i e Salesforce).</p> <p>Once implemented, the Salesforce environment allows for instant queuing</p>	30/06/2022

					of a T 2 matter once T 1 revise is complete.	
11.A.26 IFTI / SMR / TTR review	Redacted	Develop sample testing framework methodology document for UAR testing	N/A - Implement-only Deliverable	N/A	FCI&S sample testing framework methodology document is complete. The document sets out in greater detail, the factors which inform how the sample monthly UAR NFA dataset is selected for testing.	30/06/2022
11.A.27 IFTI / SMR / TTR review	Redacted	Streamline end-to-end UAR process	N/A - Implement-only Deliverable	N/A	Senior Analyst Operations Planning Performance has undertaken a review of the UAR process to streamline the process.  Features are included such as:  - the 'two-layered' triaging of UARs into High/Medium/Low and subsequently into T1/T2/T3 classifications;  - the use of four (4) variations of No Further Action (NFA) UAR outcome; and  - the storage of risk ratings across several systems.	21/12/2022
11.A.28 IFTI / SMR / TTR review	Redacted	Update the SLA for initial UAR triaging in the SMR Procedure	N/A - Implement-only Deliverable	N/A	SMR Procedure (dated December 2021) is updated and includes wording of the '[triage] by end of next business day' SLA for initial UAR triaging to reflect best practice.	29/07/2022
11.A.29 IFTI / SMR / TTR review	Redacted	Assess the implication of only performing ECDD post SMR Decisioning	N/A - Implement-only Deliverable	N/A	Review of performing ECDD post SMR Decisioning has been conducted and UAR workflow is updated accordingly.	30/06/2022
11.A.30 Other External Expert Work	Redacted	Explore alternative UAR case management tools	N/A - Implement-only Deliverable	N/A	Alternative UAR case management tools are reviewed. AML/CTF workflow tool which is better suited to Crown's needs is implemented.	30/06/2022
11.A.31 IFTI / SMR / TTR review	Redacted	Develop framework and commence annual sample testing and quality control checks over SMR reporting	N/A - Implement-only Deliverable	N/A	(1) SMR Reporting Framework is developed  (2) Annual (at a minimum) sample testing and quality control checks over SMRs submitted is conducted	1/08/2022

					<p>on an ongoing basis to provide comfort that</p> <p>(a) the SMR process is adhered to post SMR decisioning (e.g. updating CMSs, updating risk ratings/entries, complying with record keeping requirements etc) and</p> <p>(b) that the SMR reportable details submitted are accurate (across the three properties, where applicable)</p>	
11.A.32 IFTI / SMR / TTR review	Redacted	Clarify roles and responsibilities, streamline the SMR review and lodgement process and update relevant procedural documentation to reflect roles and responsibilities	N/A - Implement-only Deliverable	N/A	<p>Roles and responsibilities and process are design review has been undertaken and:</p> <ul style="list-style-type: none"> <li>- Clearly defines roles and responsibilities between the Line 1 and Line 2 functions across all three properties</li> <li>- Streamlines the end to end SMRs review and lodgement process across the three properties</li> <li>- Relevant procedural documentation or Workplace Instructions are updated across all three properties to reflect defined roles and responsibilities and streamlined process (including cross referencing document to Chapter 18 AML/CTF Rules requirements for reportable details)</li> </ul>	1/08/2022
11.B.1 IFTI / SMR / TTR review	Redacted	Implement the recommendations of Allens Linklaters' work for Crown concerning an uplift in SMR reporting, TTR reporting and/or IFTI reporting	N/A	N/A	<p>Allens conducted a limited a sample review of 5 SMRs with the requirements in Chapter 18 of the AML/CTF Rules. This report did not contain any recommendations for Crown to action.</p> <p>Further work on SMR reporting continued within Crown Resort's work on the Current State Assessment</p>	Complete
11.B.2 IFTI / SMR / TTR review	Redacted	Implement the recommendations of Allens Linklaters' work for Crown concerning an uplift in SMR reporting, TTR reporting and/or IFTI reporting	N/A	N/A	<p>Work replaced by Crown Resorts' work on the Current State Assessment</p>	Complete



