

CROWN RESORTS LIMITED

Whistleblower Policy

Crown Resorts Limited ACN 125 709 953



TABLE OF CONTENTS

PAGE

1. DOCUMENT CONTROL	1
2. DEFINITIONS	2
3. POLICY OVERVIEW	4
4. POLICY	5
5. POTENTIAL BREACH CONSEQUENCES	17
6. CONTINUOUS IMPROVEMENT	17
7. REPORTING TO THE RISK, COMPLIANCE AND PLAYSAFE COMMITTEE	18
8. ROLES & RESPONSIBILITIES	19
9. POLICY REVIEW AND APPROVAL	21
10. FEEDBACK AND QUESTIONS	21
11. RELEVANT LEGISLATION, REGULATIONS AND OTHER GUIDANCE DOCUMENTS	22
12. RELEVANT CROWN POLICIES AND DOCUMENTS	22
APPENDIX A: VERSION CONTROL	23

1. DOCUMENT CONTROL

Policy Title	Crown Resorts Limited – Whistleblower Policy
Policy Owner	Group General Manager, Compliance & Regulatory Affairs
Accountable Executive	Group General Counsel & Company Secretary
Summary	This Policy encourages the reporting of misconduct and wrongdoing. It is important that all individuals who are aware of any such wrongdoing at Crown should have the confidence to speak up without fear of detriment. This Policy sets out how disclosures can be made and the protections that are available to Eligible Whistleblowers under Australian law.
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Review Frequency	Every 2 years
Approving Body	Crown Resorts Limited Board

2. DEFINITIONS

Australian Law means the provisions of the Corporations Act 2001 (Cth) (Corporations Act) and the Tax Administration Act 1953 (Cth) (Tax Act) which provide certain protections for Eligible Whistleblowers.

Crown means Crown Resorts and the companies described in the Crown Group.

Crown Group means the following majority owned Australian subsidiaries of Crown Resorts and any related body corporate:

- (a) Crown Melbourne Limited (Crown Melbourne);
- (b) Burswood Nominees Limited (Crown Perth);
- (c) Crown Sydney Gaming Pty Ltd and Crown Sydney Property Pty Ltd (collectively, Crown Sydney).

Crown Resorts means Crown Resorts Limited (ACN 125 709 953).

Disclosable Matter means a disclosure of information from an eligible whistleblower who has reasonable grounds to suspect that the information concerns: misconduct, an improper state of affairs or circumstances, a breach of the law, or danger to the public or the financial system.

Eligible Recipient means those entities and individuals defined under this Policy who may receive whistleblower disclosures.

Eligible Whistleblower means those individuals defined under this Policy who are entitled to make whistleblower reports in relation to Crown.

Employee Assistance Program (EAP) means the service appointed by Crown to provide counselling and wellbeing services to Crown employees and their immediate families.

Executive means a person other than a director or secretary of Crown who makes or participates in making decisions that affect the whole or substantial part of Crown or has the capacity to significantly affect Crown's financial standing. For the purposes of this policy, this means members of Crown Resorts' Executive Committee.

Protected Disclosure means a disclosure made about a Disclosable Matter by an Eligible Whistleblower to an Eligible Recipient. Protected Disclosures give the whistleblower rights and protections under Australian Law.

Sensitive Matter means a Disclosable Matter that is treated differently to other disclosable matters due to:

- the nature of the report, and relates to a Director, Executive, a direct report of a CEO within a property of Crown Group, a Whistleblower Committee Member or the Whistleblower Protection Officer; or
- the allegations made within the report involve serious reputational or criminal elements, high profile person/s named within the report, or the risk of serious reputational damage arising as a result of the report.

Team Member means any person performing duties on behalf of Crown, whether directly employed or contracted by Crown and includes directors and officers and permanent, fixed-term, temporary, volunteer, full-time, part-time and casual employees of Crown or agency workers.

Whistleblower Committee means the committee established to receive, assess, investigate, remediate and govern disclosures made under this Policy.

Whistleblower Protection Officer (WPO) means the role held by the Group General Manager – Compliance & Regulatory Affairs who is responsible for the best interests of a person who makes a protected whistleblower disclosure

Whistleblower Secretariat provides support to the WPO and the Whistleblower Committee in arranging meetings, managing reports and liaising with reporters and Eligible Whistleblowers.

Workplace Issue means a grievance, concern, problem, or complaint that an employee has about their work, the workplace, or someone they work with.

3. POLICY OVERVIEW

3.1 PURPOSE OF POLICY

The purpose of this Policy is to ensure that all individuals who are aware of misconduct or wrongdoing at Crown can have the confidence to speak up without fear of detriment.; and set out how disclosures can be made and the protections that are available to Eligible Whistleblowers under Australian law.

Crown may exercise its discretion to address non-Protected Disclosures in accordance with this Policy.

