

# **Special Manager's Final Report December 2023**

**Appendices A–G**

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## Appendix A: Acquittal of Special Manager requirements

The Special Manager's functions derive from a combination of Part 3, Division 4 of the Casino Control Act and an Instrument of Appointment dated 21 December 2021. These reflect the requirements for the Special Manager proposed by Appendix I of the Finkelstein Report, which sets out a range of matters the Special Manager is required to acquit in the exercise of his functions.

The principal functions of the Special Manager, which are supervisory, investigative and evaluative in nature, are supplemented by administrative ones that require regular reporting to government, as well as budget forecasting and periodical expense notifications to the VGCCC for reimbursement by Crown.

The Special Manager's legislative functions are set out in the Casino Control Act and may be categorised as follows:

- general oversight – to oversee the affairs of the Melbourne casino operator, including its casino operations<sup>1</sup>
- investigative – to carry out any investigations specified in the Instrument of Appointment<sup>2</sup>
- reporting – to provide six-monthly interim reports and this final report to the VGCCC and the Minister for Consumer Affairs, Gaming and Liquor Regulation on the performance of the Special Manager's functions<sup>3</sup>
- to provide this final report to government, which must include consideration of:
  - whether there is evidence of maladministration, illegal or improper conduct, or any conduct that may give rise to a material contravention of any law<sup>4</sup>
  - the conduct of casino operations during the Special Manager's term<sup>5</sup>
  - Crown's progress in implementing recommendations made by the Finkelstein Royal Commission<sup>6</sup>
  - any other matters specified in the Instrument of Appointment and any other relevant matters.<sup>7</sup>

The Instrument of Appointment requires the Special Manager to:

- supervise Crown's reform program designed to return it to suitability<sup>8</sup>
- investigate any matter deemed necessary<sup>9</sup>
- investigate, review and evaluate as relevant the matters in Appendix I<sup>10</sup>
- report as required:
  - to the Minister and VGCCC as noted above<sup>11</sup>
  - publicly on OSM activities<sup>12</sup>
  - to the VGCCC on OSM budget forecasts and expenses.<sup>13</sup>

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<sup>1</sup> *Casino Control Act 1991 (Vic)*, s 36C(1)(a).

<sup>2</sup> *Casino Control Act 1991 (Vic)*, s 36C(1)(b).

<sup>3</sup> *Casino Control Act 1991 (Vic)*, ss 36C(1)(c), 36G(1), (2).

<sup>4</sup> *Casino Control Act 1991 (Vic)*, s 36G(3)(a), (b), (c).

<sup>5</sup> *Casino Control Act 1991 (Vic)*, s 36G(3)(d).

<sup>6</sup> *Casino Control Act 1991 (Vic)*, s 36G(3)(e).

<sup>7</sup> *Casino Control Act 1991 (Vic)*, s 36G(3)(f), (g).

<sup>8</sup> Instrument of Appointment, Appointment of the Special Manager, 21 December 2021, paragraph 1.3.

<sup>9</sup> Instrument of Appointment, Appointment of the Special Manager, 21 December 2021, paragraph 2.1.1.

<sup>10</sup> Instrument of Appointment, Appointment of the Special Manager, 21 December 2021, paragraph 2.1.2.

<sup>11</sup> Instrument of Appointment, Appointment of the Special Manager, 21 December 2021, paragraphs 2.2.3, 2.2.4.

<sup>12</sup> Instrument of Appointment, Appointment of the Special Manager, 21 December 2021, paragraph 2.3.

<sup>13</sup> Instrument of Appointment, Appointment of the Special Manager, 21 December 2021, paragraph 2.4.

While monitoring all relevant Crown strategies, and Board and key executive decisions and activities (including at Crown Resorts' level insofar as they related to the Melbourne casino), the Special Manager's supervisory and general oversight functions have focused on Crown's Melbourne casino operations in accordance with the scope of the Finkelstein Royal Commission's recommendations and the statutory basis of his role. The oversight of Crown has also involved monitoring:

- internally and externally reported compliance breaches
- internal and external complaints and notifications
- internal Crown investigations that involve the Melbourne casino.

These sources, together with all other information obtained by the OSM over the course of the Special Manager's term, have not revealed any evidence of maladministration, illegal or improper conduct indicative of the type of serious and systemic failures previously uncovered by the Finkelstein Royal Commission.

The evidence before the OSM indicates that serious or material breaches of laws, regulations or other obligations have been drawn to the attention of the VGCCC and other relevant regulators, and they have not required separate or further investigation by the OSM beyond what is reflected in the Special Manager's interim and final reports.

Three detailed interim reports covering the prescribed six-monthly periods have been provided in confidence to the Minister and VGCCC by the due date.

The required six-monthly OSM activity reports, budget forecasts and expense reports have all been published or submitted as required.

The following table sets out the Appendix I items 3 to 18 requirements to which the Special Manager must have regard in undertaking his assessment. It includes a summary of the OSM's assessment against each of the requirements, and cross-references to relevant sections of either previous interim reports or this final report that contain the OSM's analysis of these requirements.

Appendix I reference	Section	Requirement (as stated in Appendix I)	OSM conclusion	Report reference(s)
3	Risk management	The Special Manager is to evaluate whether:		
3a	Risk management	Crown Melbourne has conducted a suitable 'root cause' analysis into the failures outlined in the [Bergin] Report and in the [Finkelstein] Report	<p><b>Crown has conducted a suitable root cause analysis into the failures outlined in the Bergin Report and the Finkelstein Report, and has made good progress in implementing the recommendations arising from that analysis.</b></p> <p>Crown engaged Ernst &amp; Young to conduct a root cause analysis. Ernst &amp; Young's root cause report was completed on 14 November 2022 and included 14 recommendations. Crown has actioned all 14 recommendations, and has undertaken activities to embed the lessons from the root cause analysis.</p>	<p>December 2022 interim report, section 3.4.4</p> <p>June 2023 interim report, section 3.3.2</p> <p>Final report, section 7.2</p>
3b	Risk management	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	<p><b>Crown Melbourne has implemented, completely and effectively, the recommendations made by Mr Peter Deans in his Expert Report dated 29 June 2021 on the Risk Management Frameworks and Systems of Crown Resorts Limited.</b></p> <p>Crown has implemented Mr Peter Deans' recommendations, which required changes to risk management governance, frameworks, function and reporting.</p> <p>Mr Deans' report to the Perth Royal Commission in October 2021 confirmed Crown's implementation of the majority of his recommendations at that time.</p> <p>Since the implementation of these recommendations, Crown's risk management frameworks and systems have continued to be refined with the assistance of Mr Deans, as engaged by Crown. This has included further revising the Risk Management Framework and the Risk and Controls Framework, establishing a property-specific RAS for Crown Melbourne, and further refining risk appetite measures and tolerance levels for reporting to the Board.</p>	<p>December 2022 interim report, sections 8.2.2 and 8.4.2</p> <p>Final report, section 7.1</p>
3c	Risk management	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	<p><b>Crown has undertaken 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. Crown is aiming to implement the review recommendations in full by September 2024.</b></p> <p>The review, conducted by specialist advisory firm Blackhall &amp; Pearl between April and June 2023, concluded that Crown had made</p>	<p>June 2023 interim report, section 7.3.7</p> <p>Final report, section 7.4.2</p>

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		a result of that review have been implemented completely and effectively.	<p>progress in the transformation of its risk functions, systems, culture and mindset.</p> <p>Blackhall &amp; Pearl made 11 recommendations. The Crown Melbourne Risk, Compliance and Responsible Gaming Committee approved the action plan to address all but one of Blackhall &amp; Pearl's recommendations. This recommendation related to the creation of a Chief Risk Officer. Crown is of the view that the Group Compliance and Legal Officer effectively performs the functions of a Chief Risk Officer.</p> <p>Three recommendations have been addressed, and the remaining recommendations are expected to be addressed by 30 September 2024. Crown has made good progress in implementing the recommendations, and considers that September 2024 is a reasonable timeframe within which to address the remainder.</p>	
4	Culture			
4	Culture	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.	<p><b>Crown has completed Phase 4 of its culture review, referred to as Project Darwin. It has made good progress in implementing key aspects of its CRP, but it is too early to assess if this program will be effective in driving organisational culture change.</b></p> <p>Project Darwin involved defining an aspirational culture and developing a roadmap for its achievement, comprising nine action areas. Crown has simplified the initial roadmap prepared by Deloitte, and reflected seven of the nine actions in its CRP. The remaining two actions have been incorporated in the Melbourne Transformation Plan.</p> <p>Crown has made good progress with the design and implementation of four central CRP initiatives:</p> <ul style="list-style-type: none"> <li>• a performance management system</li> <li>• a variable pay program</li> <li>• a leadership development program</li> <li>• the 'Your Voice' survey.</li> </ul> <p>It is too early to assess whether Crown's CRP will effectively drive culture change, as many initiatives are only in their first year of operation. Initial employee feedback on specific initiatives such as the Thrive Leadership Development Program and the performance management system is positive.</p>	<p>December 2022 interim report, section 4.1.2</p> <p>June 2023 interim report, section 3.2.5</p> <p>Final report, section 4.2</p>

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5	<b>AML/CTF: External report recommendations</b>	The Special Manager is to evaluate whether there has been effective implementation of the recommendations set out in the following reports:		
5a	AML/CTF: External report recommendations	<b>Promontory Phase 1 Report</b> dated 24 May 2021 and titled 'Phase 1: AML Vulnerability Assessment'. The recommendations are set out in section 4.	<b>Crown has effectively implemented the recommendations from the Promontory Phase 1 report, which were aimed at addressing gaps and weaknesses in Crown's Joint AML/CTF Program.</b> The recommendations related to gaps or weaknesses in Crown's Joint AML/CTF Program, particularly with regard to how Crown identifies, mitigates and manages the risks associated with customers, employees and financial services, and its overall control framework.	Final report, section 6.2
5b	AML/CTF: External report recommendations	<b>Promontory Phase 2 Draft Report</b> dated 20 June 2021 and titled 'Strategic Capability Assessment'. 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.	<b>Crown has fully implemented the FCCCP and, in doing so, effectively addressed the observations made in the Promontory Phase 2 report.</b> The Promontory Phase 2 report did not contain specific recommendations; rather, it made general observations about what good practice might look like in Crown's context. Crown has addressed these observations through the delivery of the FCCCP and associated AML/CTF controls. As part of the implementation of the FCCCP, Crown has achieved the articulated 'target state' in relation to workforce numbers, structures, roles and functions. In addition, Crown's current financial crime structure, capability and current workforce numbers are adequate to manage its financial crime risks.	December 2022 interim report, Appendix A, item 4.2.4  Final report, sections 6.2 and 6.3
5c	AML/CTF: External report recommendations	<b>Deloitte Phase 1 report</b> dated 26 March 2021 and titled 'Assessment of Patron Account Controls'.	<b>Crown has effectively implemented all recommendations from the Deloitte Phase 1 report.</b> The implementation of these recommendations has enhanced Crown's patron account controls and its transaction monitoring program, insofar as that program applies to patron accounts.	December 2022 interim report, section 7.2.3

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5d	AML/CTF: External report recommendations	<b>Deloitte Phase 2 report</b> 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.	<b>Crown has effectively implemented the recommendations from the Deloitte Phase 2 report.</b> In implementing some of these recommendations, Crown initiated Project DeLorean to look at specific patrons and transactions that might indicate ML/TF behaviours. Crown's Risk Assurance team undertook a review in November 2022 and identified a number of issues requiring further action, which have been satisfactorily addressed.	December 2022 interim report, section 7.2.3  Final report, section 6.2
5e	AML/CTF: External report recommendations	<b>Deloitte Phase 3 report</b> concerning a Further Controls Assessment. The details of the Further Controls Assessment are set out in Deloitte's engagement letter dated 22 February 2021.	<b>Crown has effectively implemented the recommendations from the Deloitte Phase 3 report.</b> Crown's implementation of these recommendations has enhanced the design and operational effectiveness of its patron account controls, and insofar that they relate to these controls, its resourcing, governance, and transaction monitoring program.	Final report, section 6.2
5f	AML/CTF: External report recommendations	<b>Deloitte Report on Hotel card transactions review.</b> The details of the Hotel card transactions 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)'.	<b>Crown has effectively implemented the recommendations from Deloitte's Hotel card transactions review.</b> These recommendations were addressed as part of Project DeLorean. All of them have been implemented.	Final report, section 6.2
5g	AML/CTF: External report recommendations	<b>Initialism Transaction Monitoring Review</b> dated June 2021. The recommendations are on pages 6, 14, 28–9, 37–8 and 44.	<b>Crown has effectively implemented the recommendations from the Initialism Transaction Monitoring Review.</b> The implementation of these recommendations has contributed to the improvement of Crown's transaction monitoring program, in particular its alert disposition (automated and manual) and investigation report guidelines and procedures.	Final report, section 6.2



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6–8	AML/CTF: McGrathNicol report			
6	AML/CTF: McGrathNicol report	McGrathNicol's Forensic Review dated July 2021 identified preliminary indications of 'structuring' and 'parking' (being money laundering techniques) on Crown Melbourne's [Deposit Account Balance] accounts.	<p><b>Crown has investigated the suspected 'structuring' and 'parking' transactions identified by McGrathNicol. As a result, Crown intends to present a minor change to its Joint AML/CTF Program to the Board for approval in 2024.</b></p> <p>In response to the findings from the McGrathNicol report, Crown conducted an investigation into the transactions identified as exhibiting potential indicators of 'structuring' and 'parking'. This exercise was called Project Peyo.</p>	<p>December 2022 interim report, section 7.2.2</p> <p>June 2023 interim report, section 6.4</p>
7	AML/CTF: McGrathNicol report	McGrathNicol recommended further investigation of those transactions and the suspected structuring and parking.	<p>As part of Project Peyo, Crown's investigation of the transactions identified as potential 'structuring' found the majority of the transactions were legitimate and in line with typical gaming activity. As a result, Crown determined it was not necessary to make any changes to its Joint AML/CTF Program. The OSM is satisfied that Crown's conclusions are reasonable.</p>	<p>Final report, section 6.2</p>
8	AML/CTF: McGrathNicol report	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.	<p>Crown has undertaken the necessary additional work to investigate the transactions potentially exhibiting indicators of 'parking'. As a result of its findings, Crown proposes to make a minor change to the program (to reference the Dormant Account Policy). This change will be made in the next update to the Joint AML/CTF Program, which is expected to be put to the Board for approval in March 2024.</p>	
9–10	Crown's FCCCP			
9	AML/CTF: Crown's FCCCP	Crown's Financial Crime and Compliance Change Program (FCCCP) is set out in a document prepared by Mr Steven Blackburn, Crown's then Group Chief Compliance and Financial Crime Officer, dated 24 May 2021. 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,	<p><b>Crown has completed all of the FCCCP deliverables.</b></p> <p>The FCCCP is Crown's key transformation program for financial crime, and has improved Crown's ability to identify, manage and monitor compliance with its financial crime legislative obligations. The implementation of the FCCCP has also enhanced Crown's risk assessment methodologies and solutions, ongoing customer due diligence processes and AML/CTF training program, among other things.</p>	<p>Final report, section 6.3</p>

Appendix I reference	Section	Requirement (as stated in Appendix I)	OSM conclusion	Report reference(s)
		roles and responsibilities, customers and controls, and data and systems.		
10	AML/CTF: Crown's FCCCP	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.	<b>Crown has effectively implemented all of the recommended reforms set out in the FCCCP (see item 9).</b> Crown has effectively implemented the FCCCP reforms. Overall, the implemented deliverables achieve the purpose of improving the maturity of Crown's overall financial crime and compliance risk and control environment.	Final report, section 6.3
11	<b>AML/CTF: Other external expert work</b>	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:		
11a	AML/CTF: Other external expert work	PwC [PricewaterhouseCoopers] Australia's work for Crown concerning an uplift in Crown's SMR reporting, TTR reporting and/or IFTI [International Funds Transfer Instructions] reporting;	<b>Crown has effectively addressed PwC's work relating to uplifts in SMR, TTR and/or IFTI reporting.</b> Crown has addressed the work undertaken by PwC relating to its regulatory reporting requirements as part of the FCCCP Financial Crime Obligations Initiative. Crown has effectively implemented all of the recommendations from PwC's work concerning SMR, TTR and IFTI reporting.	Final report, section 6.3
11b	AML/CTF: Other external expert work	Allens Linklaters' work for Crown concerning an uplift in Crown's SMR reporting, TTR reporting and/or IFTI reporting; and	<b>Crown did not proceed with Allens Linklaters' work, and therefore did not implement any recommendations that may have resulted from this work.</b> Crown advised that it did not proceed with the Allens Linklaters work, as this further work relating to Crown's regulatory reporting requirements had already been undertaken by PwC and Crown's Risk Assurance team. The OSM is satisfied that Crown is meeting its regulatory reporting requirements, and that any necessary improvements have been actioned through the FCCCP or as a result of work undertaken by PwC.	Final report, section 6.3