11.B.3 IFTI / SMR / TTR review	Redacted	Implement the recommendations of Allens Linklaters' work for Crown concerning an uplift in SMR reporting, TTR reporting and/or IFTI reporting	N/A	N/A	Work replaced by Crown Resorts' work on the Current State Assessment	Complete
11.C EWRA	Redacted	Implement the recommendations in the ML/TF enterprise-wide risk assessment	See EWRA items below	N/A	See EWRA items below	N/A
11.C.1 EWRA	Redacted	Incorporate the findings of a review of designated services into subsequent ML/TF EWRA's	Engage with Allens to complete underlying work to complete review of the designated services Crown Provides	30/06/2022	(1) Receive and review Allens legal advice (2) Incorporate the findings of a review of designated services into 2022 ML/TF EWRA	30/06/2022
11.C.2.1 EWRA	Redacted	In addition to regular CRAs, Crown could complete regular PRA, ChRa and JRA in response to changes in risk profile, leveraging the ML/TF risk assessments performed in this baseline EWRA. Such risk element assessments are planned in Horizon 2 of the FCCCP milestones for delivery. These future risk element assessments could then appropriately inform future ML/TF EWRA's	Uplifted standalone PRA methodology and process for assessing ML/TF risks before the introduction of a new designated service or at change (as appropriate). Implementation in a suitable solution with detailed data procedures as required.	Complete	Detailed procedures/guidance outlining the operationalisation of each of the risk assessment methodologies through an appropriate rules engine.	29/07/2022
11.C.2.2 EWRA	Redacted	In addition to regular CRAs, Crown could complete regular ChRa in response to changes in risk profile, leveraging the ML/TF risk assessments performed in this baseline EWRA. Such risk element assessments are planned in Horizon 2 of the FCCCP milestones for delivery. These future risk element assessments could then appropriately inform future ML/TF EWRA's	Development and implementation of an uplifted ChRa methodology for assessing ML/TF risks before the introduction of a new channel, or at change (as appropriate). Implementation in a suitable solution with detailed data procedures as required.	30/06/2022	Detailed procedures/guidance outlining the operationalisation of each of the risk assessment methodologies through an appropriate rules engine.	30/09/2022
11.C.2.3 EWRA	Redacted	In addition to regular CRAs, Crown could complete regular JRA in response to changes in risk profile, leveraging the ML/TF risk assessments performed in this baseline EWRA. Such risk element assessments are planned in Horizon 2 of the FCCCP milestones for delivery. These future risk element assessments could then appropriately inform future ML/TF EWRA's	Development and implementation of an uplifted JRA methodology for periodic assessment ML/TF risks associated with jurisdictions. Implementation in a suitable solution with detailed data procedures as required.	30/06/2022	Detailed procedures/guidance outlining the operationalisation of each of the risk assessment methodologies through an appropriate rules engine.	30/09/2022



11.C.3 EWRA	Redacted	<p>Consider evaluating the appropriateness of BU scoping for future EWRA's, in particular:</p> <ul style="list-style-type: none"> <li>- Whether to include Hotels BU.</li> <li>- Separating TG from eTG as standalone in-scope BUs.</li> </ul> <p>Should such descoping be deemed appropriate, the rationale supporting such a request and decision should be clear, documented and submitted to FC&amp;C/FCR and other applicable governance forums for review and approval</p>	Review BUs providing Designated Services during FY22 to include in the 2022 EWRA Report	30/09/2022	2022 EWRA Report	7/12/2022
11.C.4 EWRA	Redacted	<p>Taking into account the significant uplift activities in-flight, consider conducting a subsequent ML/TF</p> <p>EWRA within 12 months of the date of endorsement of this baseline EWRA. Consider reviewing and updating the ML/TF methodology in line with the maturing compliance and operational functions, internal and external factors and consideration of the evolving Group risk framework</p>	Commence 2022 ML/TF EWRA	1/07/2022	Present results of 2022 EWRA to CRL Board	7/12/2022
11.C.5.1 EWRA	Redacted	<p>As part of the ongoing and planned uplift, consideration could be given to the risks associated with higher risk customers and their connections with non-individual parties (such as companies that the customer is involved with and including the industries in which such companies operate) and how these could be considered from a risk assessment perspective.</p>	Uplift of OCDD process and procedure documentation including capability uplift to strengthen OCDD outcomes (supported by Deloitte engagement).	Complete	<p>Conclusion of engagement with external party through delivery of scope and associated deliverables.</p> <p>Resourcing requirements approved and recruitment commenced.</p>	30/06/2022
11.C.5.2 EWRA	Redacted	<p>As part of the ongoing and planned uplift, consideration could be given to the risks associated with higher risk customers and their connections with non-individual parties (such as companies that the customer is involved with and including the industries in which such companies operate) and how these could be considered from a risk assessment perspective.</p>	<p>Designed and approved procedures and WPIs for periodic ECDD reviews.</p> <p>Development of a periodic ECDD review plan based on Crown's requirements under the AML/CTF Program.</p>	Complete	Periodic ECDD reviews commenced based on the plan developed.	Complete