3.2 SCOPE AND APPLICATION OF POLICY

An Eligible Whistleblower may make a disclosure under this Policy if the Eligible Whistleblower is based in Australia, or the Disclosable Matter relates to Crown's Australian operations.

This Policy applies to Crown Resorts Limited and its subsidiaries over which it exercises control (Crown).

It may also apply more broadly however this Policy must be considered in conjunction with the laws of any other relevant country. To the extent the local laws are inconsistent with this Policy, the local obligations will prevail over this Policy.

3.3 ADHERENCE TO REGULATOR APPROVED DOCUMENTATION

Where this Policy conflicts with or does not cover requirements contained within Regulated Casino Documents, the Regulated Casino Documents should be adhered to in all instances of conflict or omission.

3.4 POLICY ALIGNMENT TO CROWN CODE OF CONDUCT AND VALUES

This policy has been written to align to the Crown Values, and with the intent to promote the behaviours and mindsets that will embed our culture. The table below summarises some of the key areas of alignment for this policy.

Value	Alignment
We act with integrity	<i>This Policy is a practical tool to encourage the reporting of misconduct and wrongdoing. It is important that all individuals who are aware of any such wrongdoing at Crown should have the confidence to speak up without fear of detriment.</i>
We care	<i>This Policy ensures individuals are protected from detriment should they make a Protected Disclosure.</i>
We work together	<i>This Policy ensures relevant areas of Crown participate in the whistleblower management process through either permanent or temporary membership of the Whistleblower Committee. Relevant skills and expertise within Crown that will assist in the management of a whistleblower disclosure can be engaged at the Whistleblower Committee's discretion.</i>

4. POLICY

4.1 BACKGROUND

Policy sets out how Crown will deal with a protected disclosure. For a disclosure to be protected under Australian Law it must meet three requirements:



4.2 ELIGIBLE WHISTLEBLOWER

An Eligible Whistleblower at Crown is *any* individual that is, or has been, any of the following:

- a) a current or former Team Member of Crown (e.g. permanent, part-time, fixed-term or temporary, interns, secondees and managers);
- b) a person who supplies goods or services to Crown (whether paid or unpaid), and employees of those suppliers (e.g. current and former contractors, consultants, service providers and business partners);
- c) an officer or associate of Crown (e.g. a director or secretary of Crown); or
- d) a relative, dependent or a dependent of the spouse of any individual referred to in paragraphs (a) to (c) above.

4.3 ELIGIBLE RECIPIENTS

An Eligible Whistleblower may report their concerns to specific individuals within Crown or to Core Integrity. These individuals are called Eligible Recipients.

4.3.1 Core Integrity

Eligible Whistleblowers are encouraged to contact Core Integrity, to make a disclosure under this Policy. Core Integrity is an independent and confidential service which is available 24 hours a day, seven days a week. Core Integrity's contact details are set out below:

Method	Details
Phone	1800 305 796
Email	CrownSpeakUp@coreintegrity.com.au
QR Code	

URL	qrs.ly/CrownSpeakUp
Mail	Attention: Crown Speak Up PO Box 730 Milsons Point NSW 1565

4.3.2 Other Eligible Recipients

In addition to Core Integrity, the following individuals may receive disclosures directly in accordance with this Policy:

- an Officer (including a director or company secretary) or Executive of Crown;
- an external auditor of Crown, or a member of the internal audit team of Crown;
- the Whistleblower Protection Officer;
- the Whistleblower Secretariat;
- the Money Laundering Reporting Officer;
- the Anti-Bribery and Corruption Officer; or
- any member of the Whistleblower Committee, (each an Eligible Recipient) refer section 4.8.1.

The above Eligible Recipients may be contacted by calling +61 3 9292 8888. Contact details of the Eligible Recipients referred to above are available on Crown's intranet. If email is the preferred mode of communication, Eligible Whistleblowers are encouraged to email the whistleblower.protection.officer@crownresorts.com.au.

Eligible Recipients are required to refer disclosures to the Whistleblower Committee Chair or Whistleblower Protection Officer but must maintain anonymity and confidentiality requirements.

Additional Eligible Recipients include:

- a legal practitioner (other than a legal practitioner employed by Crown) for the purpose of obtaining legal advice or legal representation in relation to the operation of the protections available under Australian Law;
- the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA) or a prescribed Commonwealth authority (for the purposes of the Corporations Act); or
- in relation to a tax-related Disclosable Matter, the Commissioner of Taxation, a registered tax or BAS agent who provides tax agent or BAS services to Crown, or a Team Member or officer of Crown who has functions or duties that relate to the tax affairs of Crown (for the purposes of the Tax Act).

4.4 Disclosable Matter

A Disclosable Matter includes suspected or actual misconduct, or an improper state of

affairs or circumstances, in relation to Crown. This includes (but is not limited to) information that a Team Member or officer of Crown has:

- engaged in conduct that contravenes or constitutes an offence against certain legislation (including the Corporations Act or the ASIC Act);
- constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- represents a danger to the public or the financial system.