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11c	AML/CTF: Other external expert work	an enterprise-wide risk assessment.	<b>Crown has effectively implemented the recommendations from the 2021 EWRA.</b> As a result of Crown undertaking its 2021 EWRA, a number of improvements were identified to enhance its overall ML/TF risk environment. These included improvements to its ML/TF controls, CRA, ML/TF risk awareness training, and ML/TF issues and event tracking.	Final report, section 6.3
12–13	<b>AML/CTF: Resourcing</b>			
12	AML/CTF: Resourcing	The Special Manager is to assess the adequacy of Crown Melbourne's financial crime budget.	<b>Crown Melbourne's financial crime budget is adequate to manage its financial crime risk and obligations.</b> Crown has been able to appropriately manage its remediation and BAU activities with its current budget. Crown's current budget is sufficient to adequately address its financial crime and compliance obligations, and manage its financial crime risk.	June 2023 interim report, section 6.5  Final report, section 6.4
13	AML/CTF: Resourcing	The Special Manager is to assess the adequacy of the staff numbers in the financial crime group.	<b>Crown has adequate staff numbers in its financial crime group to manage its day-to-day operations and remediation work.</b> The structure, capability and staff numbers in Crown's Financial Crime team are adequate to address its financial crime and compliance obligations, and manage its financial crime risk.	June 2023 interim report, section 6.5  Final report, section 6.4
14–16	<b>AML/CTF: AML/CTF Program</b>			
14	AML/CTF: AML/CTF Program	The Special Manager is to evaluate whether the Crown Melbourne Board is providing effective and meaningful oversight of its AML/CTF Program.	<b>The Crown Melbourne Board provides effective and meaningful oversight of Crown's Joint AML/CTF Program.</b> The Board and relevant senior managers are adequately overseeing compliance of the Joint AML/CTF Program, and management is appropriately escalating and reporting detected breaches to the Board.	June 2023 interim report, section 6.3.3  Final report, section 6.4
15	AML/CTF: AML/CTF Program	The Special Manager is to assess whether Crown Melbourne is complying with its AML/CTF Program.	<b>Crown is largely complying with its Joint AML/CTF Program.</b> Crown is working on addressing various recommendations from the internal and external audits/reviews conducted in relation to key focus areas, such as automated CRA, employee due diligence and training. The testing of key components of the Joint AML/CTF Program, including in relation to the key focus areas set out above, provides	June 2023 interim report, section 6.3.2  Final report, section 6.4

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			<p>evidence that Crown is largely complying with its Joint AML/CTF program.</p> <p>While Crown has identified potential issues in or breaches of its Joint AML/CTF Program, it has the mechanisms to detect these early, and the appropriate channels and governance to escalate, report and remediate any breaches.</p>	
16	AML/CTF: AML/CTF Program	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.	<p><b>Crown conducted a number of internal and external audits in relation to its Joint AML/CTF Program compliance and legislative obligations. These reviews did not identify any instances of non-compliance.</b></p> <p>As noted in the June 2023 interim report, Exiger undertook an independent review of Crown's Joint AML/CTF Program in 2022 and 2023. While there were a number of recommendations made by Exiger as a result of the review, it concluded that Crown's program was legislatively compliant. In addition to the review undertaken by Exiger, Crown has undertaken a number of internal reviews or audits in relation to its Joint AML/CTF Program.</p> <p>The reviews made recommendations for improvements. Crown is appropriately actioning the findings from these reviews, and continues to track progress in this regard through Archer. Where non-compliance issues are identified, Crown detects these early, and has the appropriate channels and governance to escalate, report and remedy breaches.</p>	<p>June 2023 interim report, sections 6.3.1 and 6.6</p> <p>Final report, section 6.6</p>
17	<b>Responsible service of gambling</b>	The Special Manager is to assess Crown Melbourne's responsible service of gambling program. This assessment should include examining:		
17a	Responsible service of gambling	the effectiveness of Crown Melbourne's staff training in the responsible service of gambling;	<p><b>The foundations are in place to indicate the reformed RSG training program at Crown Melbourne is likely to be effective. It is too early to assess whether the program is effective, as evaluations of training and skills testing of employees have not yet occurred in a systematic manner.</b></p> <p>Employees appear to have a far greater understanding of their RSG roles and responsibilities than at the time of the Finkelstein Royal Commission. Training is reinforced by timely and engaging employee communications. The program includes mechanisms to assess training</p>	Final report, section 5.5

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			effectiveness, including observation of employee capability, in-session reviews and post-training assessments.	
17b	Responsible service of gambling	the adequacy of the responsible service of gambling staff numbers;	<p><b>Crown Melbourne's RSG employee numbers are generally adequate to manage its RSG obligations, except during busy periods.</b></p> <p>Since the Finkelstein Royal Commission, Crown Melbourne has significantly increased RSG operational resources. However, at this stage, there are not enough PSAs rostered on the main gaming floor to monitor for observable signs and respond to all play period alerts in a timely manner during busy periods. Crown is currently onboarding additional PSAs and has developed a forecasting tool to better manage its FTE requirements.</p>	Final report, section 5.4.1
17c	Responsible service of gambling	the adequacy of funding of Crown Melbourne's responsible service of gambling program;	<p><b>The funding of Crown Melbourne's RSG program is currently adequate to deliver its strategic and operational requirements.</b></p> <p>Crown Melbourne's RSG budget has increased significantly since the time of the Finkelstein Royal Commission, mostly driven by the increased operational expenses related to hiring further PSAs. For the 2023 financial year, Crown Melbourne spent \$7.7 million on operational and strategic expenses, compared with \$1.91 million in the 2021 financial year.</p>	Final report, section 5.4.2
17d	Responsible service of gambling	the effectiveness of the services provided by the responsible service of gambling staff;	<p><b>It is too early to assess whether the services provided by the RSG staff at Crown Melbourne are effective in ensuring Crown Melbourne does not exploit its customers and takes active measures to minimise the harm caused by gambling. However, the Crown PlaySafe Strategy places an emphasis on data collection as a key enabler of better RSG performance and improved evaluation of its services, which, over time, is expected to provide confidence that its services are effective.</b></p> <p>Crown Melbourne has redeveloped the Responsible Gaming Centre into the new Crown PlaySafe Centre, with the goal of providing a more comfortable private space for customers to speak with PSAs.</p> <p>The MRAP included various deliverables related to improving the effectiveness of Crown Melbourne's RSG services, including:</p> <ul style="list-style-type: none"> <li>implementing the Salesforce platform to better monitor and respond to play period alerts</li> </ul>	<p>December 2022 interim report, section 6.4.3</p> <p>June 2023 interim report, section 5.5.2</p> <p>Final report, section 5.8</p>

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			<ul style="list-style-type: none"> <li>appointing a translation provider to better communicate with customers where English is their second language</li> <li>improving its referral process to Gambler's Help services</li> <li>refreshing the Crown Melbourne website and RSG communications on the casino floor</li> <li>developing and enhancing a dashboard to monitor RSG operations.</li> </ul> <p>Crown completed a study aimed at collecting data about customer understanding and perceptions of RSG, and about their access to harm minimisation tools such as self-exclusion. It has developed a draft action plan based on the findings of the study, aimed at improving its RSG services to better support its customers and minimise harm. It plans to conduct the survey regularly to monitor performance and identify areas for improvement.</p>	
17e	Responsible service of gambling	the effectiveness of Crown Melbourne's Self-Exclusion Program and related programs (for example Time Out);	<p><b>Crown Melbourne now has the key elements of an effective Exclusion Program.</b></p> <p>Crown has reformed its Exclusion Program in response to the specific failings identified by the Finkelstein Report. Observations and evidence suggest that customer awareness of the program is growing, employees take seriously requests from customers to ban themselves from gambling, and the PlaySafe team is monitoring customers who return to gambling after their self-exclusion has been revoked. Importantly, the OSM considers Crown Melbourne is monitoring and enforcing exclusion orders adequately, given current FRT capabilities, and issuing customers who have repeated self-exclusion breaches with an RG WOL. Crown Melbourne's ability to enforce its Exclusion Program will continue to improve as mandatory carded play is implemented across the casino.</p>	Final report, section 5.6
17f	Responsible service of gambling	the effectiveness of the responsible service of gambling 'enhancements' approved in May 2021; and	<p><b>The RSG 'enhancements' approved in May 2021 have been largely implemented to improve the effectiveness of preventing and minimising gambling harm.</b></p> <p>Crown Melbourne has implemented the following May 2021 enhancements:</p> <ul style="list-style-type: none"> <li>employed a Manager – Responsible Gaming, a Responsible Gaming Administration Officer, four new RGAs (now PSAs) and a part-time Responsible Gaming Psychologist (Research)</li> </ul>	<p>December 2022 interim report, section 6.4.5</p> <p>June 2023 interim report, sections 5.3.1, 5.6.2 and 5.8</p>

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			<ul style="list-style-type: none"> <li>• increased the total package remuneration of RG team members by either 20 per cent or 25 per cent</li> <li>• implemented a new Play Periods Policy</li> <li>• ceased the Bingo and Red Carpet programs</li> <li>• recruited additional RGAs (now PSAs) with culturally and linguistically diverse backgrounds or skills</li> <li>• progressed cashless gaming as part of the implementation of reforms requiring a \$1,000 daily cash use limit, and daily winnings of more than \$1,000 to be paid by cheque/electronic funds transfer</li> <li>• rolled out updated gaming marketing and promotions to ensure that 'direct to member' offers do not require customers to exceed historical behaviours (spend or visit frequency) to receive the benefit</li> <li>• ceased issuing promotional gambling vouchers to new Crown Rewards members when they sign up to the loyalty program</li> <li>• commissioned research to determine whether aspects of the Crown Rewards Loyalty Program may be causing harm and identify measures to control that risk</li> <li>• ceased sales incentives for gaming sales employees and excluded turnover-based incentives from its performance management system and incentives framework.</li> </ul> <p>Crown has also implemented improvements that go beyond its initial May 2021 enhancements, to ensure its marketing and loyalty programs incorporate a harm minimisation lens, and do not directly target vulnerable or financially constrained people. Its planned reform of the Loyalty Program sets a positive foundation for the ongoing transformation of Crown Rewards.</p> <p>Crown is investigating how it can contribute to a state-wide exclusion register, which is an outstanding May 2021 enhancement. The OSM has noted Crown cannot progress this initiative without support from other industry participants. Crown currently shares exclusion information with The Star Casino.</p>	Final report, section 5.7

Appendix I reference	Section	Requirement (as stated in Appendix I)	OSM conclusion	Report reference(s)
17g	Responsible service of gambling	whether Crown Melbourne complies with its Gambling Code and Play Periods Policy.	<p><b>Crown Melbourne has revised its Gambling Code and Play Periods Policy in response to the specific failings identified by the Finkelstein Report and a new Ministerial Direction. It has also established systems, policies and processes to comply with its new Gambling Code.</b></p> <p>Employees are reporting observable signs to the PlaySafe team, and Crown PSAs are engaging regularly with customers to encourage safer gambling behaviours and monitor their play periods.</p> <p>Crown Melbourne could do more to monitor its customers for observable signs – at present, it is relying heavily on monitoring play periods to support its interventions with customers. Although the OSM has seen evidence that Crown Melbourne is effectively enforcing casino play periods for carded players, customers can still gamble on table games uncarded with little monitoring of their play periods.</p>	Final report, section 5.3
18	<b>Compliance with statutory and contractual obligations</b>			
18	Compliance with statutory and contractual obligations	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.	<p><b>Crown has established systems, policies and processes that are able to identify compliance breaches and report them as appropriate to the relevant regulators and authorities. As far as the OSM is aware, incidents and breaches identified by Crown have been appropriately reported to the relevant regulators and authorities.</b></p> <p>The information obtained by the OSM over the course of the Special Manager’s monitorship has not revealed any evidence of serious and systemic non-compliance with Crown’s obligations under the Casino Control Act, the Gambling Regulation Act, the Casino Agreement or the Management Agreement.</p>	<p>December 2022 interim report, sections 9.3, 9.4, 9.5, 9.6 and 9.7</p> <p>June 2023 interim report, sections 7.4.3, 8.5 and 8.6</p> <p>Final report, sections 7.5.4, 9.8 and 9.9</p>



## Appendix B: OSM stakeholder engagement from 1 July to 31 December 2023

This appendix outlines the OSM's engagement with Crown and other external stakeholders, as well as the public enquiries received, during this reporting period.

### Engagement with Crown

The OSM has continued to maintain constructive working relationships across Crown, including with Crown's Board and senior leadership. The Special Manager's and the Deputy Special Managers' direct engagement with Crown's Board and senior leadership has included the following:

- The Special Manager has met regularly with Crown Melbourne Chair, Mr Ian Silk, Crown Melbourne CEO, Mr Mike Volkert and Crown Resorts CEO, Mr Ciarán Carruthers. These meetings have been used to discuss issues relevant to Crown's operations and the progress of its reform agenda, and other issues and concerns.
- The Special Manager and Deputy Special Managers have attended each of the six Crown Melbourne Board meetings held in this reporting period, as well as 11 additional ad hoc meetings on particular issues and reform initiatives.
- In November 2023, the Special Manager and Deputy Special Managers held individual focused discussions with Crown Melbourne independent directors, Ms Helen Silver AO, Ms Mary Waldron and Ms Henriette Rothschild, as referenced in section 2.4 and discussed in section 9.3.
- The Special Manager and Deputy Special Managers have met with newly appointed Crown senior executives, including Ms Brandee Wade, CFO, and Mr Drew Kempen, General Manager – Internal Audit. These introductory meetings have been used to better understand these senior executives' roles and hear their insights into Crown's reform program.
- In November 2023, the Special Manager and Deputy Special Managers met with Blackstone Inc. executives to discuss the progress of, and Blackstone's ongoing commitment to, Crown's transformation.

Further details on the Special Manager's and/or OSM representatives' attendance at Crown Board and management committee meetings are provided in Appendix C.

In addition to the meetings with Crown set out above:

- Regular meetings have continued between the OSM and Crown at officer level to facilitate the OSM's information-gathering and assessment activities. The dedicated OSM office space provided by Crown within its Melbourne complex has helped to facilitate ongoing engagement and information sharing between Crown and OSM staff.
- The Special Manager and OSM staff have attended a range of Crown internal forums – including leadership briefings, launches (for example, of the PlaySafe Centre), employee town hall briefings and employee musters – to observe the nature of communications with, and queries from, employees.
- In July 2023, the Special Manager sent Crown employees a message via the Crown CEO advising them of the publication of the June 2023 activity report. The message invited employees who wished to raise any matters about Crown's conduct to contact the OSM confidentially via an enquiry inbox accessible on the OSM website.
- In August 2023, the Special Manager met with Mr Michael Branson, CEO of Crown London Aspinalls, and Mr Tony Boyd, CEO of Crown UK.
- In November 2023, the OSM met with the Director of Casinos, Clubs and Gaming at the United Workers Union to discuss issues facing Crown and its employees.

## Broader stakeholder engagement

During the Special Manager’s term, the OSM has maintained engagement with a range of government and community stakeholders who participated in, or otherwise have significant interest in, the findings and recommendations of the Finkelstein Royal Commission. These stakeholders have provided important insights to support the OSM’s work program.

In particular, the Special Manager has liaised regularly with the VGCCC Chair, Ms Fran Thorn. The OSM has provided high-level briefings to the VGCCC Commissioners, CEO and senior executives in relation to the Special Manager’s June 2023 interim report and the OSM’s work plan for the final reporting period. Close liaison has continued between the OSM and VGCCC at officer level to facilitate information sharing, including in relation to relevant public complaints received via the OSM’s enquiry inbox (discussed below).