11.C.5.3 EWRA	Redacted	<p>As part of the ongoing and planned uplift, consideration could be given to the risks associated with higher risk customers and their connections with non-individual parties (such as companies that the customer is involved with and including the industries in which such companies operate) and how these could be considered from a risk assessment perspective. Further consideration of the impact of DAB and SK accounts on a customer's risk profile could be assessed including:</p> <ul style="list-style-type: none"> <li>- DAB/SK balance aging and monitoring for balances on deposit for extended periods of time</li> <li>- Deposits and withdrawals or requests for withdrawals of amounts greater than a specified monetary threshold or dormancy period (e.g. no activity for 12 months followed by a withdrawal request)</li> <li>- Detective TM alerts to identify, for example, high value transactions with customers from high risk jurisdictions and high risk product usage linked to high risk customers spend activity over a specified monetary threshold</li> </ul>	Amend return of funds process to identify deposit balances of a certain threshold unused for a set period of time.	Pre-March 2022	Updates made to operational documentation of impacted teams as required, reflecting any process changes.	31/12/2022
11.C.6 EWRA	Redacted	Appointment of an independent party to conduct an Independent Review of the Joint AML/CTF Program (Part A). While not mandated, consideration of Part B review by an Independent Reviewer may be a consideration in future years. The conduct of regular Independent Reviews of the Joint AML/CTF Program will also allow for continuous assessment of the impact of uplifts and the identification of gaps remaining across the AML/CTF risk management environment	Appointment of an independent party to conduct an Independent Review of the Joint AML/CTF Program (Part A).	Complete	Independent Review Report is due to be delivered by Exiger on 31/03/2022	Complete
11.C.7 EWRA	Redacted	Perform a completeness/gap assessment to take into account both those controls which may exist but have	Scoping for current state assessment work by FCCA. See Obligations and	Complete	Current State Assessments across 37 Theme AML/CTF obligations will be completed resulting in the development	30/06/2022

		<p>not been formally documented, and thus considered, and importantly those controls which are currently in development and will be operationalised as part of the FCCCP control environment uplift.</p> <p>Refinement of the controls library to articulate controls at a more granular, BU level to support future controls assessment at a BU level.</p>	<p>Controls FCCCP Charter for more detail on each deliverable.</p>		<p>of the FCCA - Central Approved Control Workbook. See Obligations and Controls FCCCP Charter for more detail on each deliverable.</p>	
11.C.8 EWRA	Redacted	<p>Consider establishing an ML/TF issues and events register to record, monitor and remediate potential and realised ML/TF concerns. This register could consider and include:</p> <ul style="list-style-type: none"> <li>- The processes and procedures for recording and monitoring/reviewing risks and incidents as well as the documentation of remedial actions arising with respect to such incidents</li> <li>- The manner in which remedial actions arising from incidents are aligned with ML/TF actions associated with transaction monitoring alerts or other risk triggers (SPRs)</li> <li>- How the data from such incidents/alerts and supporting remedial actions will be made accessible for use as qualitative components for future ML/TF EWRA's</li> </ul>	<p>Tactical Excel based ML/TF issues and events register to record, monitor and remediate potential and actual ML/TF issues and events.</p> <p>Note: see FCCCP_09_D03 for more detail in relation to long term strategic solution (GRC Tool).</p> <p>Update Financial Crime Regulatory Event Procedures</p>	Complete	<p>Practical implementation of excel based ML/TF issues and events register.</p> <p>Note: see FCCCP_09_D03 for more detail in relation to long term strategic solution.</p> <p>On-going Financial Crime Regulatory Event Forums to review events.</p> <p>Review of FC Events as part of 2022 ML/TF EWRA (1HFY23)</p>	Complete
11.C.9 EWRA	Redacted	<p>Implement a digital risk assessment tool that will enhance the efficiency of the ML/TF EWRA process in future years, providing benefits through a centralised, scalable and auditable platform</p>	<p>Discussions being held with potential vendors. In the absence of a stand alone ML/TF Risk Assessment digital tool Crown will look at the options provided by GRC vendors or alternatively rely on manual excel based tool for 2022 ML/TF EWRA until a fit for purpose digital solution can be implemented.</p>	30/06/2022	<p>Utilisation of stand alone ML/TF Risk Assessment digital tool for 2022 ML/TF EWRA (or alternatively rely on manual excel based tool for 2022 ML/TF EWRA until a fit for purpose digital solution can be implemented.)</p>	30/08/2022
11.C.10 EWRA	Redacted	<p>Continue training and awareness sessions with respect to ML and TF risks, and the vulnerabilities inherent in</p>	<p>Updated Targeted ML/TF Risk Awareness Training Material</p>	30/06/2022	<p>Roll out of updated ML/TF Risk Awareness Training Materials</p>	From 01/07/2022