Eligible Whistleblowers must have reasonable grounds to suspect the information they are reporting is true but will still qualify for protection and will not be penalised even if the information turns out to be incorrect. However, Eligible Whistleblowers must not make a report that they know is not true or is misleading. If an Eligible Whistleblower knowingly makes a false report, this will be considered a serious matter and may result in disciplinary action.

4.4.1 Examples of Disclosable Matters

Some examples of Disclosable Matters in relation to Crown include:

- criminal activity;
- conflicts of interest;
- fraud, negligence, default, breach of trust or breach of duty;
- a breach of laws, regulations or any legal obligation by Crown or by any officer or Team Member of Crown, including suspected or actual money laundering, misappropriation of funds, offering or accepting a bribe or a contravention of human rights;
- conduct that relates to dishonest or unethical behaviour and practices;
- business behaviour and practices that may result in serious or significant consumer harm;
- a systemic issue that the relevant regulator should know about;
- a serious breach of Crown's Code of Conduct and its Policies;
- information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system (even if it does not involve a breach of a particular law);
- information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Crown or an associate, which the Team Member considers may assist the recipient to perform functions or duties in relation to the tax affairs of Crown or an associate; or
- conduct that relates to detriment, or threat of detriment, to the Eligible Whistleblower (as set out under section 4.9.2 of this Policy.
- conduct that contravenes or constitutes an offence against the Corporations Act or the Australian Securities and Investments Commission Act 2001;
- conduct that constitutes an offence against any law of the Australian Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- conduct that represents a danger to the public or the financial system;

In general, a Disclosable Matter does not include a Workplace Issue unless an exception applies.

4.5 Workplace Issue

A disclosure relating to a Workplace Issue does not qualify for protection under the Australian Law when the matter:

- concerns a grievance about any matter in relation to the Eligible Whistleblower's current or former employment with Crown, having (or tending to have) implications for the Eligible Whistleblower personally (such as an interpersonal conflict, a decision relating to the engagement, transfer or promotion of the Eligible Whistleblower, and disciplinary action including suspension or termination of employment);
- does not have any significant implications for Crown; and
- does not constitute an offence against certain legislation, an offence against legislation punishable by imprisonment for a period of 12 months or more, or does not represent a danger to the public or the financial system.

A Workplace Issue may qualify for protection under the Australian Law if it:

- relates to detriment that has been suffered or is threatened because an individual has raised a concern about a suspected Disclosable Matter;
- relates to both a Workplace Issue and a Disclosable Matter; or
- relates to concerns that Crown has breached certain laws or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or information that suggests misconduct beyond the Eligible Whistleblower's personal circumstances.

Workplace Issues that are not Disclosable Matters should be raised with the individual's People Leader or another People Leader or a member of Crown People & Culture team. If the individual is unsure of whether the Workplace Issue constitutes a Disclosable Matter, the matter should be raised with Core Integrity or an Eligible Recipient.

For matters raised that are assessed as a Workplace Issue, the reporter will be referred to the appropriate channels and the matter will be investigated in line with Crown's Workplace Behaviour Policy. Application of procedural fairness and protection from victimisation remains as detailed in the Crown Reporting a Workplace Complaint or Incident Procedure.

4.6 Public Interest and Emergency Disclosures

Where an Eligible Whistleblower has previously made a disclosure that meets certain conditions to an eligible regulator, disclosures may be made to Members of Parliament or journalists if the requirements set out in section 1317AAD of the Corporations Act for public interest and emergency disclosures are met (as applicable).

An Eligible Whistleblower should contact an independent legal practitioner to ensure they understand the criteria for making a public interest or emergency disclosure that qualifies for protection.

4.7 Making Disclosures

Crown is committed to identifying and addressing wrongdoing as early as possible. Where an Eligible Whistleblower is aware of or suspects a Disclosable Matter, the Eligible Whistleblower is encouraged to disclose that information to Core Integrity in the first instance, or to another Eligible Recipient as soon as reasonably practicable.

Disclosures may be made by Eligible Whistleblowers to Eligible Recipients via webform, email, letter, in person or via telephone.

4.7.1 Anonymity

- Disclosures may be made anonymously and still qualify for protection under Australian Law. However, it may be difficult to obtain adequate information, follow-up, investigate and update the matter and to provide support to an Eligible Whistleblower if identity is not known. For further information about raising an anonymous report through Core Integrity, please see below.
- Eligible Whistleblowers can refuse to answer questions that they feel could reveal their identity during follow-up conversations.
- Eligible Whistleblowers can choose to disclose their identity when making a disclosure but must consent in writing to the sharing of their identity with those assigned to investigate the matter. Crown has obligations under Australian Law to ensure Protected Disclosures are treated confidentially (refer section 4.9.5).
- Individuals who require additional information as to the application of the Australian Law are encouraged to contact the Whistleblower Protection Officer at whistleblower.protection.officer@crownresorts.com.au or seek independent legal advice.