Further detail of the OSM’s broader stakeholder engagement in this final reporting period is set out in the following table, which includes the organisations with which the OSM has engaged and the OSM’s key contacts in those organisations.

## Public enquiries

As previously reported, the OSM established a public enquiry inbox, accessible via its website, in June 2022. Three enquiries were received and responded to during this reporting period, as follows:

- A legal representative of a customer raised serious concerns about potential breaches by Crown Melbourne of its Gambling Code and Play Periods Policy, and AML/CTF requirements. The OSM consulted with the VGCCC and Crown about the enquiry, and the VGCCC confirmed it would investigate. This matter is referred to in section 5.3.2.
- A customer raised concerns regarding their involvement in an incident at Crown Melbourne, and their subsequent engagement with Victorian Government agencies, including the VGCCC and Liquor Control Victoria. The OSM consulted with the VGCCC and Liquor Control Victoria regarding this matter. Based on the advice provided, the OSM informed the person that they could request Liquor Control Victoria to conduct an internal review of their complaint.
- [REDACTED]

The OSM has appreciated support received from the VGCCC and Liquor Control Victoria in handling enquiries received via its public enquiries inbox.

## OSM external stakeholder engagement

Organisation	Key contacts
<b>Community and non-government organisations</b>	
<b>Alliance for Gambling Reform (AGR)</b>	Tim Costello AO, Chief Advocate Carol Bennett, CEO
<b>United Workers Union (UWU)</b>	Dario Mujkic, Director, Casinos, Clubs and Gaming
<b>VicWISE</b>	Manorani Guy, Founder and President
<b>Federal law enforcement agencies and regulators</b>	
<b>Australian Criminal Intelligence Commission (ACIC)</b>	Matt Rippon, Acting CEO Sharyn Matthews, Director, Intelligence
<b>Australian Federal Police (AFP)</b>	Grant Nicholls, Acting Deputy Commissioner, Crime Hilda Sirec, Assistant Commissioner, Southern Command Anthony Hall, Detective Superintendent Rick Briggs, Detective Inspector Glenn Tankard, Detective Sergeant
<b>Australian Securities and Investments Commission (ASIC)</b>	Joseph Longo, Chair Brendan Caridi, Senior Executive Leader, Investigation and Enforcement Action
<b>Australian Taxation Office (ATO)</b>	Jeremy Hirschhorn, Second Commissioner, Client Engagement Rebecca Saint, Deputy Commissioner, Public Groups (Strategy and Programs) John Ford, Acting Deputy Commissioner, Fraud and Criminal Behaviours Jade Hawkins, Assistant Commissioner, Criminal Law Program, Fraud and Criminal Behaviours Ash Khera, Assistant Commissioner, Financial Crime, Integrated Compliance
<b>Australian Transaction Reports and Analysis Centre (AUSTRAC)</b>	Peter Soros, Acting CEO Bradley Brown, Acting Deputy CEO, Regulation and Reform David Hawkins, Acting National Manager, Regulatory Operations Vicky Orshansky, Director, Regulatory Operations

<b>Organisation</b>	<b>Key contacts</b>
<b>Industry and business</b>	
<b>Australia and New Zealand Banking Group (ANZ)</b>	Guy Boyd, Chief Compliance Officer Cassandra Hewett, Group Head, Financial Crime and Group Money Laundering Reporting Officer
<b>Tabcorp</b>	Adam Rytenskild, CEO and Managing Director John Fitzgerald, CFO
<b>Interstate casino regulators and monitors</b>	
<b>Kroll Australia Pty Ltd (NSW)</b>	Gary Gill, Managing Director, Head of Investigations Amanda Wood, Managing Director, Forensic Investigations and Intelligence
<b>NSW Independent Casino Commission (NICC)</b>	Philip Crawford, Chief Commissioner Murray Smith, Commissioner Craig Sahlin, Commissioner
<b>Office of the Independent Monitor (WA)</b>	Paul Steel APM, Independent Monitor Jane Hammond, Deputy Independent Monitor
<b>The Star Entertainment Group</b>	Nick Weeks, Manager – The Star Sydney, Special Manager – The Star Gold Coast and The Star Treasury Brisbane Lachlan Minogue, Assistant to the Manager
<b>Victorian Government</b>	
<b>Department of Justice and Community Safety (DJCS)</b>	Toby Hemming, Deputy Secretary, Integrity, Regulation and Legal Services John Katsoulas, Executive Director, Integrity, Regulation and Legal Services Simon Grieve, Executive Director, Gaming and Liquor
<b>Royal Commission into the Casino Operator and Licence (RCCOL)</b>	The Honourable Raymond A Finkelstein AO, KC

Organisation	Key contacts
<b>Victoria Police (VicPol)</b>	Shane Patton, Chief Commissioner Ross Guenther APM, Deputy Commissioner, Public Safety and Security Portfolio Robert Hill, Assistant Commissioner, Crime Command Christopher Gilbert, Assistant Commissioner, Intelligence and Covert Support Command Anthony Glenane, Detective Superintendent, State Intelligence Division, Intelligence and Covert Support Command Alicia Woods, Divisional Intelligence Manager, State Intelligence Division, Intelligence and Covert Support Command
<b>Victorian Gambling and Casino Control Commission (VGCCC)</b>	Fran Thorn, Chair Annette Kimmitt AM, CEO Scott May, Deputy CEO and Executive Director, Regulatory Operations Sharon Concisom, Executive Director, Legal, Policy and Harm Minimisation Adam Ockwell, Executive Director, Casino Operations Peter Tsyer, Strategic Project Director, Crown Suitability Decision
<b>Victorian Responsible Gambling Foundation (VRGF)</b>	Shane Lucas, CEO Brett Hetherington, Manager, Office of the CEO

## Appendix C: Crown Board, Board committee and management committee meetings attended by the Special Manager and/or OSM representatives from 1 July to 31 December 2023

The attendance of the Special Manager and/or OSM representatives at the relevant Board or committee meeting is indicated by the blue highlighting. Dates that are not highlighted indicate that the Special Manager and/or OSM representatives did not attend.

### Crown Resorts Limited

Current board or committee	Purpose	Current Chair	Charter/other updates OSM attendance						
<b>Crown Resorts Board</b>	Guides and monitors Crown Resorts on behalf of shareholders. Responsible for identifying areas of significant business risk and ensuring arrangements are in place to adequately manage those risks.	Mr William McBeath, Chairperson and Independent Non-Executive Director – Crown Resorts	An updated Board Charter was scheduled for approval in August 2023 but was deferred until February 2024.						
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec
			<b>Date</b>			26†*			8†*
<b>Crown Resorts Risk, Compliance and Responsible Gaming Committee</b>	Assists the Crown Resorts Board to fulfil its corporate governance responsibilities by identifying, monitoring, managing and mitigating issues and risks in accordance with the Risk Management Framework, risk profile and risk appetite for Crown Resorts, compliance and responsible gaming frameworks, and workplace health and safety systems.	Mr Stephen Revell, Non-Executive Director – Crown Resorts	The Charter for this committee was last approved in February 2023. No significant updates to note.						
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec
			<b>Date</b>		23†*				

† Meetings held simultaneously with Crown Melbourne Limited, Crown Resorts Limited and Burswood Limited.

\* Special purpose meetings, briefings or workshops on particular issues and reform initiatives attended by OSM representatives.

## Crown Melbourne Limited

Current board or committee	Purpose	Current Chair	Updates and OSM attendance						
<b>Crown Melbourne Board</b>	Guides and monitors Crown Melbourne, and is ultimately accountable for the operations and conduct of the business.	Mr Ian Silk, Chairperson and Independent Non-Executive Director – Crown Melbourne	An updated Crown Melbourne Board Charter was approved in July 2023.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	4*, 12*, 26, 27*	7*, 17*, 21	20, 20*, 26†*	20, 20*	15	8†*, 11, 19*, 21*
<b>Crown Melbourne Audit and Finance Committee</b>	Assists the Crown Melbourne Board to fulfil its corporate governance responsibilities in relation to financial reporting, financial risks, accounting practices, internal audit and external audit.	Ms Mary Waldron, Independent Non-Executive Director – Crown Melbourne	The Charter for this committee was last approved in February 2023. The Chair changed from Mr Stephen Revell (Non-Executive Director – Crown Resorts) in July 2023.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>		9		4		6
<b>Crown Melbourne People and Culture Committee</b>	Assists the Crown Melbourne Board on the implementation and operation of Crown Melbourne's people management practices and obligations, organisational transformation and cultural change.	Ms Helen Silver AO, Independent Non-Executive Director – Crown Melbourne	The Charter for this committee was last approved in February 2023. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>		9		4		6
<b>Crown Melbourne Risk, Compliance and Responsible Gaming Committee</b>	Assists the Crown Melbourne Board to fulfil its corporate governance responsibilities by identifying, monitoring, managing and mitigating issues and risks in relation to risk management, compliance, responsible gaming, and workplace health and safety.	Ms Henriette Rothschild, Independent Non-Executive Director – Crown Melbourne	The Charter for this committee was last approved in February 2023. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>		9, 23†*		4		6

† Meetings held simultaneously with Crown Melbourne Limited, Crown Resorts Limited and Burswood Limited.

\* Special purpose meetings, briefings or workshops on particular issues and reform initiatives attended by OSM representatives.

## Committees that have responsibility for subject matter ultimately reported to the Executive Risk and Compliance Committee and/or Board committees

Current board or committee	Purpose	Current Chair	Updates and OSM attendance						
<b>Crown Melbourne Executive Risk and Compliance Committee</b>	Assists the Crown Resorts CEO, Crown Melbourne CEO and Crown Melbourne Board and committees in assessing material risks, reviewing actions to mitigate risks, implementing the compliance program, fulfilling legal compliance obligations, and embedding the desired risk and compliance culture across the organisation.	Mr Mike Volkert, CEO – Crown Melbourne	The Charter for this committee was updated in September 2023 to align with the Crown Resorts Executive Risk and Compliance Committee Charter.  Further revisions have been made to the Charter and are expected to be presented to the committee's first meeting in 2024 for approval.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	19		13		15	
<b>Crown Melbourne Compliance and Regulatory Affairs Breach Determination Forum (BDF)</b>	A decision-making forum responsible for considering an event and determining whether it is reportable to state and/or federal regulator(s) on either a voluntary or mandatory basis. Each Crown Group property has a BDF governed by the Crown Group Terms of Reference.	Mr Mike Volkert, CEO – Crown Melbourne  Mr Mark Mackay, COO – Crown Melbourne	The Terms of Reference for this forum were updated in October 2023 to include the monthly review of trend data.  The updated Terms of Reference state that the committee is chaired by the property CEO, but in practice the COO chairs the committee.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	12, 31	9	13	11	15	13, 20, 22
<b>Crown Melbourne Investigations Committee</b>	Assesses and makes recommendations on proposed investigation plans, conduct of ongoing investigations and investigation reports. Makes referrals to the People and Culture team or law enforcement as required.	Mr Craig Walsh, Group EGM – Investigations – Crown Resorts	This committee does not currently have a Charter.  No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>		2	6			6
<b>Crown Melbourne Mandatory Carded Play and Mandatory Pre-Commitment Steering Committee</b>	Oversees the implementation of mandatory carded play and pre-commitment on electronic gaming machines, and of the changes required to meet the enhanced player activity statement legislative requirements.	Mr Peter Herring, Group EGM – Product, Strategy and Innovation – Crown Resorts	This committee does not currently have a Charter.  No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	3	10	13		9	12



Current board or committee	Purpose	Current Chair	Updates and OSM attendance						
<b>Crown Melbourne Patron Injury Committee</b>	Assesses incidents involving Crown Security that result in a patron being injured or claiming injury to consider whether improvements should be implemented or feedback given to employees involved in the incident.	Ms Carla Coslovich, EGM – Security – Crown Melbourne	The draft Charter for this committee is yet to be approved. No significant updates to note.						
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec
			<b>Date</b>	24	31		31		1
<b>Crown Melbourne Person of Interest (POI) Committee</b>	Ensures that Crown Melbourne remains free of criminal influence, exploitation and persons who are at high risk of gambling harm, by reviewing POIs who are brought to the committee's attention due to allegations of unacceptable behaviours and/or risk of gambling harm.	Mr Mark Mackay, COO – Crown Melbourne	The Charter for this committee was last approved in February 2023. It is expected to be reviewed in early 2024 as a result of Crown's review of its use of withdrawals of licence.						
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec
			<b>Date</b>	26	23		4		
<b>Crown Melbourne Responsible Gambling Code of Conduct Steering Committee</b>	Oversees the implementation of the changes imposed by the Ministerial Direction that established the Responsible Gambling Code of Conduct.	Mr Gary Carroll, EGM – Transformation – Crown Melbourne	This committee was established in July 2023 and is likely to cease operating by the end of 2023. This committee does not have a Charter.						
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec
			<b>Date</b>	13, 27	24	9	10		
<b>Crown Melbourne Responsible Gaming Management Committee</b>	Monitors and reviews gaming, responsible gaming and associated activities to ensure that Crown Melbourne provides a safe and responsible gaming environment that supports and drives harm minimisation.	Mr Luke Overman, General Manager – Crown PlaySafe Operations – Crown Melbourne	The Charter for this committee was last approved in August 2022. The committee is expected to be subsumed by the Crown Melbourne PlaySafe Oversight Committee once it is established in early 2024.						
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec
			<b>Date</b>			26			13
<b>Crown Melbourne Responsible Gaming Revocation Committee</b>	Reviews and evaluates all applications for revocation of self-exclusion or involuntary exclusion.	Mr Luke Overman, General Manager – Crown PlaySafe Operations – Crown Melbourne	The Charter for this committee was last approved in March 2023. No significant updates to note.						
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec
			<b>Date</b>	20	10, 17	21	19	23	21

Current board or committee	Purpose	Current Chair	Updates and OSM attendance						
<b>Crown Melbourne Responsible Service of Alcohol Steering Committee</b>	Takes a proactive role in ensuring that Crown demonstrates best industry practices in responsible service of alcohol practices and initiatives in a commercially viable and sustainable way.	Mr Mark Mackay, COO – Crown Melbourne	The Charter for this committee was last approved in October 2022. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	20	17		3, 19	16	
<b>Crown Melbourne Third Party Exclusion Committee</b>	An ad hoc committee that considers applications from concerned parties to initiate an exclusion process to protect and safeguard people whose gambling at Crown Melbourne may be causing harm to themselves or significant others.	Mr Luke Overman, General Manager – Crown PlaySafe Operations – Crown Melbourne	The Charter for this committee was last approved in September 2022. The committee held three meetings in October and November 2023. However, OSM representatives were not invited to these meetings due to an oversight by Crown.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>				3, 25	2	
<b>Crown Melbourne Transformation Steering Committee</b>	Reviews and monitors the implementation of the Crown Melbourne Transformation Program and discusses broader strategy and plans.	Mr Mike Volkert, CEO – Crown Melbourne	The Charter for this committee was last approved in June 2023, when it was updated to broaden the committee's remit to include strategic initiatives that sit outside the MRAP and change management. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	20	17	21	16	16	14
<b>Crown Resorts Executive Risk and Compliance Committee</b>	Assists the Crown Resorts CEO and Crown Resorts Board and committees in assessing material risks, reviewing actions to mitigate risks, implementing the compliance program, fulfilling legal compliance obligations, and embedding the desired risk and compliance culture across the organisation.	Mr Ciarán Carruthers, CEO – Crown Resorts	The Charter for this committee was last approved in September 2023. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	21					