		products and services (such as the recently established Financial Crime Working Group forum). These measures should not be limited to operational front- line staff (who have demonstrated high levels of ML/TF training engagement and completion) but to non-FC&C management (ExGM and GM) levels and in particular back office functions				
11.C.11 EWRA	Redacted	Implement a two way communication at Financial Crime Working Group forum on addressing ML/TF risks and vulnerabilities	First FCWG Meeting	Complete	Ongoing FCWG meetings (at least 10 per year)	Ongoing

## DRAFT MELBOURNE REMEDIATION ACTION PLAN (MRAP) - Annexure 5 Responsible Gaming

Last updated: 10 June 2022

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
17.A Training	Redacted	Implement enhanced RG Training	<p>RG training, policy and procedures are designed to include guidance on positive employee behaviours and outlines the expectations of leaders to role model desired behaviours in support of responsible gaming practices. It also provides support to leaders.</p> <p>The objective of the RG training, policy and procedures is to improve responsible gaming outcomes for customers (such as improved psychological safety), enabling positive culture reform.</p>	31/07/2022	<p>Roll out the standardised and advanced training as evidenced by attendance records.</p> <p>This is covered by four levels of training, from top to lower tiers of the Crown team.</p>	30/09/2022
17.A Training	Redacted	Implement enhanced RG Training for RG Team	Current Crown RG staff training is assessed and opportunities identified for enhancements, including mental health training. The assessment is summarized in a recommendations paper.	31/07/2022	Implement RG staff training enhancements Development of a recognized course accreditation for RG staff	31/12/2022
17.A Training	Redacted	Implement enhanced RG Training for Other Relevant Staff	<ol style="list-style-type: none"> <li>Assess adequacy of existing RG training for non-RG employees who work on the gaming floor and identify opportunities for uplift</li> <li>Based on the assessment uplift, if necessary, the broader RG training across gaming and security staff, focusing on customer health and wellbeing resulting in sustainable customer experiences that prevent and minimize harm, psychology principles, ethics to empower cultural reform, unique approaches to CALD and vulnerable customers</li> </ol>	31/07/2022	Implement broader RG training enhancements	31/12/2022
17.A Training	Redacted	Develop Employee Communications Program	<ol style="list-style-type: none"> <li>Identify opportunities for employee communications</li> <li>Develop employee communication program that provides frequent,</li> </ol>	30/06/2022	Implement employee communications program	30/09/2022