Raising a report Anonymously using Core Integrity

Core Integrity allows Reporters to raise reports as Known, Partially Known and Fully Anonymously. Please refer to the table to understand the options available and any limitations that may apply.

Reporting methods	Explanation	Is two-way communication between the reporter and Crown available?
Known	The Reporter has consented to sharing their contact details, including their name, phone number, and email address. Upon submitting their report, a secure profile is generated, enabling the Reporter to log in and access their report through the Core+ platform.	Yes The reporter can be contacted through the Core Integrity platform, or via phone or email (if provided)
Partially Known	The Reporter has chosen to remain anonymous but has provided their email address when submitting the report.	Yes The reporter can be contacted through

	This creates a secure profile on the Core+ platform, allowing them to access their report and interact with Users through the platform. Neither Core Integrity nor Crown can track or trace the Reporter's email address.	the Core Integrity platform
Fully Anonymous	The Reporter has opted to stay completely anonymous. Upon submitting their report, they received a report ID for future reference if needed. However, they are unable to log in and access their report. Neither Core Integrity nor Crown can have any communication with a fully anonymous reporter.	No The Reporter cannot be contacted

4.8 Protected Disclosures

Eligible Whistleblowers are afforded protections under Australian Law as detailed in section 4.9, if the report is made to an Eligible Recipient and the disclosure is a Disclosable Matter (as defined in section 4.3 of this Policy).

4.9 Treatment of Disclosures

4.9.1 Whistleblower Committee

Crown has established a Whistleblower Committee to receive, assess, investigate, remediate and govern disclosures made under this Policy, and the Committee is supported by resources with requisite skills and experience to manage Crown's Whistleblower obligations

The Whistleblower Committee operates in accordance with the Whistleblower Committee Charter. Committee members are Eligible Recipients and includes senior leader representatives from:

- Crown Resorts Legal team
- Crown Resorts, People and Culture team
- Crown Resorts Group Health, Safety and Well-being team
- Risk or Compliance and Regulatory Affairs team
- Other Crown Team Members as nominated by the Whistleblower Committee Chair in consultation with the Whistleblower Committee on a case-by-case basis may support the Committee.

Conflicts of Interest are considered at each Whistleblower Committee meeting and recorded. If a disclosure involves a member of the Whistleblower Committee, or any of their direct reports, the Whistleblower Committee should agree the most appropriate way to manage that conflict of interest.

The Whistleblower Committee will also review the disclosure and consider whether it is of sufficient seriousness to warrant Board notification as outlined in the Whistleblower Procedures.

Where an Eligible Whistleblower has not authorised the disclosure of their identity or has remained anonymous, then, if reported through Crown's confidential and independent service Core Integrity, the Eligible Whistleblower will be able to receive feedback from Crown regarding their disclosure via Core Integrity using a unique code and confidential password. This does not apply to fully anonymous reporters.

4.9.2 Sensitive Matters

Sensitive Matters will be handled at Whistleblower Committee, however the Chair has discretion for the Sensitive Matter to be handled separately where in his or her reasonable opinion it is appropriate for it to be handled separately to the Whistleblower Committee due to unmanageable conflicts of interest or strict confidentiality requirements.

All Sensitive Matters must have oversight from one independent non-executive director who will be the Chair of the Board Risk, Compliance and PlaySafe Committee for the relevant Crown property and/or Crown Resorts. The relevant independent non-executive director may share the details of a report considered a Sensitive Matter with other independent non-executive directors in the Group, where appropriate to do so unless otherwise advised by the Whistleblower Committee Chair.

Investigations on Sensitive Matters will be conducted expeditiously.

4.9.3 Investigation Procedure

The Whistleblower Committee is the primary vehicle for the management of disclosures made under this Policy. The Whistleblower Committee meets regularly to consider disclosures and facilitate timely investigation and resolution of matters.

Where a disclosure is made under this Policy, a preliminary assessment will be made by the Whistleblower Committee to determine if the matter is a 'Protected Disclosure'.

Once eligibility has been established, the Whistleblower Committee will determine what action should be taken in respect to Protected Disclosure, however, in most cases this will involve undertaking further investigation into the Protected Disclosure.

Any disclosures made that name a subject who has ceased to be a Team Member of the Crown Group will still be investigated where it is possible and appropriate to do so and the disclosure meets the requirements in this Policy, including, in particular, where the report is considered a Sensitive Matter.

The Whistleblower Committee may appoint an investigator either through internal or external channels to undertake an objective, fair and independent investigation, giving equal consideration to:

- Maintaining the confidentiality of the whistleblower;

- The nature and severity of the disclosure;
- The timeframe for the investigation; and
- The expertise required to investigate appropriately.