Current board or committee	Purpose	Current Chair	Updates and OSM attendance							
<b>Crown Resorts Critical Risk Forum</b>	Ensures that Crown Resorts manages and mitigates the risk of criminal influence or exploitation, by reviewing critical risk customers who are brought to the attention of the Critical Risk Forum.	Mr Daniel Rule, Group EGM – Financial Crime and Compliance Operations – Crown Resorts	The Charter for this forum was last approved in May 2023. No significant updates to note.							
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec	
			<b>Date</b>	21		15				
<b>Crown Resorts Financial Crime Breach Determination Forum (FCBDF)</b>	Ensures there is a coordinated methodology and approach to identifying, reporting and assessing breaches or apparent breaches of Crown’s financial crime obligations. The FCBDF is a decision-making forum for financial crime events with responsibilities for escalating ML/TF breaches to the Crown Resorts Financial Crime Working Group or the Crown Resorts Financial Crime Oversight Committee, or directly to the Crown Resorts or Crown Entities Boards depending on materiality.	Ms Armina Antoniou, Group EGM – Financial Crime Risk (Money Laundering Reporting Officer) – Crown Resorts	The Charter for this committee was last approved in August 2022. No significant updates to note.							
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec	
			<b>Date</b>		11	8, 28		15, 21		
<b>Crown Resorts Financial Crime and Compliance Change Program (FCCCP) Design and Decision Forum</b>	Discusses progress of the FCCCP and seeks Executive Sponsor decision, approval, endorsement or guidance.	Ms Nicole Morehead, Head of Delivery and Change – Financial Crime and Compliance – Crown Resorts	The forum ceased operating in October 2023 as it had substantially fulfilled its remit.							
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec	
			<b>Date</b>	27	30		5			
<b>Crown Resorts Financial Crime Oversight Committee (FCOC)</b>	Assists the boards of Crown Resorts and each reporting entity within the Crown Resorts Designated Business Group in fulfilling its oversight responsibilities with respect to the Group’s exposure to financial crime risk. The FCOC monitors and assesses how well the financial crime compliance programs and initiatives of Crown Resorts and the designated business group entities are meeting Crown’s obligations under the AML/CTF Framework.	Mr Anthony Pearl, Chief Legal and Compliance Officer – Crown Resorts	The Charter for this committee was last approved in November 2023. No significant updates to note.							
			<b>2023</b>	Jul	Aug	Sep	Oct	Nov	Dec	
			<b>Date</b>	31	31	28		30		

Current board or committee	Purpose	Current Chair	Updates and OSM attendance						
<b>Crown Resorts Financial Crime Working Group (FCWG)</b>	Supports the FCOC to monitor and assess compliance with Crown's obligations within the AML/CTF Framework. This work includes assessing and providing oversight of Crown's operational compliance with its financial crime programs.	Ms Armina Antoniou, Group EGM – Financial Crime Risk (Money Laundering Reporting Officer) – Crown Resorts	The Charter for this committee was last approved in November 2023. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	27	31	26	31	28	
<b>Crown Resorts IT Steering Committee</b>	Provides oversight and direction for information systems and programs that impact the operations of Crown Resorts and its properties.	Ms Inez Kosovich, Chief Information Officer – Crown Resorts	The Charter for this committee was approved in July 2023.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>		31		30		
<b>Crown Resorts Crown Loyalty Steering Committee</b>	Oversees the operations of the Crown Rewards Loyalty Program, including by setting the vision and strategy for the program, and ensuring it functions efficiently, transparently, ethically, responsibly and in alignment with its goals and objectives.	Ms Kylie Burchmore, Group EGM – Commercial Strategy and Sales – Crown Resorts	This committee was established in November 2023, and is yet to finalise its Charter.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>					13	
<b>Crown Resorts People and Culture Technology Transformation Steering Committee</b>	Supports Crown's enterprise transformation and organisational capability uplift through the development of an integrated technological solution that will automate, simplify and standardise people and culture processes across the business.	Mr David Marks, Portfolio Director, Application Standardisation and Simplification – Crown Resorts	This committee was established in November 2022, and a Charter was approved in June 2023. The committee held a meeting on 10 July 2023. However, OSM representatives were not invited to this meeting due to an oversight by Crown.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	10		28			
<b>Crown Resorts Transaction Monitoring Council</b>	Provides oversight of the transaction monitoring program, including data, systems, rules and alerts. This work involves reporting to key stakeholders, including the FCWG.	Mr Daniel Rule, Group EGM – Financial Crime and Compliance Operations – Crown Resorts	The Charter for this committee was last approved in February 2023. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	25	29	26	31	28	

Current board or committee	Purpose	Current Chair	Updates and OSM attendance						
<b>Crown Resorts Whistleblower Committee</b>	Reviews and oversees disclosures made under the Whistleblower Policy. This work includes assessing whether a disclosure is an eligible disclosure, determining a course of action for investigation and deciding what, if any, remediation action is required.	Ms Martha Georgiou, Group EGM – Compliance and Regulatory Affairs – Crown Resorts	The Charter for this committee was last approved in February 2023. No significant updates to note.						
			<b>2023</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
			<b>Date</b>	5, 19	2, 16, 30	13, 27	11, 26	8, 14, 22	1, 11, 20

## Appendix D: Information Requests made to Crown and Crown's responses

Under section 36F of the Casino Control Act, the Special Manager can make formal statutory requests (Information Requests) to the Melbourne casino operator. In the final reporting period, the Special Manager issued seven Information Requests either to ensure that the OSM had all the information required for the preparation of this final report or where it was appropriate for the Special Manager to use his power to require information.

Since January 2022, the Special Manager has issued a total of 24 Information Requests. Details of each Information Request issued to Crown in the final and all previous reporting periods, including a summary of Crown's response to each Information Request, are set out in the following tables.

Over the course of the Special Manager's term, Crown has generally and satisfactorily given complete and timely responses to both Information Requests and informal requests and has provided large volumes of documents and extensive information to the OSM.

In relatively narrow circumstances and notwithstanding that such requests are not affected by any pre-existing duty of confidentiality, statutory prohibition or legal privilege, Crown has limited the information provided to the OSM, such as where it considered it was precluded from providing information due to Commonwealth legislative secrecy provisions. The Special Manager is satisfied this has not impeded the OSM's work.

At times, there have been delays in Crown providing information in response to the OSM's informal requests and queries. Such delays have usually been resolved through further communication with Crown or with the assistance of Crown's internal lawyers.

Over the course of the Special Manager's term, Crown has also routinely provided the OSM with documents such as Board papers and minutes, and correspondence with other government agencies, in line with Directions issued by the Special Manager. Crown has maintained a running list of all documents provided informally and formally to the OSM.

## Final reporting period: 1 July to 31 December 2023

Request No.	Date	Description of Request	Resulting actions
24.	7 December 2023	<ol style="list-style-type: none"> <li>1. Information in relation to whistleblower disclosures:               <ol style="list-style-type: none"> <li>a. total number of whistleblower disclosures across Crown Melbourne, Crown Sydney and Crown Perth</li> <li>b. number of whistleblower disclosures relating to Crown Melbourne</li> <li>c. number of whistleblower disclosures relating to Crown Melbourne that were determined to be protected disclosures</li> </ol> </li> </ol>	<p>Documents were provided on 12 December 2023.</p> <p>Crown advised that the provision of documents was completed on 15 December 2023.</p>
23.	23 November 2023	Any presentations or reports prepared by Mercer in relation to Crown's 2023 'Your Voice' survey for Crown Melbourne respondents	Documents were provided and Crown advised that the provision of documents was completed on 4 December 2023.
22.	3 November 2023	Complete results of Crown's 2023 'Your Voice' survey for Crown Melbourne respondents	Documents were provided and Crown advised that the provision of documents was completed on 10 November 2023.
21.	31 October 2023	<ol style="list-style-type: none"> <li>1. Documents relating to Crown's RSG training and resourcing:               <ol style="list-style-type: none"> <li>a. details of mandatory training courses offered in 2023</li> <li>b. completion rates for mandatory training courses</li> <li>c. feedback on training</li> <li>d. completed and planned internal and external reviews of training effectiveness</li> <li>e. training plan for 2024</li> <li>f. approach to skills testing and addressing skills gaps</li> <li>g. skills testing data and results</li> <li>h. resourcing forecasting model</li> </ol> </li> <li>2. Documents relating to Crown's risk and compliance functions:               <ol style="list-style-type: none"> <li>a. information in relation to specified training courses offered in 2023</li> <li>b. training courses to be delivered in 2024</li> <li>c. Chief Legal and Compliance Officer position description</li> <li>d. plan to extend obligations mapping and documenting obligations in Archer</li> </ol> </li> </ol>	<p>Documents were provided on 8 and 10 November 2023.</p> <p>Crown advised that the provision of documents was completed on 15 November 2023.</p>

Request No.	Date	Description of Request	Resulting actions
		<ul style="list-style-type: none"> <li>e. documents in relation to Crown Melbourne's Risk Appetite Measures and Risk Appetite Statement</li> <li>f. responses to each Blackhall &amp; Pearl recommendation accepted</li> </ul> <p>3. Documents relating to Crown's internal audit function:</p> <ul style="list-style-type: none"> <li>a. draft internal audit strategy</li> <li>b. risk management assurance processes</li> <li>c. assessments of Internal Audit team and resources</li> </ul> <p>4. Documents relating to a Crown Melbourne whistleblower disclosure</p>	
20.	18 October 2023	<p>1. Documents relating to Crown's IT:</p> <ul style="list-style-type: none"> <li>a. final version of Crown's Technology Future State strategy</li> <li>b. Crown Resorts' resource plan for Group Technology for 2024, 2025 and 2026 financial years</li> </ul> <p>2. Documents relating to Crown's readiness to comply with regulations 5 and 6 of the proposed <i>Casino Control Regulations 2023</i> (Vic):</p> <ul style="list-style-type: none"> <li>a. plan to comply, including milestones and due dates</li> <li>b. evidence of progress towards compliance</li> </ul>	<p>Documents were provided on 25 and 26 October and on 15 and 18 December 2023.</p> <p>Crown advised that the provision of documents was completed on 22 December 2023 other than in relation to the Technology Future State strategy not due to be approved until 2024.</p>
19.	9 October 2023	<p>1. Information in relation to Crown's 'Your Voice' survey and Culture Reform Program:</p> <ul style="list-style-type: none"> <li>a. results of Crown's 2023 'Your Voice' survey as at 18 October 2023 for Crown Melbourne respondents</li> <li>b. internal and external 'Your Voice' survey benchmarks for 2022 and 2023</li> <li>c. 'Culture Connect' presentation</li> <li>d. specified data from the 2023 financial year performance management cycle</li> <li>e. Thrive Leadership Development Program data and information</li> <li>f. results of other surveys and focus groups</li> <li>g. middle manager monthly turnover rates</li> </ul>	<p>Documents were provided on 11, 12, 16, 18, 19 and 25 October and 10 November 2023.</p> <p>Incomplete 2023 'Your Voice' survey results were provided on 19 October 2023. Complete survey results were provided on 25 October 2023.</p> <p>Crown required extensions of time to respond to parts of the request.</p> <p>Crown advised that the provision of documents was completed on 14 November 2023.</p>



Request No.	Date	Description of Request	Resulting actions
		2. Documents supporting completion of management actions arising out of internal audit reports relating to responsible gaming play periods and training, the Player Health Strategy, withdrawals of licence and whistleblower processes	
18.	12 September 2023	<ol style="list-style-type: none"> <li>1. Documents relating to Crown's integrity framework:               <ol style="list-style-type: none"> <li>a. draft anti-bribery and corruption vulnerability assessment</li> <li>b. current anti-bribery and corruption online training module</li> <li>c. status report in relation to Crown's 2022 anti-bribery and corruption thematic review</li> <li>d. information and documents in relation to Crown's bribery and corruption risk profiles</li> </ol> </li> <li>2. Documents relating to a number of Crown Melbourne whistleblower disclosures and investigations</li> </ol>	<p>Documents were provided on 19 September 2023.</p> <p>The OSM requested further compliance on 3 October 2023 in relation to specified whistleblower complaints, and Crown complied on 10 October 2023.</p> <p>Crown advised that the provision of documents was completed on 10 October 2023.</p>

### Third reporting period: 1 January to 30 June 2023

Request No.	Date	Description of Request	Resulting actions
17.	11 May 2023	<ol style="list-style-type: none"> <li>1. Documents relating to Crown's use of withdrawals of licence:               <ol style="list-style-type: none"> <li>a. list of all withdrawals of licence issued by Crown Melbourne in 2022 and 2023 to date</li> <li>b. processes, policies and/or workplace instructions for withdrawals of licence</li> <li>c. copies of relevant internal and external legal advice</li> </ol> </li> <li>2. Documents relating to Crown's approach to AFL clubs offering sponsorship:               <ol style="list-style-type: none"> <li>a. details of Crown's engagement with AFL clubs</li> <li>b. key documents relating to Crown's approach to AFL clubs</li> <li>c. details of Crown's future approach to sponsorship from a RSG perspective</li> </ol> </li> <li>3. Further updates on the outcomes of Project Peyo in relation to money laundering in patron accounts</li> <li>4. Details and key documents in relation to Crown's International Business team</li> </ol>	<p>Documents were provided on 18 and 26 May 2023.</p> <p>Crown advised that the provision of documents was completed on 2 June 2023, other than in relation to documents required to be provided on an ongoing basis.</p>

Request No.	Date	Description of Request	Resulting actions
		5. Details of Crown's risk assessment and monitoring of contractor compliance with labour hire licensing obligations	
16.	6 April 2023	<ol style="list-style-type: none"> <li>1. Documents relating to Crown Melbourne's Business Operations team: <ol style="list-style-type: none"> <li>a. meeting documents from 1 January 2023 to date</li> <li>b. ongoing provision of meeting documents</li> </ol> </li> <li>2. Documents relating to a customer complaint</li> <li>3. Update on how Crown addressed recommendations from external reviews and internal audits in relation to controlled contracts</li> </ol>	<p>Documents were provided on 12 and 14 April 2023.</p> <p>Crown advised that the provision of documents was completed on 14 April 2023, other than in relation to documents required to be provided on an ongoing basis.</p>

### Second reporting period: 1 July to 31 December 2022

Request No.	Date	Description of Request	Resulting actions
15.	2 November 2022	<ol style="list-style-type: none"> <li>1. Documents relating to Crown's culture and transformation: <ol style="list-style-type: none"> <li>a. 'middle management' profile – summary statistics</li> <li>b. examples of new leadership communications</li> <li>c. samples of 'old' versus 'new' training materials in relation to financial crime</li> <li>d. current business targets by function</li> <li>e. resourcing statistics</li> <li>f. certain Board and management committee papers</li> </ol> </li> </ol>	<p>Documents were provided on 9 and 28 November 2022.</p> <p>Crown advised that the provision of documents was completed on 28 November 2022.</p>
14.	3 October 2022	<ol style="list-style-type: none"> <li>1. RSG at Crown: <ol style="list-style-type: none"> <li>a. current and recommended processes for monitoring exclusions</li> <li>b. specified research proposals, reports, data and studies</li> <li>c. translation capabilities</li> <li>d. customer communications strategies and guidelines</li> </ol> </li> </ol>	<p>Documents were provided and Crown advised that the provision of documents was completed on 10 October 2022.</p>

Request No.	Date	Description of Request	Resulting actions
13.	27 September 2022	<ol style="list-style-type: none"> <li>1. Integrity framework materials: <ol style="list-style-type: none"> <li>a. Crown's revised draft Code of Conduct</li> <li>b. training materials in relation to the Code of Conduct</li> <li>c. Internal Audit whistleblower report</li> <li>d. current and revised policies in relation to fraud, anti-bribery and corruption, conflicts of interest, whistleblower protection, employment, recruitment, workplace conduct and so on</li> <li>e. workplace instructions and training</li> </ol> </li> <li>2. Reports made to the AUSTRAC CEO pursuant to section 41(2) of the AML/CTF Act</li> </ol>	<p>Documents were provided on 4 and 11 October 2022.</p> <p>Crown advised that the provision of documents was completed on 11 October 2022.</p>
12.	20 September 2022	<ol style="list-style-type: none"> <li>1. Documents relating to Crown's management of controlled contracts, including records maintained in accordance with the Controlled Contracts Standard Operating Procedures: <ol style="list-style-type: none"> <li>a. details of specified controlled contracts</li> <li>b. due diligence checks</li> <li>c. recommendations and outcomes relating to specified controlled contracts</li> </ol> </li> <li>2. Terms of reference for Mr Peter Deans in respect of recent work undertaken associated with Crown's risk management program</li> </ol>	<p>Documents were provided and Crown advised that the provision of documents was completed on 29 September 2022.</p>
11.	6 September 2022	<ol style="list-style-type: none"> <li>1. Design and implementation of facial recognition technology at Crown Melbourne: <ol style="list-style-type: none"> <li>a. relevant privacy, security and technology policies</li> <li>b. relevant standard operating procedures</li> <li>c. relevant internal control statements</li> <li>d. reports and submissions in response to recommendation 12 of the Sixth Review</li> <li>e. other submissions, reports, legal advice and project plans</li> </ol> </li> </ol>	<p>Documents were provided and Crown advised that the provision of documents was completed on 13 September 2022.</p>
10.	23 August 2022	<ol style="list-style-type: none"> <li>1. Documents relating to Crown's tax compliance: <ol style="list-style-type: none"> <li>a. all letters from the ATO to the Crown Resorts CEO for the past five years</li> </ol> </li> </ol>	<p>Documents were provided on 26 and 30 August 2022.</p> <p>Crown advised that the provision of documents was completed on 30 August 2022.</p>