			robust reminders of the importance of managing harm			
17.B Resources	Redacted	Assess RG Resources Capacity and Capability	<ol style="list-style-type: none"> <li>(1) Assess the outcomes of the VRC to understand impact on RG staffing</li> <li>(2) Assess the implications of the RGCP on RG team capacity Note: assumption it does not require external assessment, or 3<sup>rd</sup> party involvement</li> </ol>	31/07/2022	Formulate strategic plan for ongoing RG resourcing	30/09/2022
17.B Resources	Redacted	Establish RG KPIs and update PDs	<ol style="list-style-type: none"> <li>(1) Establish/ Implement KPIs for applicable Line 1 employees</li> <li>(2) Establish/ Implement KPIs for applicable Line 2/3 employees</li> <li>(3) Assess and update PDs for applicable line 1 employees</li> <li>(4) Assess and update PDs for applicable line 2/3 employees</li> </ol> <p>Note: based on assumption only for RG employees</p>	30/06/2022	<ol style="list-style-type: none"> <li>(1) Roll out KPIs for applicable Melbourne Line 1 employees (evidence of communications)</li> <li>(2) Roll out KPIs for applicable Melbourne Line 2 RG team members (evidence of communications)</li> <li>(3) Roll out uplifted PDs for applicable line 1 job families (evidence of updated PD's for the job family and communication to employees)</li> <li>(4) Roll out uplifted PDs for applicable line 2/3 employees (evidence of updated PD's and communication)</li> </ol>	31/12/2022
17.C Funding	Redacted	Report on CMLs RG Program Funding	Ongoing obligation	N/A	Periodically review CMLs responsible service of gambling program budget through resourcing reports focused on Financial Crime within CML	31/12/2023
17.D Services	Redacted	Research and develop an RG identification program	<ol style="list-style-type: none"> <li>(1) Identify third party provider (Focal Research) to conduct research and develop a tool that focuses on gambling related harm in the context of uncarded play, with primary focus EGMs.</li> <li>(2) Execute contract</li> <li>(3) Provide required data</li> </ol>	Complete	<p>Evidence that 3rd party has conducted research and develop a tool for assessing harm from gambling.</p> <ol style="list-style-type: none"> <li>(4) Review initial output</li> </ol>	30/09/2022
17.D Services	Redacted	Explore availability of existing risk assessment tools and program	<ol style="list-style-type: none"> <li>(1) A scan is undertaken of <ul style="list-style-type: none"> <li>- third party risk assessment tools and programs addressing gaming related harm</li> <li>- internal Crown risk assessment tools outside of RG.</li> </ul> </li> </ol>	31/08/2022	Evidence that appropriate risk assessment tools have been identified and implemented based on recommendations identified in the internal and external market scan.	TBC  [Deliverable will have a dependency of external provider of choice and



			(2) Documented in a recommendations paper.		The implementation of this deliverable will have a dependency of external provider of choice and tech roll out	technology roll out]
17.D Services	Redacted	Assess communication methods	A document is produced assessing the viability of message delivery (under the communications plan): - via EGMs/ ETGs/ ATMs - via alternative channels	30/06/2022	If appropriate solutions identified, evidence that a digital messaging system delivery solution on ETGs/ATMs is designed and implemented.  Implementation of this deliverable will have dependencies on the findings from the design phase incl. budget, complexities of tech functionality and features	TBC  [Deliverable will have dependencies on the findings from the design phase including budget, complexities of technology functionality and features]
17.D Services	Redacted	Develop communications plan to drive engagement across all customer segments	(1) Design communications plan that drives engagement across all customer categories (2) Design specific communications under plan	30/06/2022	Evidence of delivery of communications under the plan.	30/09/2022
17.D Services	Redacted	Design content for RG Websites promoting harm minimisation communications	(1) Design new RG content for websites (2) Engage external review of content	Complete	New RG content is launched on Crown Resorts website.	Complete
17.D Services	Redacted	Conduct research into evidence-based play periods	(1) Current research is consolidated and assessed relating to what play periods are appropriate for Crown for future enhancement of (2) the RG framework (3) Crown begins to explore how it may procure or undertake additional play period research	31/08/2022	Evidence of exploration of additional research	31/12/2022
17.D Services	Redacted	Define RG Customer Relationship Management (CRM)	(1) Identify potential CRMs that can be used for responsible gaming. (2) Select the CRM tool (expected to be Salesforce).	Complete	(1) Execute contract with technology provider. (2) Pilot CRM and assess results. (3) Implement CRM across gaming floor and RG staff including training.	31/12/2022
17.D Services	Redacted	Conduct a Referral Process review	(1) A paper is produced assessing the adequacy of Crown's current referral processes, based on available data	31/08/2022	Pursuit opportunities for uplift as outlined in the recommendations paper  Implementation will be dependent on cooperation with external services	TBC  [Implementation will be dependent on cooperation with external services]