All investigations of whistleblower disclosures must be conducted in a procedurally fair and confidential manner, to ensure the fair treatment of any individuals named in the Protected Disclosure or to whom the Protected Disclosure relates. Some key elements for consideration when investigating a disclosure are:

- Ensuring any person who may be affected by the investigation can respond to any allegations and evidence against them.
- Where a matter falls outside the knowledge or expertise of the investigator, the investigator will obtain specialist advice.
- That investigations are carried out as expeditiously as reasonably practicable.
- Any reports lodged that name a subject who has ceased to be a Team Member of the Crown Group will still be investigated where possible to do so.
- The investigator will keep detailed records of all interviews conducted and all evidence obtained affecting the outcome of the investigation.

The objective of an investigation is to determine whether there is enough evidence to substantiate or refute matters reported.

At all stages, a discloser will have the ability to request an update on the status of the investigation or to provide additional information for consideration.

If the Whistleblower Committee has a means of communicating with the reporter, an update on the outcome of an investigation will be communicated to the discloser via Core Integrity or the Whistleblower Protection Officer. Given the nature of the matters raised, there may be circumstances where it may not be appropriate to provide details of the outcome of the investigation to the discloser.

Where disclosures are made under this Policy directly to Eligible Recipients, they will be referred to the Whistleblower Committee Chair or Whistleblower Protection Officer as soon as practicable and the same assessment and investigatory procedure will follow.

There may be limitations to the investigation process and Crown may not be able to undertake an investigation if it is not able to contact the discloser for further information or the discloser has refused to provide or has not provided, a means of contacting them or sufficient information in the disclosure for an investigation.

Where a disclosure falls outside of this Policy the matter will be referred to the appropriate area, for example:

- Reports related to a Workplace Issue, the reporter in these matters will be referred to People and Culture and the matter will be investigated in line with Crown's Workplace Behaviour Policy.
- Reports that are received from a guest that relate to a complaint will be transferred to the Guest Experience team and the matter will be managed in

accordance with Crown's Complaints Management Policy.

For further details on how Crown will manage and investigate disclosures, including managing confidentiality and limitations, please refer to the Crown Whistleblower Procedures available on Crown's Policy SharePoint.

4.9.4 Fair Treatment of Team Members Named in a Disclosure

It is important that all investigations of Protected Disclosures made under this Policy are conducted in a procedurally fair and confidential manner, to ensure the fair treatment of any individuals named in the Protected Disclosure or to whom the Protected Disclosure relates. Crown will:

- Take reasonable steps to ensure that those individuals against whom a disclosure is made are provided with support and/or assistance by Crown and have access to Crown's Employee Assistance Program (EAP).
- Take reasonable steps to ensure that any individual(s) who are the subject of a disclosure are informed prior to any adverse findings being made against them. Except in circumstances where early notification has the potential to impact the integrity of the investigation.
- Maintain procedural fairness by ensuring any person who may be affected by the investigation has an opportunity to respond to any allegations and evidence against them.
- Ensure due process by ensuring there is sufficient and sound evidence to substantiate reports of wrongdoing, before any action is taken against a person under this Policy.
- Make determinations on the appropriate disciplinary outcome on a case-by-case basis in response to substantiated findings against the subject of a disclosure. The Whistleblower Committee may make recommendations on remediation actions and activities.

4.10 Protections Available to Eligible Whistleblowers

Crown will support Eligible Whistleblowers who disclose matters under this Policy. Specific protections are available to Eligible Whistleblowers for Protected Disclosures under the Australian Law. These protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures that are made in accordance with the Corporations Act.

4.10.1 Support available to Whistleblowers – the Whistleblower Protection Officer

Crown has appointed a Whistleblower Protection Officer to support, and help protected Eligible Whistleblowers. In most cases, the Whistleblower Protection Officer will act as the point of contact for the Eligible Whistleblower and will be responsible for providing regular feedback to the Eligible Whistleblower directly or where applicable via, Core Integrity. The frequency and timeframe may vary depending on the nature of the disclosure.

The Whistleblower Protection Officer can assist the Eligible Whistleblower by arranging additional supports such as:

- Assist the Eligible Whistleblower to minimise and manage stress, performance impacts or other challenges in the workplace resulting from the disclosure.
- Ensuring appropriate access to support services such as counselling or other professional services available through Crown's EAP.
- Provide avenues for remediation if the Eligible Whistleblower raises concerns with how their report is being handled or investigated
- Performing risk analysis to adequately assess the risk of detriment to an Eligible Whistleblower and where appropriate take preventative steps to minimise the likelihood of these occurring. For instance, assessing whether the identity of an anonymous discloser can be readily identified or will become apparent during the course of an investigation and taking steps to prevent or contain the risk. Detrimental conduct will be investigated and addressed.