Request No.	Date	Description of Request	Resulting actions
		<ul style="list-style-type: none"> <li>b. all ATO assurance reports issued to Crown Resorts for the past five years</li> <li>2. Current draft of Project Peyo report – an internal report relevant to items 6 to 8 of Appendix I of the Finkelstein Report, being Crown’s response to indicators of money laundering in patron accounts identified by McGrathNicol</li> <li>3. RSG documents: <ul style="list-style-type: none"> <li>a. Independent Responsible Gaming Advisory Panel Report</li> <li>b. status of findings of the Internal Audit team’s report into responsible gaming</li> <li>c. responsible gaming complaints</li> <li>d. Responsible Gaming Annual Compliance Plan for FY21 and FY22</li> <li>e. documents relating to the content of the Crown Responsible Gaming website</li> </ul> </li> </ul>	
9.	19 July 2022	<ul style="list-style-type: none"> <li>1. Crown’s FY21 Internal Audit Plan and FY22 Internal Audit: Customer Risk Assessment (Betfair)</li> <li>2. Documents relevant to Crown’s whistleblower policy and processes: <ul style="list-style-type: none"> <li>a. investigation notes, meeting minutes, correspondence and reports in relation to specified complaints</li> <li>b. whistleblower register</li> <li>c. training materials</li> <li>d. scope of Internal Audit whistleblower review</li> </ul> </li> </ul>	<p>Documents were provided on 26 and 27 July 2022. While whistleblower documents were initially redacted on the basis of Commonwealth legislative secrecy, unredacted documents were subsequently provided.</p> <p>The OSM requested further compliance on 8 August 2022 in relation to specified whistleblower complaints, and Crown complied on 16 August 2022.</p> <p>Crown advised that the provision of documents was completed on 18 August 2022.</p>

## First reporting period: 1 January to 30 June 2022

Request No.	Date	Description of Request	Resulting actions
8.	2 June 2022	<ol style="list-style-type: none"> <li>1. Additional documents relevant to Crown's culture change program</li> <li>2. Documents relevant to Crown's Risk Uplift Program:               <ol style="list-style-type: none"> <li>a. most current draft of the root cause analysis</li> <li>b. any feedback from Mr Peter Deans in reviewing the draft risk management document suite</li> </ol> </li> <li>3. Documents relevant to RSG:               <ol style="list-style-type: none"> <li>a. Play Periods Policy</li> <li>b. papers and meeting minutes of the Crown Resorts Responsible Gaming Committee</li> <li>c. papers and meeting minutes of the Crown Melbourne Responsible Gaming Management Committee</li> </ol> </li> <li>4. Most recent version in Crown's possession of the Kroll <i>Crown Monitorship Report – Phase 1 Report</i></li> </ol>	<p>An initial set of documents was provided on 9 June 2022, with further documents provided on 23 June 2022.</p> <p>The OSM considered whether it would wish to inspect some sensitive documents on site. On 25 October 2022, the OSM informed Crown that facilitating inspection would not be required and that the provision of documents was considered complete on 24 June 2022.</p> <p>The final Kroll <i>Crown Monitorship Report – Phase 1 Report</i> was provided directly to the OSM by Kroll on 10 June 2022.</p>
7.	13 May 2022	Range of documents relevant to Crown's culture change program as referenced in the Crown Culture Project Plan	Documents were provided and Crown advised that the provision of documents was completed on 18 May 2022.
6.	7 April 2022	<ol style="list-style-type: none"> <li>1. Reports referred to in Crown Resorts' Financial Crime Oversight Committee meeting on 31 March 2022:               <ol style="list-style-type: none"> <li>a. Current State Assessment by PwC</li> <li>b. Exiger Independent Review Report</li> <li>c. AUSTRAC Annual Compliance Report</li> <li>d. Enterprise Wide-Risk Assessment Report</li> </ol> </li> <li>2. Meeting papers associated with the 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> </ol>	<p>Documents were provided on 18 April and 5 May 2022.</p> <p>Crown advised that the provision of documents was completed on 16 June 2022.</p>

Request No.	Date	Description of Request	Resulting actions
		<ol style="list-style-type: none"> <li>4. Submissions, reports and so on referred to in the Finkelstein Report</li> <li>5. Ongoing provision of certain parts of Crown Resorts Board papers</li> </ol>	
5.	17 March 2022	<p>Policy Uplift Program:</p> <ol 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> </ol>	<p>Documents were provided and Crown advised that the provision of documents was completed on 29 March 2022. The OSM requested further compliance on 20 April 2022 in relation to certain policies, and Crown complied on 29 April 2022.</p>
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: <ol 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> </ol> </li> </ol>	<p>Documents were provided and Crown advised that the provision of documents was completed on 11 March 2022. The OSM requested further compliance on 20 April 2022 in relation to certain policies, and Crown complied on 29 April 2022.</p>
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>	<p>Documents were provided and Crown advised that the provision of documents was completed on 11 March 2022. 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.</p>

Request No.	Date	Description of Request	Resulting actions
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>	<p>Documents were provided on 11 and 24 February 2022.</p> <p>Crown advised that the provision of documents was completed on 3 March 2022.</p>
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>	<p>Documents were provided on 17, 19, 20, 21 and 31 January and 1, 3, 4 and 18 February 2022.</p> <p>Crown advised that the provision of documents was completed on 3 March 2022, other than in relation to documents required to be provided on an ongoing basis.</p> <p>The OSM requested further compliance on 12 April 2022 in relation to 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.</p>

## Appendix E: Directions made to Crown and Crown's responses

Under section 36E of the Casino Control Act, the Special Manager has statutory powers to give Directions to the Melbourne casino operator either to take any action specified or to refrain from taking any action specified. There are three grounds for exercising these powers: suspected maladministration, Crown's best interests and to ensure compliance with Crown's statutory obligations.

The Special Manager issued four new Directions to Crown in this reporting period. Each Direction was based on Crown's best interests, having regard to the Special Manager's objectives and functions.

Crown did not make any written submissions in response to the Special Manager's Notices of Intention to give Directions, each of which the OSM discussed verbally with Crown before issuing.

Since January 2022, the Special Manager has issued a total of 29 Directions. Details of each Direction issued in the final and all previous reporting periods, including Crown's overall compliance with each Direction, are set out in the following tables.

Over the course of the Special Manager's term, Crown has cooperatively engaged with the OSM on all Directions. While, as noted in this appendix, Crown's level of compliance with all Directions has varied, it has complied with all Directions to date, and to an acceptable standard.

Crown provided a self-assessment of its compliance with Directions 1–27, which assisted the OSM in making its overall assessment as set out in this appendix. Directions 28 and 29, relating to the Melbourne Transformation Plan, were issued in mid-December 2023 and apply on an ongoing basis. As such, it is too early for the OSM to assess Crown's resulting actions and overall compliance.



## Final reporting period: 1 July to 31 December 2023

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
29.	15 December 2023 (Notice) 20 December 2023 (Direction)	<p>In complying with Direction 28, Crown must:</p> <ul style="list-style-type: none"> <li>ensure any changes to the Melbourne Transformation Plan do not compromise the strategic intent or key deliverables of the Melbourne Transformation Strategy</li> <li>implement the Governance Framework and Assurance Model approved by the Crown Melbourne Board</li> <li>provide to the OSM all papers related to the Melbourne Transformation Plan, including change requests, scorecards and status reports, simultaneously with their distribution to the Board and committees outlined in the Governance Framework</li> <li>advise the OSM of all approved change requests to the Melbourne Transformation Plan within two business days of approval.</li> </ul>	Too early to assess.	Too early to assess.
28.	15 December 2023 (Notice) 20 December 2023 (Direction)	Crown must continue to implement, maintain and update the Melbourne Transformation Plan, approved by the Crown Melbourne Board on 11 December 2023, or as subsequently amended with the Board's approval.	Too early to assess.	Too early to assess.
27.	20 July 2023 (Notice) 20 July 2023 (Direction)	Crown to delete and destroy forthwith all copies of drafts of the third interim report by the Special Manager or parts thereof and must use best endeavours to ensure that Crown Resorts also deletes and destroys all such copies in its possession or control, other than a single copy of each such draft document, which is to be securely stored in the manner required by Direction 26.	Crown expressly waived its right to make submissions, enabling this Direction to take immediate effect.	Crown complied with the Direction.

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
26.	20 July 2023 (Notice) 20 July 2023 (Direction)	Crown to comply with the strict confidentiality requirements agreed to in the Letter of Agreement dated 20 July 2023 in relation to any disclosure to it of the Special Manager's June 2023 interim report.	Crown expressly waived its right to make submissions, enabling this Direction to take immediate effect.	Crown complied with the Direction.

### Third reporting period: 1 January to 30 June 2023

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
25.	4 April 2023 (Notice) 7 April 2023 (Direction)	Crown to provide, by 2 May 2023, a draft self-assessment describing the status of Crown's progress as at 30 March 2023 towards acquitting relevant matters in Appendix I of the Finkelstein Report.	Crown provided its draft self-assessment on 2 May 2023.	Crown complied with the Direction.
24.	24 February 2023 (Notice) 24 February 2023 (Direction)	Crown may maintain a single copy of the Special Manager's June 2022 and December 2022 interim reports on its Diligent platform <sup>1</sup> without password protection, access to which must be limited to: <ul style="list-style-type: none"> <li>• directors of Crown Melbourne Limited</li> <li>• directors of Crown Resorts Limited</li> <li>• members of Crown's company secretary team required to maintain access permissions for Diligent,</li> </ul> provided those persons have otherwise complied with the requirements of Direction 21.	Crown expressly waived its right to make submissions, enabling this Direction to take immediate effect, facilitating ready access for directors to the Special Manager's interim reports.	Crown complied with the Direction.

<sup>1</sup> Board paper distribution application.

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
23.	21 February 2023 (Notice) 24 February 2023 (Direction)	From 10 February 2023, Crown to provide the regular monthly status report on the progress of Crown's MRAP (as required by Direction 12) no later than three business days prior to each Crown Melbourne Transformation Steering Committee meeting.	Crown continued to comply, with minor delays from time to time.	Crown substantially complied with the Direction.
22.	15 February 2023 (Notice) 21 February 2023 (Direction)	Crown to delete and destroy all copies of draft interim reports or parts thereof and must use best endeavours to ensure that Crown Resorts also deletes and destroys all such copies in its possession or control, other than a single copy of each such draft document, which is to be securely stored in the manner required by Direction 21, and is only to be used for the purpose of ensuring that Crown complies with any legal requirements.	Crown made submissions in response to the Notice of Intention on 20 February 2023 requesting permission to retain a single copy of the Special Manager's draft interim reports.  The Special Manager amended the Direction to assist Crown in meeting its record-keeping and other legal obligations, and the final version of the Direction was issued on 21 February 2023.	Crown complied with the Direction.
21.	15 February 2023 (Notice) 20 February 2023 (Direction)	Crown to comply with the strict confidentiality requirements previously agreed to in Letters of Agreement dated 15 July 2022 and 15 February 2023 in relation to the disclosure of the Special Manager's June 2022 and December 2022 interim reports.	Crown confirmed that it was putting internal measures in place to comply with the confidentiality requirements.	Crown complied with the Direction.

### Second reporting period: 1 July to 31 December 2022

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
20.	6 September 2022 (Notice) 9 September 2022 (Direction)	Crown to immediately notify the Special Manager upon scheduling any meeting of the Crown Resorts Board or its committees at which it is intended to discuss matters that relate to or in any way concern Crown Melbourne.	There was one early instance of inadvertent non-compliance with this Direction.	Crown substantially complied with the Direction.

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
19.	12 July 2022 (Notice) 15 July 2022 (Direction)	The OSM to be kept informed of all Crown's dealings with local government authorities in Victoria, including the City of Melbourne.	Crown was able to implement this Direction across the business in the course of a month, extending the system it implemented in the first reporting period to capture correspondence and records for Directions 4 and 11.  Crown sustained a regular fortnightly upload of correspondence and records to the OSM.  The OSM and Crown continued to liaise about the kinds of correspondence and records that needed to be provided.  Delays or missed communications were remediated.	Crown substantially complied with the Direction.
18.	12 July 2022 (Notice) 15 July 2022 (Direction)	Circular Resolutions sent to Crown Resorts directors that relate to or in any way concern the affairs of Crown Melbourne to be sent to the Special Manager at the same time.	Crown continued to comply.	Crown complied with the Direction.
17.	12 July 2022 (Notice) 15 July 2022 (Direction)	Circular Resolutions sent to Crown Melbourne directors to be sent to the Special Manager at the same time.	On a limited number of occasions, Crown provided circular resolutions later than they were sent to Crown Melbourne directors.	Crown substantially complied with the Direction.
16.	12 July 2022 (Notice) 15 July 2022 (Direction)	Crown to provide all appendices, annexures and attachments (howsoever named) referred to in information given in response to future Information Requests or Directions.	Crown continued to comply.	Crown complied with the Direction.
15.	12 July 2022 (Notice) 15 July 2022 (Direction)	Crown to provide all appendices, annexures and attachments (howsoever named) referred to in information given in response to previously made Information Requests or Directions.	Crown continued to comply.	Crown complied with the Direction.
14.	12 July 2022 (Notice) 15 July 2022 (Direction)	Any future request for information under section 36F is to be treated as including a request for updated information in respect of the subject matter of that request.	Crown continued to comply.	Crown complied with the Direction.

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
13.	12 July 2022 (Notice) 15 July 2022 (Direction)	Any request for information previously made under section 36F of the Casino Control Act to be treated as including a request for updated information in respect of the subject matter of that request.	Crown continued to comply.	Crown complied with the Direction.

### First reporting period: 1 January to 30 June 2022

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
12.	10 May 2022 (Notice) 13 May 2022 (Direction)	Crown to provide the OSM with a regular monthly status report on the progress of Crown's draft MRAP.	Crown complied with Direction 12 by providing its Transformation Steering Committee meeting packs in a timely way.	Crown complied with the Direction.
11.	11 March 2022 (Notice) 14 March 2022 (Direction)	Crown to keep the OSM 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.	In the first reporting period, Crown implemented a new internal system to capture correspondence and records so that they could be provided to the OSM.  Crown sustained a regular fortnightly upload of correspondence and records to the OSM.  The OSM and Crown continued to liaise about the kinds of correspondence and records that need to be provided.  Delays or missed communications were remediated.	Crown substantially complied with the Direction.
10.	9 March 2022 (Direction)	Crown to provide the OSM with a draft of the plan referenced in Direction 9 by 31 March 2022.	Crown provided a draft high-level version of the MRAP, in partial compliance with Directions 9 and 10.	Crown partially complied with the Direction.
9.	2 March 2022 (Notice) 9 March 2022 (Direction)	Crown 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.	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.  The Special Manager informed Crown on 8 March 2022 that the Direction would be made.  Associated correspondence was appended to the Special Manager's June 2022 interim report.	Crown partially complied with the Direction.