			(2) A recommendations paper summarizes opportunities to uplift the referrals processes at Crown			
17.D Services	Redacted	Assess the referral network	(1) The breadth and quality of Crown's current referral network is assessed and summarized in a paper (2) A recommendations paper is produced on opportunities for enhancements, or change to the referral network	31/08/2022	(1) An implementation plan is developed to action the recommendations relating to third party referrals. (2) The actions are delivered in accordance with the implementation plan.	TBC  [Implementation will be dependent on cooperation with external services]
17.D Services	Redacted	Assess Translator capability	A document is developed which: - reviews Crown's current translation capabilities and approach; - investigates the potential for a national translator provider; - provides recommendation on these matters	30/06/2022	An implementation plan is developed to action the recommendations on translation services, including the appointment of a national translation service provider if available/appropriate.	30/09/2022
17.D Services	Redacted	Uplift RG Reporting	Identify opportunities for immediate improvements to RG reporting based and design an improved RG reporting template	Complete	(1) Evidence that RG reporting has been enhanced to include customized dashboards and metrics based on improvements identified. (2) Introduce tailored RG dashboard reporting using enhanced metrics.	30/09/2022
17.E Self Exclusion Program	Redacted	Uplift processes for monitoring revocation customers	A recommendations paper is produced assessing: - current Crown processes relating to monitoring exclusions - the recommended design of a uniform approach for Sydney, Melbourne and Perth	31/07/2022	Implement updated approach across Crown Melbourne	30/09/2022
17.E Self Exclusion Program	Redacted	Investigation options for Means to Exclude	(1) Investigate channel options for all exclusion programs, including digital processes (2) Ensure all channels respect privacy laws in all jurisdictions (3) Engage with external bodies to assess exclusion channels	31/07/2022	Implement alternative exclusion channels by: (1) Paper outlining results of investigations (2) Evidence of engagement of external bodies	31/12/2022

17.E Self Exclusion Program	Redacted	State-wide Exclusion Register	<p>The below is dependant on government design and approval.</p> <ul style="list-style-type: none"> <li>- Create a state-wide exclusion register in the states in which Crown operates, as applicable. This includes:</li> <li>- Self Exclusion</li> <li>- Third Party Exclusion</li> <li>- This will be dependent on agreement with other industry participants and privacy considerations, among other complexities.</li> <li>- A staged approach starting with an Australasian Casino Self Exclusion Program to be proposed.</li> </ul>	30/09/2022	Subject to ongoing government consultation & dependent on agreement with other industry participants	TBC
17.F May 2021 RG Enhancements	Redacted	Cease Crown Rewards Members Bingo	<ol style="list-style-type: none"> <li>(1) Prepare Responsible Gaming Committee Memorandum proposing the ceasing of the Bingo offering;</li> <li>(2) Cease Bingo offering for Crown Rewards members at Crown Melbourne;</li> <li>(3) Submit the RG Enhancements which includes the ceasing of Bingo offering to the Victorian Royal Commission</li> </ol>	Complete	Program ceased	Complete
17.F May 2021 RG Enhancements	Redacted	Cease Bus/Red Carpet Program	<ol style="list-style-type: none"> <li>(1) Cease Crown Melbourne 'Red Carpet Program', offered community groups.</li> <li>(2) Cease transport (by Bus) for groups of members to Crown Melbourne.</li> <li>(3) Cease offering participants food and beverage and potentially funds toward the bus hire.</li> </ol>	Complete	Program ceased	Complete
17.F May 2021 RG Enhancements	Redacted	Replacement of Crown Rewards Promotional Gaming Vouchers	Crown will replace gaming vouchers on signing up to the Crown Rewards Program with a non-gaming/promotional voucher instead.	Complete	Gaming vouchers phased out	Complete
17.F May 2021 RG Enhancements	Redacted	Review of Crown Rewards Loyalty Program	The Chief Customer & Digital Officer, with assistance from the Group EGM of Responsible Gaming, are making final adjustments to scope, hypotheses set	31/07/2022	Comprehensive analysis, reporting and recommendations in relation to Responsible Gaming and the Loyalty Program for Melbourne to be completed	31/03/2023

			and questionnaire design, for research in relation to the Loyalty Program being conducted by the engaged external consultant, and with the additional assistance of the Responsible Gaming Advisory Panel and PRET Solutions. COVID and property closures, and resultant impact on gambling behaviours, forced a delay in start dates to ensure study effectiveness.		by the external consultant and handed to Crown. Actions to be established once the recommendations are reviewed by Crown.	
17.F May 2021 RG Enhancements	Redacted	Enhanced RG functionality within cashless gaming	<p>(1) ATMs are placed no closer than 50m from the gaming floor for Crown Melbourne. [Complete]</p> <p>(2) Note acceptors will not allow for more than \$500 cash to be inserted at any one time in respect of uncarded play. With the exception of one older game theme. [Yet to be complete]</p> <p>(3) An enterprise approach is contemplated by the Crown Resorts Digital Payment Steering Committee in consultation with relevant parties. [Underway]</p> <p>Cashless gaming is unknown as plan to roll out mandatory carded play will satisfy item (2) - timeline of this roll out is unknown and has a large dependency</p>	TBC  [Timeline of this roll out is yet to be determined as it has a large dependency on group-wide rollout]	Implementation is in discussion as this item is linked to Tranche 2.	Subject to ongoing government consultation
17.F May 2021 RG Enhancements	Redacted	Member Benefit Controls	<p>(1) Controls are in place to ensure that direct to member offers do not require customers to exceed historical behaviours (spend or visit frequency) in order to get their first benefit.</p> <p>(2) Updated gaming marketing and promotions reviewed and approved by Legal, Compliance and Responsible Gaming</p>	Complete	Updated gaming marketing and promotions are rolled out throughout CML	Complete
17.F May 2021 RG Enhancements	Redacted	Acquire a diversity of RG staff	<p>(1) Seek internal approval for positions, create job descriptions for additional Responsible Gaming Advisors, with priority given to those from Culturally and Linguistically Diverse (CALD) backgrounds including language skills that are underrepresented in the staff profile</p>	Complete	Finalise recruitment for additional Responsible Gaming Advisors.  Additional Responsible Gaming Advisors to commence employment at Crown. Cease job advertisements.	Complete