The Whistleblower Protection Officer can be emailed directly at whistleblower.protection.officer@crownresorts.com.au. Please note: to ensure consistent support available to Eligible Whistleblowers, this email is also monitored by the Whistleblower Secretariat.

4.10.2 Protection of Identity and Confidentiality

Strict confidentiality obligations apply to Eligible Whistleblowers who make a Protected Disclosure. The identity or any information that may lead to the identification of an Eligible Whistleblower must be kept confidential unless one of the following exceptions applies:

- the Eligible Whistleblower has consented to the disclosure of their identity; or
- the Eligible Whistleblower's identity is not disclosed but disclosure of information that is likely to lead to the identification of the Eligible Whistleblower is reasonably necessary for the purposes of investigating a matter (however, reasonable steps must be taken in order to reduce the risk that the Eligible Whistleblower will be identified); or
- the disclosure is made to:
 - a member of the Australian Federal Police;
 - ASIC or APRA (in relation to disclosures which qualify for protection under the Corporations Act);
 - the Commissioner of Taxation (in relation to disclosures which qualify for protection under the Tax Act);
 - a legal practitioner (other than a legal practitioner employed by Crown) for the purpose of obtaining legal advice or legal representation in relation to the operation of the protections under the Corporations Act; or
 - a body prescribed by the relevant regulations.

If one of the above exceptions does not apply, Crown may take some or all of the following measures, as appropriate in the circumstances, to maintain the confidentiality of an Eligible Whistleblower's identity:

- using a pseudonym in place of their name;
- if they choose to remain anonymous, communicating with them through the Core Integrity platform;
- redacting personal information or references to them;
- referring to them in a gender-neutral context;
- where possible, consulting with them to help identify the aspects of their disclosure that could inadvertently identify them;
- ensuring paper and electronic documents and other materials relating to their disclosure are stored securely;
- limiting access to all information relating to a disclosure, including the discloser's identity, to those directly involved in managing and investigating the disclosure;
- ensuring all individuals involved in handling and investigating a disclosure are aware of the confidentiality requirements, including the consequences of unauthorised disclosure of a whistleblower's identity.
- If an Eligible Whistleblower qualifies for protection under the Australian Law and a person makes an unauthorised disclosure of an Eligible Whistleblower's identity, that person (who made the unauthorised disclosure of identity) may breach the law and the Eligible Whistleblower may be able to seek legal recourse. In some circumstances, this may also be a criminal offence.

4.10.3 Protection against Victimisation

For disclosures which qualify for protection under the Australian Law, it is unlawful for a person to:

- engage in conduct that causes any detriment to an Eligible Whistleblower or another person because the person engaging in the conduct believes or suspects that the Eligible Whistleblower or another person made, may have made, proposes to make, or could make, a Protected Disclosure under the Australian Law; or
- make a threat (whether express or implied, conditional or unconditional, intentional or reckless) to cause any detriment to an Eligible Whistleblower or another person because the Eligible Whistleblower or another person has made, or may make, a Protected Disclosure, whether or not the Eligible Whistleblower actually fears the threat will be carried out.

For the purposes of this Policy and the Australian Law, detriment includes:

- dismissal;
- injury or harm (including psychological);
- alteration of a Team Member's position or duties to their disadvantage (e.g. demotion);

- discrimination;
- harassment or intimidation;
- threats;
- damage to property, reputation or a person's business or financial position; or
- any other unfavourable treatment connected with making a disclosure.

A discloser may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if they believe they have suffered detriment.

Some actions are not detrimental conduct. For example, administrative action that is reasonable to protect an Eligible Whistleblower from detriment and managing an Eligible Whistleblower's unsatisfactory work performance, where this is in line with Crown's performance management framework.

4.10.4 Court Orders

If a person suffers detriment or threatened detriment by another person's conduct that is in contravention of the Australian Law, the person may apply to the court for an order of compensation or another remedy against those involved. Remedies may also include reinstatement, exemplary damages and the making of apologies. Civil and criminal sanctions also apply to breaches of protections under the Australian Law.

The court may also make an order for compensation against a person who was in any way (by act or omission) party to the detrimental conduct, including by aiding, abetting, counselling, procuring, inducing, or conspiring with others to effect, the detriment conduct. This includes if someone were to encourage another person to cause detriment to an Eligible Whistleblower.

Civil and criminal sanctions also apply to breaches of protections under the Australian Law.

4.10.5 Additional Protections for Eligible Whistleblowers

For disclosures which qualify for protection under the Australian Law, Eligible Whistleblowers are afforded the following protections:

- the Eligible Whistleblower will not be subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
- no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against the Eligible Whistleblower on the basis of the disclosure;
- if the disclosure was a disclosure of information to ASIC or APRA (for the purposes of the Corporations Act) or to the Commissioner of Taxation (for the purposes of the Tax Act), the information is not admissible in evidence against the person in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information disclosed; and
- if the Eligible Whistleblower or another person suffers loss, damage or injury

because of a disclosure, or suffers detriment the individual may be entitled to compensation or other remedies.