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
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 continued to comply.	Crown complied with the Direction.
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.	Crown substantially complied with the Direction.
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.	Crown complied with the Direction.
5.	20 January 2022 (Notice) 23 January 2022 (Direction)	Crown to 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. Throughout each reporting period, Crown limited the information provided to the OSM on the basis of Commonwealth legislative secrecy requirements.	Crown complied with the Direction to the extent it considered it was permitted to do so by law. Crown's redaction of information on the basis of Commonwealth legislative secrecy requirements did not impede the OSM's work.
4.	11 January 2022 (Notice) 17 January 2022 (Direction)	Crown to keep the OSM 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.	Crown responded to the Notice of Intention on 14 January 2022, stating that it agreed in principle but that the Direction could present practical challenges to Crown due to the volume of correspondence it would produce.  In the first reporting period, Crown implemented a new internal system to capture correspondence and records so that they could be provided to the OSM.  Crown sustained a regular fortnightly upload of correspondence and records to the OSM.  The OSM and Crown continued to liaise about the kinds of correspondence and records that need to be provided.  Delays or missed communications were remediated.	Crown substantially complied with the Direction.

Request No.	Date of Notice/Direction	Description of Request	Resulting actions	Overall compliance
3.	11 January 2022 (Notice) 17 January 2022 (Direction)	Crown to include the OSM on Crown's electronic distribution list of papers to Crown Board members.	In late January 2022, the Special Manager and Deputy Special Managers were provided access to Diligent.  Papers of meetings of the Board and its committees were also consistently provided to the OSM.	Crown complied with the Direction.
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 did not provide documents before the required date in the final reporting period.  While documents were sometimes provided after the required date, this did not affect the OSM's work.	Crown substantially complied with the Direction.
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.	Crown complied with the Direction.

# Appendix F: OSM analysis of Crown's employee surveys



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# 1. Introduction

## 1.1 Background

Since the Finkelstein Royal Commission, Crown has undertaken employee surveys over three consecutive years to understand how employees perceive various aspects of the organisation's culture:

- the 2021 'Culture at Crown' survey was conducted in May 2021 by Deloitte and included 59 questions related to employee engagement, values and behaviours. The survey achieved a completion rate of 57 per cent of employees across Crown<sup>1</sup>
- the 2022 'Your Voice' survey was conducted between November and December 2022 by Mercer and included 66 questions with similar topic coverage as the 2021 employee survey and additional questions on risk culture, responsible service of gambling (RSG), employee brand, motivation and engagement. The survey achieved a 52 per cent completion rate across all Crown employees, including 50 per cent of Crown Melbourne employees<sup>2</sup>
- the 2023 'Your Voice' survey was conducted in October 2023 by Mercer and included 32 questions on similar themes to previous surveys, with additional questions on employee engagement. The survey achieved a 58 per cent completion rate across all Crown employees, including 55 per cent of Crown Melbourne employees.<sup>3</sup>

Crown's employee surveys from 2021 to 2023 had 17 questions in common, which employees responded to using a five-point Likert scale ranging from 'strongly agree' to 'strongly disagree'. Throughout this appendix, the OSM has assessed survey results with reference to the percentage of 'favourable responses', which includes responses from employees who either 'strongly agreed' or 'agreed' with positively worded questions, or 'strongly disagreed' or 'disagreed' with negatively worded questions.

The 2023 employee survey also provided employees with the opportunity to respond in free text to a question about changes they had observed over the previous 12 months. Around 1,700 individuals provided free text responses in response to this question.

Mercer also provided Crown and the OSM with access to its external benchmark data set, which reflects survey responses collected from 71,000 participants across 86 Australian companies over the past five years.

## 1.2 Purpose and objectives

The purpose of this appendix is to summarise the insights arising from the OSM's independent review and analysis of Crown Melbourne's 2023 employee survey results. It focuses on areas where there is evidence of culture change within Crown Melbourne since the 2021 and 2022 employee surveys were undertaken.

The objective of the OSM's analysis has been to identify the extent to which culture change has progressed in areas highlighted by the Finkelstein Royal Commission, including psychological safety, compliance culture and commitment to RSG. It also sought to identify whether there are employee perceptions that could present a risk to the sustainability of Crown's ongoing cultural reform program, such as a lack of confidence in its leadership.

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<sup>1</sup> Mercer, Crown 'Your Voice' Survey 2023 – Crown Melbourne Results Presentation, November 2023, p. 3.

<sup>2</sup> Mercer, *Crown Culture Survey and Analysis Report*, 25 May 2023, p. 50.

<sup>3</sup> Mercer, Crown 'Your Voice' Survey 2023 – Crown Melbourne Results Presentation, November 2023, pp. 3, 6.

## 1.3 Summary of methodology

The OSM independently reviewed and analysed Melbourne-specific data from the 2023 employee survey, as well as the 2021 and 2022 surveys, by:

- comparing the favourable responses for the 17 common questions included in the three surveys
- identifying areas where the rate of increase in favourable responses was statistically significant. In this data, results were statistically significantly different if they had changed by 5 per cent or more over the three-year period.

The OSM also systematically analysed the themes and sentiment of free text responses provided by Crown Melbourne participants in response to the 2023 survey question 'Please share any observations you have about changes in Crown's culture over the last 12 months.' The OSM coded comments using a standard content analysis method which involved reviewing each response and categorising it according to topics. Comments that referenced multiple topics and/or sentiments were coded to all relevant codes to reflect the complexity of responses.

These free text comments cannot be considered conclusive or singularly reliable. For example, employees may be more likely to respond to these kinds of free text questions to express negative experiences. Nevertheless, analysis of them provides insights into employee perceptions of change, and has been considered alongside the survey data in forming observations. This appendix includes examples of these free text comments to illustrate key insights.

The OSM's analysis of Crown's employee survey responses is distinct from the analysis that Mercer has prepared for Crown on the same data (provided in Appendix 1, Document 1.11). In particular, the OSM's analysis has:

- focused primarily on areas specific to the Finkelstein Royal Commission where survey results are statistically significantly different between 2021 and 2023
- not focused on all aspects of Crown's employee surveys; for example, the 2023 survey included questions on general employee engagement which are less relevant to the Finkelstein Royal Commission findings.

The Annexure to this appendix includes further details regarding Crown's employee surveys and the OSM's survey analysis methodology and approach.

## 1.4 Structure of this appendix

This appendix is set out as follows:

- Section 2 provides a high-level summary of the OSM's survey analysis findings.
- Section 3 sets out examples of positive observations identified through the OSM's analysis.
- Section 4 sets out a number of areas where the OSM's analysis has identified ongoing improvement is required.

## 2. Overall survey conclusions

This section describes Crown’s overall progress in changing employee perceptions of its culture over the past three years.

The OSM’s analysis of Crown Melbourne’s employee survey data indicates that employees perceive the organisation’s culture is steadily improving in some areas. However, perceptions of change are stabilising in areas where there were early improvements, and employees are yet to observe widespread and sustained culture change.

The OSM compared the results of the 17 common questions included in the three surveys, focusing on areas where the rate of increase in favourable responses was statistically significant, that is, it had changed by more than 5 per cent over the three-year period.<sup>4</sup> Table 1 highlights the eight questions that achieved statistically significant increases.

*Table 1. Common questions with statistically significant increases over three-year period*

Area	Relevant question(s)
Senior leader role-modelling of Crown’s values	Executive and General Managers at Crown consistently behave in accordance with Crown’s values
Quality of feedback from supervisors	My manager(s) and/or supervisor(s) regularly gives me actionable feedback that helps me improve my performance
Freedom to make decisions	I have the freedom to make and act on decisions that are relevant to my role
Board role-modelling of Crown’s values	Board members at Crown consistently behave in accordance with Crown’s values
Management care for employee wellbeing	My manager(s) and/or supervisor(s) genuinely cares about my health and wellbeing
Prioritisation of rules and regulations	At Crown, following established rules, guidelines and regulations is a top priority
Confidence to raise concerns	I am confident that I will not be penalised for raising concerns The people I work with speak up and challenge each other if they think they are not doing the right thing

Over the three-year period, employee responses have indicated consistent improvement in:

- senior leaders role-modelling Crown’s values
- quality of feedback from supervisors (discussed further in section 3.4).

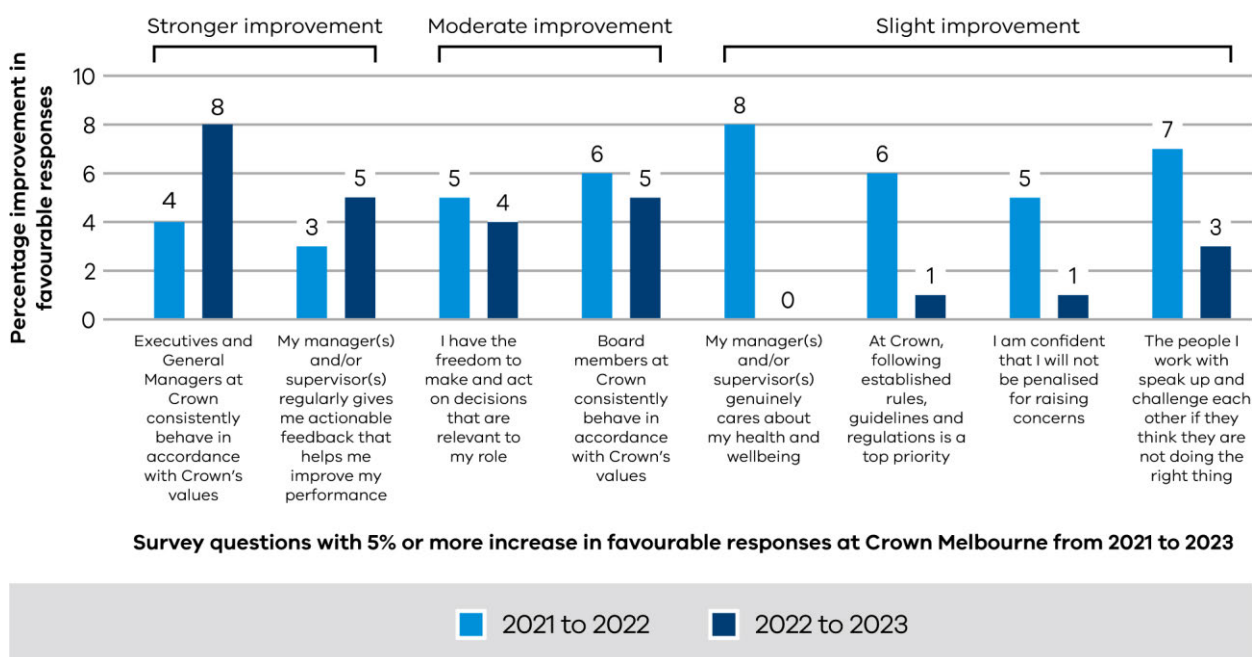
Progress has continued, but at a slightly slower pace, in:

- freedom to make decisions. Results for survey questions and free text comments suggest some employees continue to feel frustration at a lack of empowerment in their role (discussed further in section 4.4)
- Board role-modelling of Crown’s values. This may be due to a more stable period of Board membership following significant changes throughout 2021 and 2022.

<sup>4</sup> Five per cent is the lowest percentage difference cited as statistically significant by Mercer in its presentation to Crown (Crown ‘Your Voice’ Survey 2023 – Crown Melbourne Results Presentation, November 2023, p. 6).

For the other three areas of overall improvement, employee responses suggest the rate of progress has stabilised over the past year, as shown in Figure 1.

Figure 1. Pace of improvement as shown in Crown Melbourne employee responses to common survey questions between 2021 and 2023



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

These results may provide some evidence of change fatigue, which is difficult to avoid when organisations are transforming over a prolonged period, as Crown is.

There are also areas requiring further improvement that specifically link to identified root causes of Crown's historical failures. For example, Crown employees' favourable responses to the two 'confidence to raise concerns' questions continue to sit well below those at benchmark companies. Respondents' free text comments in the 2023 employee survey suggest that morale might be low for some employees, and there may be a degree of cynicism about the authenticity of change at Crown Melbourne (see sections 4.5 and 4.6).

In the 2023 survey, employees were asked to comment on the general environment of change over the past 12 months. The majority of free text comments on the specific topic of change highlight one or two areas such as RSG, and care for employee safety. A number of comments also contend that overall change has been limited, and some respondents suggested a negative trend in certain areas.

Overall results do not provide a complete picture of employee perceptions across the organisation. In some cases, employees' experience of the current culture, and changes over the previous 12 months, varies significantly among respondents at different levels and in different teams. The reasons for these differences are sometimes obvious; for example, more senior employees are likely to express more favourable views on their freedom to act on decisions relevant to their role. In other cases, the reasons are less clear. An example of this is the different perceptions across teams on questions about senior leadership role-modelling, on whether Crown has customers' best interests at heart and on fear of being penalised for speaking up. While Crown can use the overall survey results as a starting point for planning further reform, a more nuanced analysis of employee sub-groups would be beneficial to identify risk areas and to inform the design of effective interventions.

Sections 3 and 4 provide further detail regarding the OSM's analysis of Crown's employee surveys, including key insights, drawing on overall survey responses, identified differences between employee sub-groups and employee comments:

- Section 3 provides examples of positive observations of change at Crown Melbourne identified through the OSM's analysis.
- Section 4 identifies a number of areas where further improvement is needed.

Wherever possible, the OSM has compared the Crown employee survey results to available Mercer external benchmark data – described as the 'aspirational norm'. Some questions, such as 'I look forward to coming to work', elicit either more negative or more positive responses by their nature. Benchmarks from other companies help with interpreting responses to such questions by understanding what a 'typical' response might be. However, it is noted that the workforces of companies in other industries may not be directly comparable with Crown's workforce (for example, because Crown has a high proportion of casual employees).

# 3. Positive observations

## 3.1 Introduction

The OSM’s analysis of Crown’s employee survey results between 2021 and 2023 identified the positive observations outlined in Table 2.

Table 2. Positive observations from employee survey data

Section reference	Positive observation
3.2	Employees have greater confidence in senior leadership.
3.3	Employees have a better understanding of Crown’s whistleblower program.
3.4	Performance management is gaining momentum.
3.5	Most employees continue to be aware of Crown’s RSG commitment and understand the role they play.
3.6	There is strong recognition that compliance is important.

The following sections provide further detail on these observations and include illustrative free text comments from employees.

## 3.2 Employees have greater confidence in senior leadership

*I feel the positive culture change in higher management since Crown was taken over. I also believe there is more focus on the staff, to make them feel more valuable.*

*I believe that under Ciaran’s guidance, there has been a definitive change to the way our values have been displayed, demonstrated and celebrated.*

*There is no consistency when it comes to upper management. Executives have different opinions – major changes are communicated well but everyone has different ideas.*

Over the past three years, Crown’s employee surveys included two common questions related to senior leadership:

- whether senior leaders are effectively leading the organisation through change
- Executive and General Managers at Crown consistently behave in accordance with Crown’s values.

In addition, the 2023 survey included a question on whether senior leaders ‘walk the talk’.

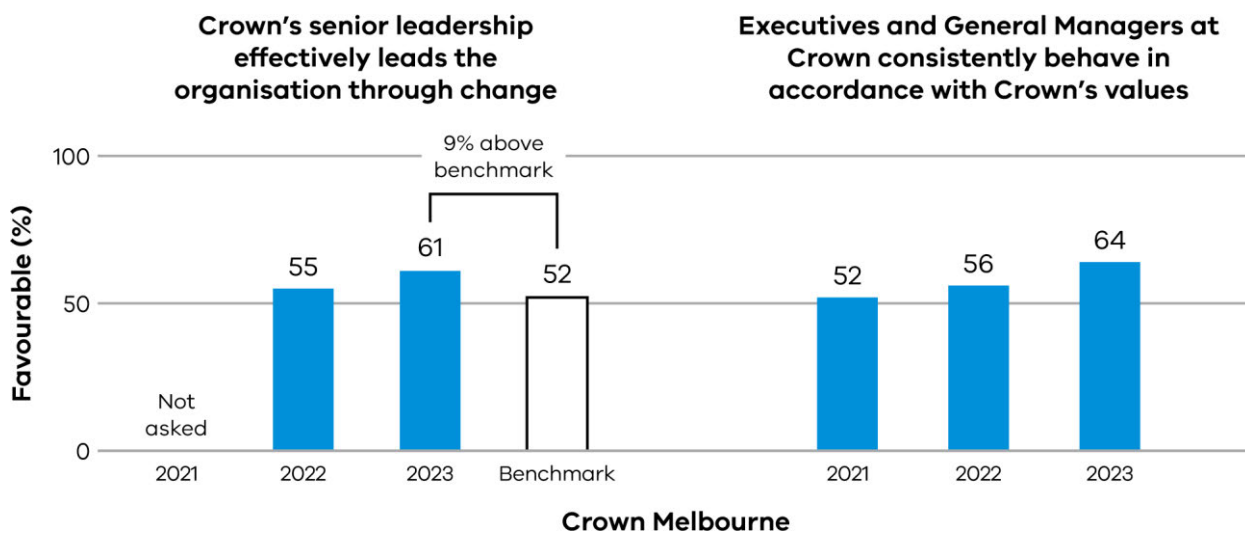
Overall, the OSM’s analysis of Crown’s employee survey data highlighted respondents’ increasing confidence in senior leadership. In particular:

- Employee perceptions of senior leadership role-modelling and change leadership have improved steadily from 2021 to 2023.