			<p>but overrepresented in persons experiencing harm from gambling.</p> <p>(2) Post job advertisements</p> <p>(3) commence interview process.</p>			
<p><b>17.G</b></p> <p><b>Gambling Code and Play Periods Policy</b></p>	Redacted	Implement domestic time limits on play	<p>(1) Amend daily visit policy to reflect the new play periods for domestic players playing at Gaming Machines, Table Games and Electronic Table Games. Amended play periods for domestic customers are as follows: 12 hours in a 24 hour period with observation/intervention at 3.5, 6, 8, 10 and 12 hours. Customers will not be able to play for more than 48 hours in a week.</p> <p>(2) Amend customer pamphlets to state the 48 hour play limits per week;</p> <p>(3) Update advertising on the property to reflect the updated play periods;</p>	Complete	<p>(1) Training provided to all table games managers and above on the 12 hour and 48 hour play period policy;</p> <p>(2) Training provided to managers and above gaming machine staff on updated play periods;</p> <p>(3) Training provided to domestic sales team;</p> <p>(4) Training provided to a number of teams including the hosting team at Mahogany, player welfare team and responsible gaming team.</p>	Complete
<p><b>17.G</b></p> <p><b>Gambling Code and Play Periods Policy</b></p>	Redacted	Implement international time limits on play	<p>Potential design closure criteria to be confirmed:</p> <p>Crown introduces the following time limits on playing at Gaming Machines, Table Games and Electronic Table Games:</p> <ul style="list-style-type: none"> <li>- International Parameters to be determined Possible Parameters for Premium Program Players – staying less than seven days – 18 hours in a 24 hour period with interventions at hours 12, 14 and 16. Players staying for longer than 7 days would align with Domestic Player limits.</li> </ul> <p>This requirement may no longer be relevant as there are plans to mirror international time limits with domestic</p>	30/09/2022	<p>(1) Training provided to all table games managers and above on the international play period policy;</p> <p>(2) Training provided to managers and above gaming machine staff on updated play periods;</p> <p>(3) Training provided to international sales team;</p> <p>(4) Training provided to a number of teams including the hosting team at Mahogany, player welfare team and responsible gaming team.</p>	31/12/2022
<p><b>17.G</b></p> <p><b>Gambling Code and Play Periods Policy</b></p>	Redacted	Implement YourPlay (Victoria) recommendations	Engage with the VGCCC to understand their intentions regarding Recommendation 10 and to offer assistance	Subject to ongoing government consultation	Develop strategy to deliver mandatory play periods Implement mandatory play periods/time limits/breaks in play	Subject to ongoing government consultation

			Assess the potential impact of mandatory play periods			
<b>17.G Gambling Code and Play Periods Policy</b>	Redacted	Conduct research for evidence-based Play Periods	Consolidate and further explore play period research Conduct analytics on available data re play periods  propose to remove as already addressed in Play Period Research deliverable in 17.D	30/09/2022	Implement changes based on research and analytics	31/12/2022
<b>17.G Gambling Code and Play Periods Policy</b>	Redacted	Assess efficacy of changes to play periods	Using data analytics, assess the efficacy of changes to play periods/time limits/breaks in play and time-outs and amend the approach as needed  propose to remove as already addressed in Play Period Research deliverable in 17.D	30/12/2022	Share data with external parties, including regulators	15/03/2023