These protections do not however grant immunity for any misconduct an Eligible Whistleblower has engaged in that is revealed in their disclosure.

Disclosures that qualify for protection under the Australian Law may also amount to the exercise of a workplace right. Crown and its Team Members are prohibited under the *Fair Work Act 2009* (Cth) from taking adverse action against Team Members or contractors because they exercised or propose to exercise any workplace rights.

5. POTENTIAL BREACH CONSEQUENCES

All Team Members of Crown are responsible for understanding and complying with this Policy.

A breach of this Policy may be regarded as misconduct and may lead to disciplinary action up to and including termination of employment or engagement, as applicable.

In particular, Eligible Recipients must be aware of their obligations under the Australian Law to maintain confidentiality of the identity of an Eligible Whistleblower and any information that would lead to the identification of an Eligible Whistleblower, unless one of the exceptions apply as outlined in this Policy. Furthermore, all Team Members of Crown are responsible for ensuring that an Eligible Whistleblower does not suffer detriment as a result of making a disclosure under this Policy.

A breach of the protections under the Australian Law may constitute a civil or criminal offence.

6. CONTINUOUS IMPROVEMENT

The Whistleblower Committee plays an important role in demonstrating Crown's commitment to its Whistleblower Policy. Crown can demonstrate its commitment in practice by ensuring:

- Disclosures are taken seriously and acted on immediately;
- Wrongdoing is addressed promptly;
- Eligible Whistleblowers are provided with adequate protections and support; and
- Early interventions are made to protect Eligible Whistleblowers from detriment.

If the Whistleblower Policy is updated as a result of continuous improvement or a change in the legislation, the Whistleblower training will be reviewed to ensure it remains up to date.

Crown will monitor employee understanding of the Whistleblower Policy as outlined in the Whistleblower Procedures.

7. REPORTING TO THE RISK, COMPLIANCE AND PLAYSAFE COMMITTEE

Each quarter, the Whistleblower Committee must provide to the Crown Resorts Board Risk, Compliance and PlaySafe Committees a report updating them on the whistleblower disclosures that have been received and how they are being managed in line with content requirements outlined in the Whistleblower Procedures.

The Chair of the Whistleblower Committee or the Risk, Compliance and PlaySafe Committee has the discretion to escalate significant or systemic issues identified to the Crown Resorts Limited Board and relevant Property Boards.

While the content of each report will need to be tailored as appropriate, each report should contain the following general information:

- A summary of the new Whistleblower disclosures in the reporting period.
- Status on open Whistleblower disclosure investigations conducted during the period.
- Remediation / closure of cases during the period.
- Trend reporting over time.
- Any material breaches of the Whistleblower Policy.

The Whistleblower Committee is also responsible for ensuring the Board is kept informed about the effectiveness of the Whistleblower Policy, processes and procedures. The Chair of the Whistleblower Committee should report, at least annually to the CRL Board and Property Boards on the state of the Whistleblower Program.

8. ROLES & RESPONSIBILITIES

Title	Responsibilities
Eligible Recipient of information	• Responsible for receipt of whistleblower disclosures and informing disclosers of confidentiality obligations, support and protections available to them. This in turn encourages disclosers to feel comfortable and supported in providing further details when reporting • Seek consent from a disclosure before sharing the identity or information that may reveal the identity of a discloser • Reporting disclosure to the Whistleblower Committee, generally via the Whistleblower Committee Chair or the Whistleblower Protection Officer • Attend periodic training as an Eligible Recipient • May have ongoing role in communicating with whistleblower, particularly if made anonymously.
Whistleblower Committee Chair (Chair)	• The Chair is responsible for convening and facilitating Whistleblower Committee meetings. Further detail can be found in the Whistleblower Committee Charter • Responsible for ensuring relevant Whistleblower reporting is provided to the Board • Owns the Policy and is responsible for ensuring the effectiveness of Crown's Whistleblower Program.
Whistleblower Protection Officer (WPO)	• The WPO is responsible for ensuring the confidentiality of whistleblower disclosures and protecting the identity of the whistleblower where they have elected to remain anonymous. (Refer 7.2.3 for further detail).