- Employee comments particularly emphasise the leadership role that Crown Resorts CEO Mr Ciarán Carruthers has played, with a number expressing that there have been noticeable changes at Crown following his appointment.<sup>5</sup>

Figure 2 shows that, for Crown Melbourne respondents overall, favourable responses (that is, those who ‘strongly agreed’ or ‘agreed’) to survey questions on senior leadership increased significantly between 2021 and 2023. Further, Mercer’s external benchmark data shows that Crown Melbourne respondents consider that their senior leaders are more effectively leading the organisation through change compared to the benchmark companies.

Figure 2. Responses to senior leadership-related questions from Crown Melbourne employees overall



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

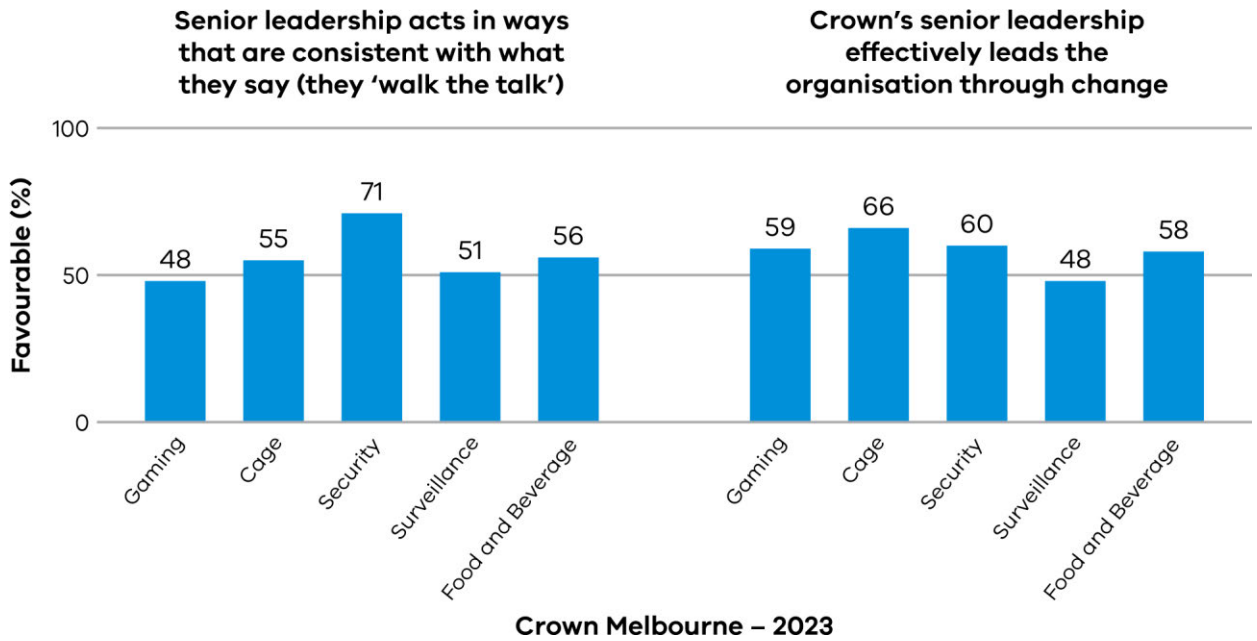
More than a third of respondents did not respond favourably to these questions, suggesting that further work is required in this area. In the free text comments provided by Crown Melbourne employees in 2023, there were 104 references to leadership displayed by Crown executives and Blackstone Inc., including 52 positive comments. Some comments provide insight into why some respondents may still have reservations about the leadership displayed by senior colleagues (see section 4.3).

The OSM's analysis also identified that respondents in different teams hold significantly different perceptions of senior leaders. For example, respondents from the Security team expressed far more positive views on senior leadership role-modelling compared to those in the Surveillance and Gaming teams. Figure 3 shows relevant survey questions where favourable responses varied significantly across teams in 2023.

<sup>5</sup> The OSM notes that Crown's 'Your Voice' survey was undertaken in October 2023, prior to media reporting of allegations in early December 2023 that the Crown Resorts CEO, Mr Ciarán Carruthers had inappropriately intervened to overturn exclusions issued by security personnel to customers for breaches of casino entrance requirements.



Figure 3. Responses to senior leadership-related questions from Crown Melbourne teams

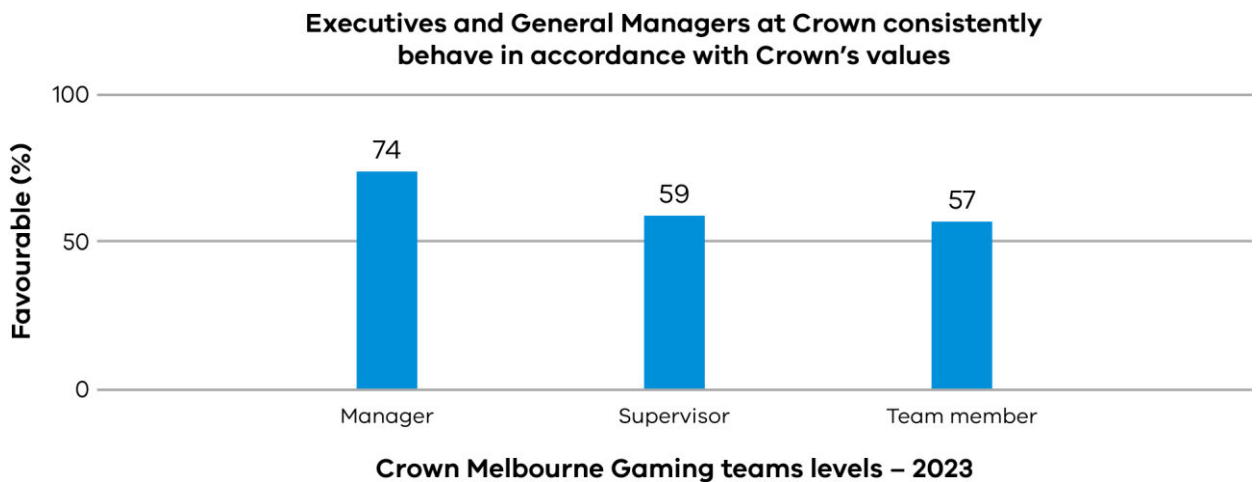


Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

The OSM's analysis found that managers in Gaming teams tended to express more positive perceptions of senior leadership role-modelling than their team members and supervisors. Figure 4 shows relevant questions where favourable responses varied significantly for Crown Melbourne Gaming employees at different levels in 2023. There may therefore be an opportunity for senior leaders to display more positive and visible role-modelling to employees below their direct reports.

Figure 4. Responses to senior leadership-related questions from Crown Melbourne Gaming teams



Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

### 3.3 Employees have a better understanding of Crown’s whistleblower program

*The speak up culture has certainly improved across Crown and people are being listened to about concerns that are raised, with actionable follow up completed.*

*I think the whistleblower initiative has been great, as this is not an easy issue to solve.*

*Whistleblower only works if it’s not obvious who made the complaint, if it is then you’re left one on one what [sic] that person, no one believes that there won’t be repercussions.*

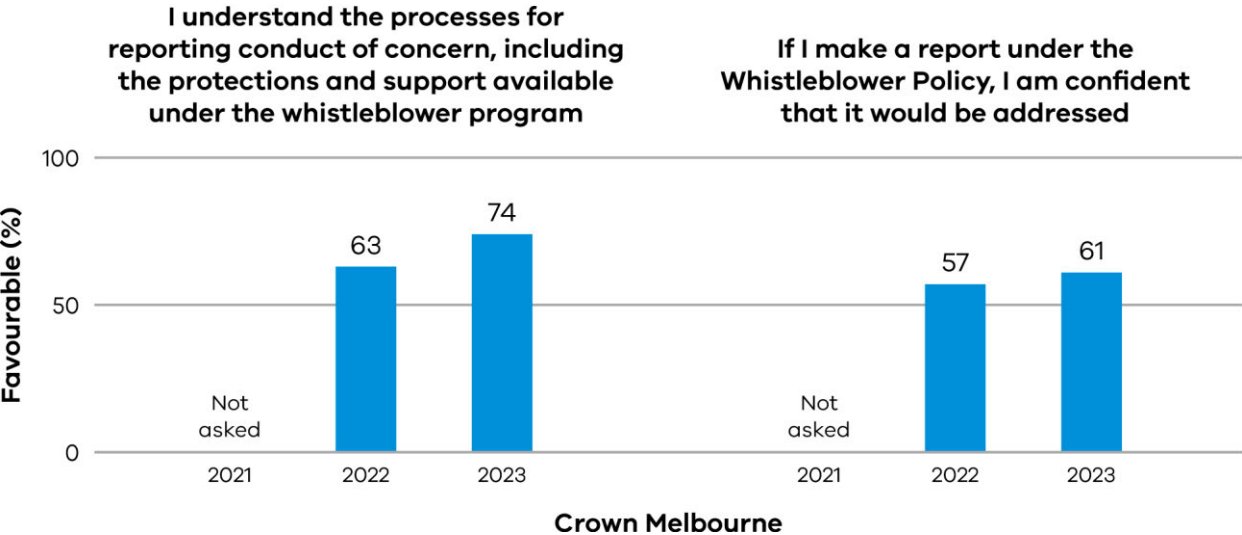
In 2022 and 2023, Crown’s employee surveys included two questions related to its whistleblower program, which aims to provide a safe channel for employees to speak up about concerns. The questions were designed to gauge whether employees:

- understand the processes for reporting conduct of concern, and the protections and support available under the whistleblower program
- are confident that any report made under the Whistleblower Policy would be addressed.

Overall, the OSM’s analysis of survey responses, including of free text comments, reveals improvement in employee perceptions of the program since 2022.

Figure 5 shows that Crown Melbourne employees’ favourable responses to survey questions related to its whistleblower program increased significantly between the 2022 and 2023 surveys.

*Figure 5. Responses to whistleblower-related questions from Crown Melbourne employees overall*

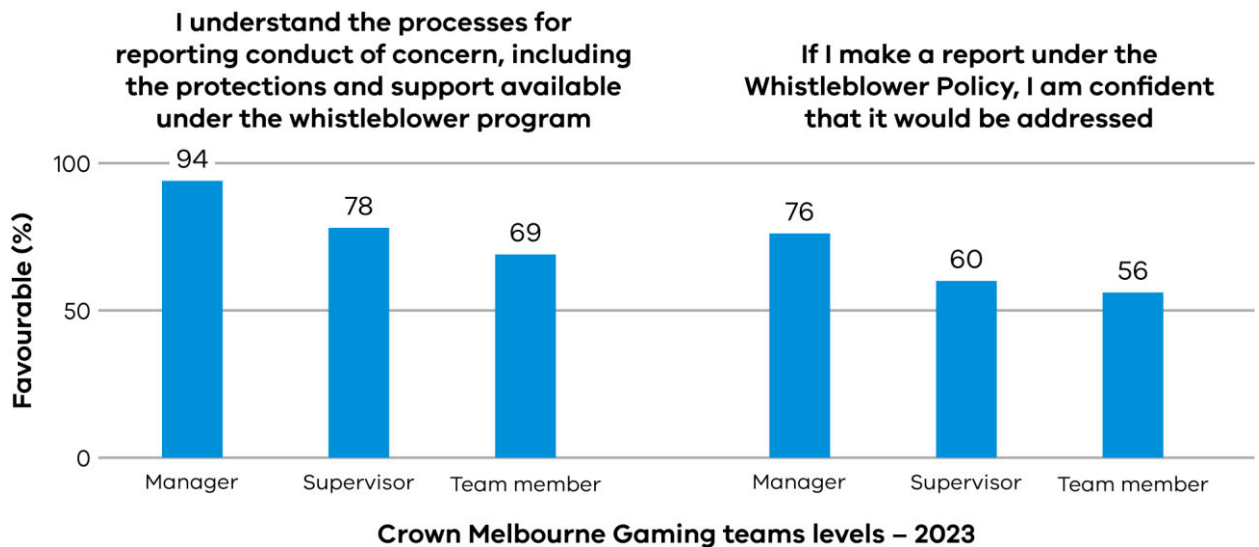


Source: OSM analysis of 2022 and 2023 employee survey results.

Responses confirm that there has been a significant shift in understanding of the whistleblower process. Respondents were more confident that any reports made under the whistleblower program would be addressed, although free text comments indicate that some perceived formal channels might not be a safe avenue for employees who wish to speak up.

Figure 6 highlights the differences in favourable responses to whistleblower-related questions in the 2023 employee survey for Crown Melbourne Gaming employees at various levels.

Figure 6. Responses to whistleblower-related questions from Crown Melbourne Gaming teams



Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

The OSM's analysis of survey responses suggests that understanding of the whistleblower program has improved across all teams and levels.

### 3.4 Performance management is gaining momentum

*[I've seen] a bit more catch ups with Direct Managers recently which is very good.*

*Dealer mentors ... give good feedback to our managers and us.*

*Positive behavior from management with coaching and mentoring on job.*

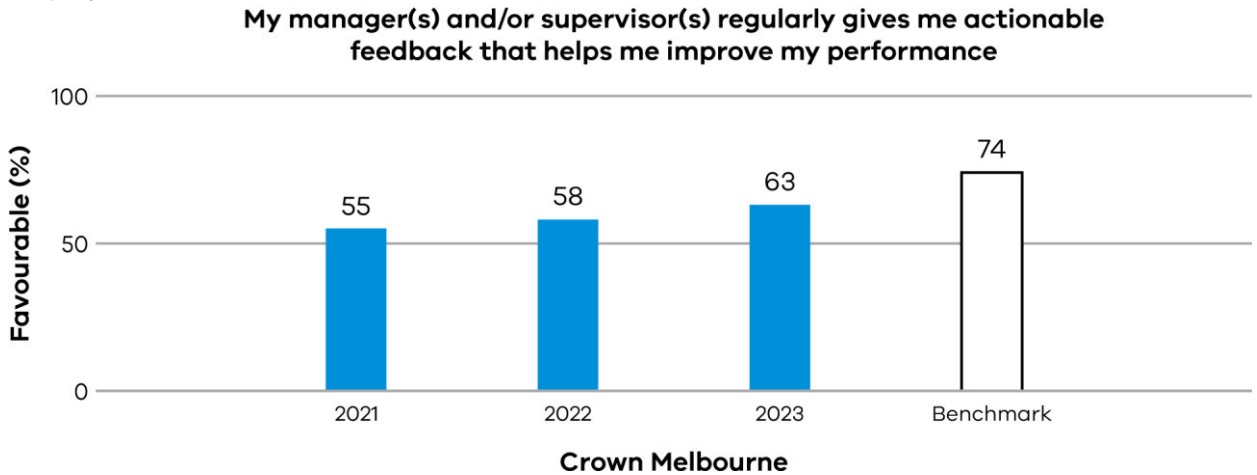
*I'm not sure if have [sic] performance appraisals in place.*

*Everybody seems to get the same percentage regardless the performance and it has sacrificed the pay rise percentage if we compare to last year.*

From 2021 to 2023, Crown's employee surveys have included one question about whether supervisors and managers regularly provide actionable feedback that helps to improve employee performance.

Overall, the OSM's analysis of Crown's employee survey data indicates that Crown Melbourne employees' favourable responses to the survey question on performance management increased significantly between 2021 and 2023 (see Figure 7).