## DRAFT MELBOURNE REMEDIATION ACTION PLAN (MRAP) - Annexure 6 Compliance

Last updated: 10 June 2022

Appendix I Ref	Project Sponsor / Delivery Lead	Deliverable	Design Closure Criteria	Design Closure Date	Implementation Closure Criteria	Target Date
18.1 Financial Crime Obligations and Controls	Redacted	<b>Design and finalise Melbourne obligations for Gaming</b>  Legislative sources mapping, defining obligations, including socialising and finalising obligations.	Socialised and finalised drafting of Crown's obligations.	Complete	Approval of Obligations Register	1/06/2022
18.2 Financial Crime Obligations and Controls	Redacted	<b>Design and finalise Crown's Responsible Gaming obligations</b>  Legislative sources mapping, defining obligations, including socialising and finalising obligations.	Socialised and finalised drafting of Crown's obligations.	Complete	Approval of Obligations Register	Complete
18.3 Financial Crime Obligations and Controls	Redacted	<b>Current state Assessment of casino Control and gambling Melbourne obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	31/12/2022	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	31/03/2023
18.4 Financial Crime Obligations and Controls	Redacted	<b>Current state assessment of Responsible Gaming obligations</b>  Process mapping, controls design effectiveness assessment, and identification of controls gaps	Process mapping and controls documentation	26/11/2022	Controls design effectiveness assessment outcomes and associated controls gaps as identified.	31/03/2023

## Glossary

Term	Description
*	Indicative timeframes that may be subject to vendor technical requirements/timelines, and internal technology/data prioritisation
<b>AML CTF</b>	AML/CTF means Anti-money laundering and counter-terrorism financing.
<b>Appendix I</b>	Appendix I refers to Appendix I in the Royal Commission into the Casino Operator and Licence, the Report - Volume 1.
<b>Casino Agreement</b>	Casino Agreement means the agreement between the regulator (then known as the Victorian Casino Control Authority) and Crown Melbourne (then known as Crown Casino) on 21 September 1993 as amended from time to time.
<b>Complete</b>	Complete is a Target Date status that means the deliverable is complete.
<b>Crown Melbourne</b>	Crown Melbourne means Crown Melbourne Limited.
<b>DAB</b>	DAB means deposit account balance.
<b>Design</b>	<p>Artefacts or activities ("deliverables") to be delivered are designed and developed with Subject Matter Expertise (SME) and stakeholder input to ensure they meet regulatory requirements (where appropriate) and are fit for purpose for Crown Melbourne.</p> <p>Agreement on how and when the deliverables will be implemented within the business.</p> <p>Formal approval or acceptance of the final deliverables by the Accountable Lead and/or governance forum (e.g. Crown Melbourne Board).</p>
<b>Design Closure Criteria</b>	<p>Potential closure criteria to confirm delivery:</p> <ul style="list-style-type: none"> <li>- Evidence of assessment of the artefact against regulatory or better practice requirements, informed by prior incidents, weakness or issues</li> <li>- Evidence of SME/stakeholder input to ensure the solution will work for Crown's business.</li> <li>- Production of final draft ready for implementation</li> <li>- Acceptance and approval to implement by Accountable Lead / Governance Forum</li> </ul>
<b>IFTI</b>	IFTI means international funds transfer instruction.

<b>Implementation</b>	<p>All actionable items completed and all deliverables rolled out and operationalised (including training and awareness as required). Must be linked to an enhancement in people, process/controls, documentation, technology and/or governance.</p> <p>Agreement on how the deliverables will be embedded within the business, including ongoing monitoring, oversight and continuous improvement. Where appropriate, dates and responsibility for ongoing / regular reviews or reporting should also be defined.</p>
<b>Implementation Closure Criteria</b>	<p>Potential closure criteria to confirm delivery:</p> <ul style="list-style-type: none"> <li>- Board paper and minutes of meeting.</li> <li>- Training plan or communication collateral.</li> <li>- Amendment of policies or procedures to implement the enhancement to the business.</li> </ul>
<b>Management Agreement</b>	<p>Management Agreement means the agreement between the State and Crown Melbourne (then known as Crown Casino) on 20 April 1993 as amended from time to time.</p>
<b>MRAP</b>	<p>Melbourne Action Remediation Plan</p>
<b>OSM</b>	<p>OSM means Office of the Special Manager.</p>
<b>RCCCOL</b>	<p>RCCCOL means Royal Commission into the Casino Operator and Licence, the Report.</p>
<b>SMR</b>	<p>SMR means suspicious matter report.</p>
<b>TTR</b>	<p>TTR means transaction threshold report.</p>