Title	Responsibilities
Members of the Whistleblower Committee (incl. other Crown Team Members nominated by the Committee on a case- by- case basis)	• Prepare for, attend and action items from the Whistleblower Committee meetings • Make determinations on whether a report/disclosure is a Protected Disclosure • Conduct whistleblower disclosure enquiries, where appropriate • Provide input and approve the investigation plan • Oversee the conduct of whistleblower investigations • Monitor investigation status and timeliness • Review and challenge investigation reports to ensure protected disclosures have been thoroughly investigated • Determine remediation actions as a result of investigation findings • Take responsibility for overseeing specific investigations to ensure the investigation plan and report is completed in a timely manner. • Maintain confidentiality of whistleblowers and their disclosures.
Appointed Investigation Officer(s)	• Individual(s) appointed by the Whistleblower Committee to lead and • facilitate the investigation into the whistleblower's disclosure • Document the Investigation Plan for Committee endorsement • Conduct a timely investigation according to the investigation plan agreed with the WB Committee while maintaining whistleblower confidentiality • Draft an Investigation report which is to be presented to the Committee who will determine outcome and next steps • Ensure remediation activities and recommendations have been transitioned to the appropriate area, in conjunction with the Whistleblower Secretariat and investigators.
Whistleblower Committee Secretariat	• Responsible for monitoring and managing the Whistleblower portal • Provide guidance to Delegated Reviewers • Oversight of the service delivered by Core Integrity • Logistical support to the Whistleblower Committee, Whistleblower Protection Officer and investigators at all stages of the disclosure management process, including the managing of reports made.

9. POLICY REVIEW AND APPROVAL

This Policy must be reviewed by the Policy Owner on a biennial basis, or as close to frequency as practicable, or as required, to take account of any regulatory or legislative requirements.

Changes required to this Policy will be approved by the Crown Resorts Board. Prior to approval by the Crown Resorts Board this Policy will be submitted to the Risk, Compliance & PlaySafe Committees and the boards of each subsidiary Property for consideration and endorsement.

Minor administrative updates and amendments may be approved by the Policy Owner.

10. FEEDBACK AND QUESTIONS

Crown team members may provide feedback or ask any questions about this document by contacting the Whistleblower Protection Officer. Questions can be asked at any time, including before or after a report have been made under this Policy.

Any complaints regarding this Policy or the handling of reports made under this Policy, including breaches of confidentiality, can also be made to the Whistleblower Protection Officer, Core Integrity, or regulators such as ASIC, APRA or the ATO, as appropriate.

11. RELEVANT LEGISLATION, REGULATIONS AND OTHER GUIDANCE DOCUMENTS

Document Title	Section
ASIC Regulatory Guide 270 Whistleblower Policies	All
Corporations Act 2001 (Cth)	Part 9.4AAA (Sect 1317AA – 1317AK)
ISO 37002 Whistleblowing Management Systems Guidelines	All

12. RELEVANT CROWN POLICIES AND DOCUMENTS

Document Title
• Crown Code of Conduct • Crown Whistleblower Committee Charter • Crown Whistleblower Procedures

This policy and any other material or information related to or connected with this policy is the property of Crown Resorts and must be used for internal purposes only and in the interest of and related to Crown Resorts.

All such information is strictly confidential and may be subject to legal professional privilege.

You must not distribute or disclose this policy any other material or information related to or connected with this Policy unless authorised by Crown Resorts or required by law.

Any unauthorised use is unlawful and may result in disciplinary action and legal action being taken.

Crown reserves the right to amend, cancel or extend policies. All policies on the Crown Website/intranet are current. If you are referring to a hard copy, please ensure it is the most recent version.

Crown Resorts Limited

APPENDIX A: VERSION CONTROL

Document History

Version	Date	Modified by	Comments
0.1	March 2022	Policy Uplift Program	
0.2	December 2022	Glenn Watts – Interim Group General Manager, Compliance & Regulatory Affairs	Minor clarification of sections 4.9.1, 4.15.4 and 4.15.5, approved by Martha Georgiou – Group Executive General Manager, Compliance & Regulatory Affairs
0.3	March 2023	Gin Wilkinson – Manager Enterprise Compliance & Regulatory Affairs	Updates following ASIC feedback to: - section 4.9 outlining key steps in investigation process and Fair Treatment of parties named in a disclosure to section 4.11 to provide specific examples. - Inclusion of specific examples to section 4.15.
2.0	July 2023	Gabby Bobrowski – Head of Enterprise Compliance & Regulatory Affairs	Updates to align the Policy to Whistleblower eLearning module language and to policy layout to make the policy flow more user friendly. Addition of Definitions and alignment between Charter, Procedures and Policy.
2.1	26 August 2024	Group Compliance & Regulatory Affairs	Updates to Policy Owner and next review date to reflect current schedule.
3.0	20 September 2024	Group Compliance & Regulatory Affairs	Major Review completed. Changes made to treatment of Sensitive Matters and minor administrative changes to ensure compliance with regulatory guidance.
3.1	August 2025	Group Compliance & Regulatory Affairs	Changes made to reflect: - changes to anonymous reporting through Core Integrity and impact of those changes on procedures; - composition of the Whistleblower Committee; - transfer of guest complaints to guest experience team.