Figure 7. Responses to the performance management-related question from Crown Melbourne employees overall



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

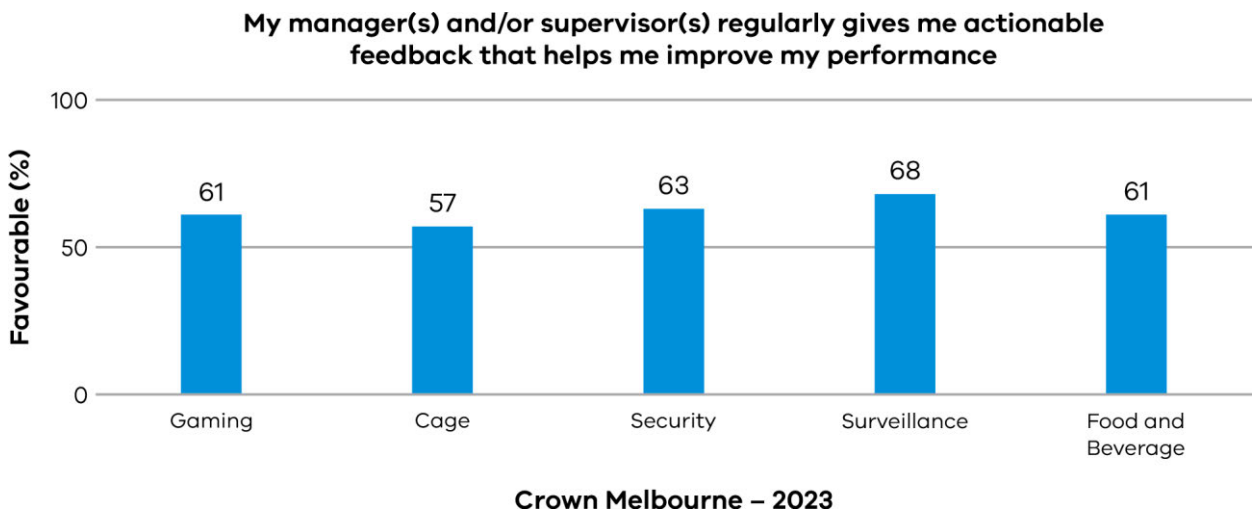
In particular:

- There has been steady improvement in employee perceptions of feedback from supervisors. There was a marked increase in positive responses in 2023 following the implementation of Crown’s new performance management system for salaried employees, which may have contributed to this observed improvement.
- Employee comments suggest mentoring and coaching practices have improved moderately. This may be related to the introduction of the ‘dealer-mentor’ role within the Table Games teams, which makes up the majority of the gaming team at Crown Melbourne.

Despite these advancements, Crown Melbourne survey results are significantly less favourable than the external benchmark. Further, a number of employees who provided free text comments raised negative sentiments about the level of recognition, feedback and coaching they receive from supervisors. These sentiments are considered relatively unsurprising in a survey of this nature.

The OSM observed moderate variation in responses to the performance-related question when analysed by team. For example, as Figure 8 shows, Surveillance team respondents are more positive about the quality of feedback from their managers than those in the Cage team.

Figure 8. Responses to the performance management-related question from Crown Melbourne teams



Note: ‘Gaming’ includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

### 3.5 Most employees continue to be aware of Crown’s commitment to RSG and understand the role they play

*Crown has really stepped up its commitment to encourage responsible gaming for its patrons ...*

*Responsible Gaming has had its teething problems but is becoming a real positive step for our guests.*

*Huge focus on Responsible gaming, AML and training. We have actually dedicated labour and money to ensure we do not make the same errors in the past.*

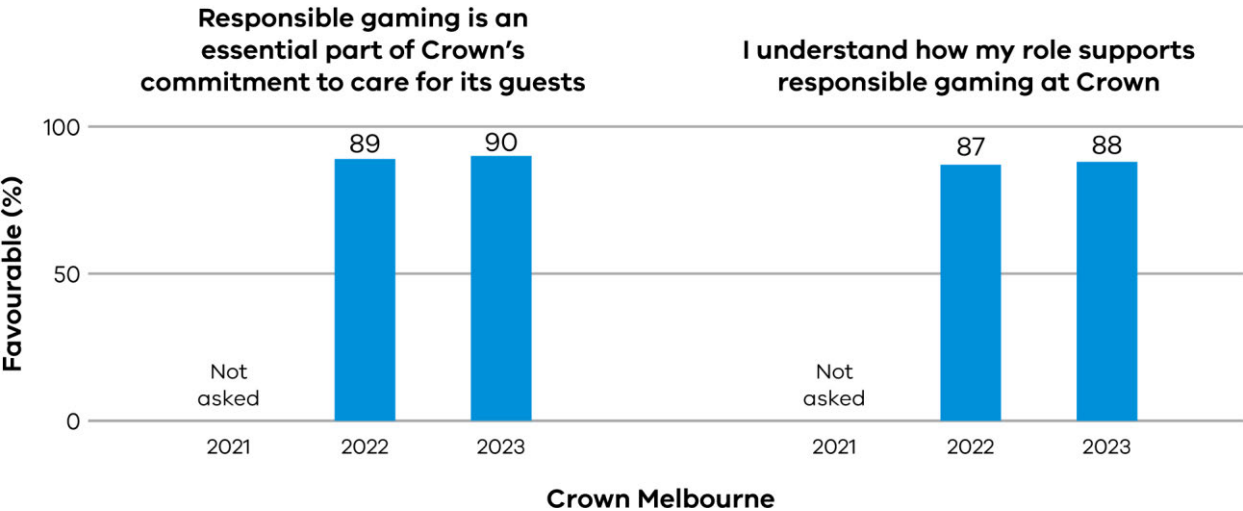
*The frequent changes to policy (RSG) create confusion & anger for our guests, which frontline staff have to cope with.*

In 2022 and 2023, Crown’s employee surveys included two RSG-related questions testing employee:

- awareness that RSG is an essential part of Crown’s commitment to care for its guests
- understanding of their role in supporting RSG at Crown.

Overall, the OSM’s analysis of Crown’s employee survey data identifies consistent and sustained employee awareness regarding Crown’s RSG obligations, and shows that Crown Melbourne employees’ favourable responses to these survey questions have increased slightly – see Figure 9. In 2023, Crown Melbourne respondents made 130 positive references to the RSG program in free text comments, and these indicate that employees perceive an improvement in Crown’s RSG program since 2022 and have welcomed these changes. The results indicate a sound degree of buy-in from employees to the overarching principles of RSG and sound recognition of its importance at Crown.

Figure 9. Responses to RSG-related questions from Crown Melbourne employees overall

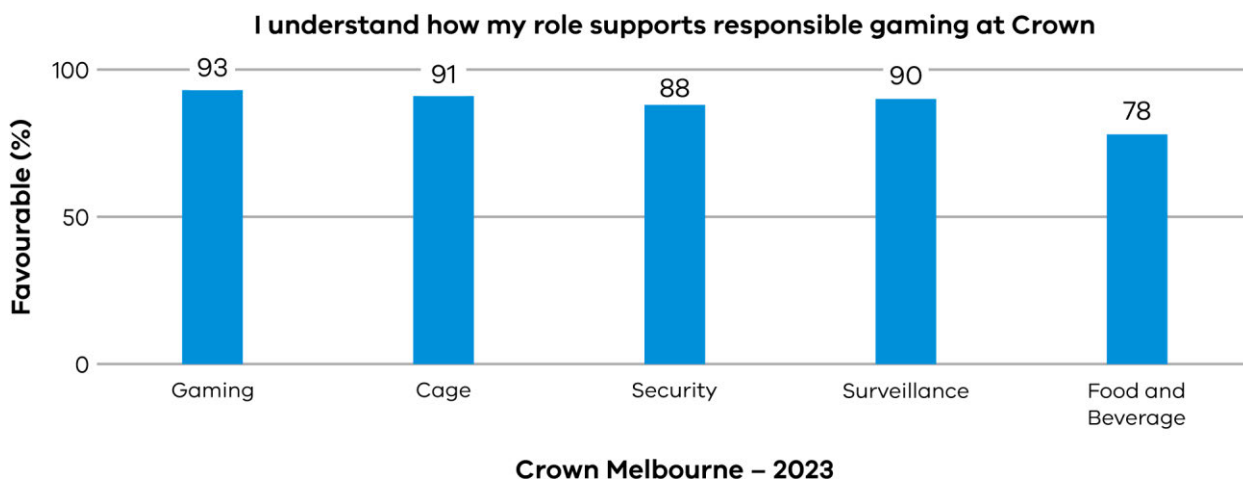


Source: OSM analysis of 2022 and 2023 employee survey results.

These findings should, of course, be interpreted in context. The survey responses suggest employees endorse and recognise Crown’s RSG endeavours, and that employees understand their roles and responsibilities, but do not provide insight into whether this is directly translating to actual new behaviours.

The OSM’s analysis identifies that most respondents recognise the importance of RSG, regardless of their level or team, but that some teams have a clearer view of their role in RSG than others. As shown in Figure 10, respondents in the Table Games and Gaming Machines teams have the highest level of understanding of their role in RSG, compared with the Food and Beverage team, which has the lowest.

Figure 10. Responses to RSG-related question from Crown Melbourne teams



Note: ‘Gaming’ includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

### 3.6 There is strong recognition that compliance is important

*Crown has always made decisions that would benefit all parties which include the business, all its employees and customers. However, it has become much more on compliance now. Everything we do has a major importance on the law especially in relation to responsible gaming.*

*There are more decisions based on what’s right for the business from a compliance perspective than from what’s best for the gaming guest – less people getting away with bending rules.*

*It’s great to see Crown taking the necessary steps to ensure that we are compliant with all of the new regulatory requirements and bringing the team along for the journey to ensure that we all work in a stable environment.*

*Bending the rules seems to be the normal even after management reiterates policy and procedures.*

From 2021 to 2023, Crown’s employee surveys included two questions related to compliance, asking whether employees recognised that:

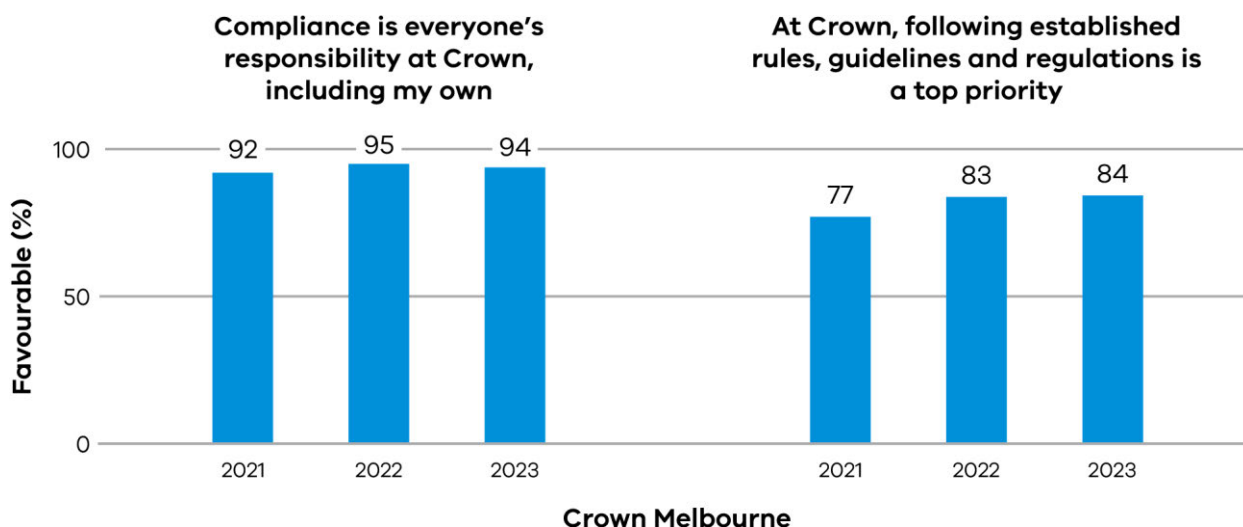
- compliance is everyone’s responsibility, including their own
- following established rules, guidelines and regulations is a top priority at Crown.

The OSM’s analysis of the employee survey data indicates ongoing awareness among respondents about the significance of rules at Crown. In particular, the data shows employees:

- have a high degree of personal responsibility for compliance
- perceive an increased emphasis on guidelines and regulations between 2021 and 2023.

Figure 11 provides more detail about how the proportion of Crown Melbourne employees giving favourable responses to compliance-related survey questions has increased or remained high in this period.

Figure 11. Responses to compliance-related questions from Crown Melbourne employees overall

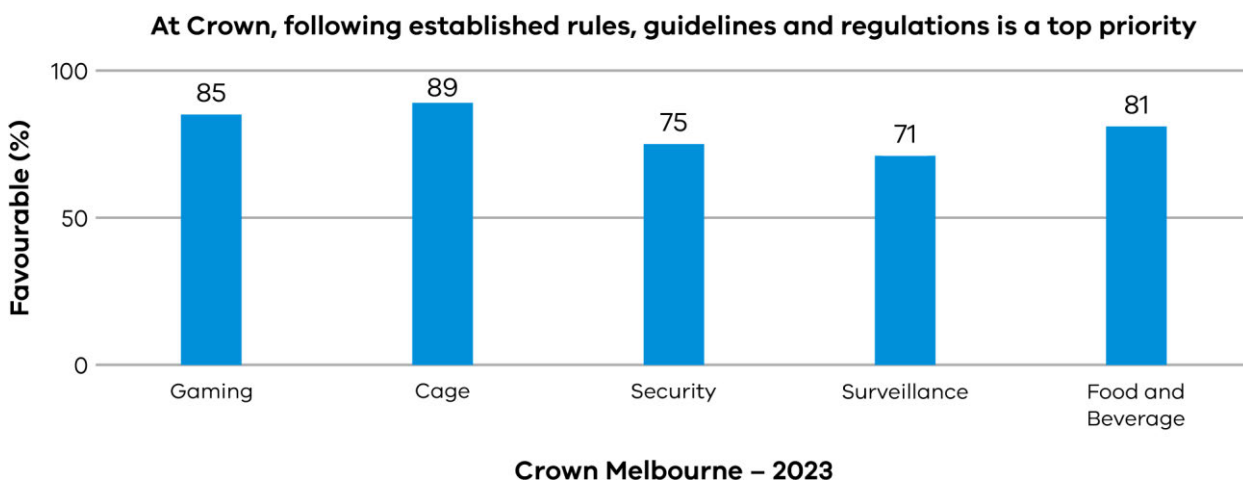


Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

The OSM's analysis identifies strong agreement, across all teams and levels, that compliance is everyone's responsibility. However, it is noted that respondents to surveys such as these can give answers they perceive to be socially desirable when asked about compliance.

Figure 11 also indicates that there has been a significant increase since 2021 in employees recognising that following rules, guidelines and regulations is a top priority at Crown, albeit perceptions of the priority placed on rules and regulations varies across teams. For example, Figure 12 shows that Security and Surveillance respondents provided less favourable responses in this area, which is a relatively common result among teams responsible for identifying and investigating non-compliance.

Figure 12. Responses to compliance-related question from Crown Melbourne teams



Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

## 4. Areas requiring ongoing improvement

### 4.1 Introduction

The OSM's analysis of Crown's employee survey data has identified the following areas where ongoing improvement is required due to the significant challenges that continue to exist, and the risks these challenges present to Crown's cultural reform (Table 3).

Table 3. Areas requiring ongoing improvement from employee survey data

Section reference	Area requiring ongoing improvement
4.2	There are some ongoing barriers to speaking up.
4.3	Employees perceive that some middle managers inconsistently role-model Crown values.
4.4	Some employees feel disempowered.
4.5	A level of psychosocial risk remains in some teams.
4.6	Some employees question the authenticity of change.

The following sections provide further detail on these areas for further improvement and include illustrative free text comments from respondents.

### 4.2 There are some ongoing barriers to speaking up

*I have noticed there has been more awareness made in terms of encouragement for reporting any inappropriate behaviour.*

*Staff abuses from patrons is still quite frequent in VIP Mahogany [sic] suite without much interventions from managers. Especially if they are big players. I would want to raise the issue but obviously under customer focus role, I was focused on more game security and integrity rather than pressing on the issue.*

*I don't believe we're all the way there yet when it comes to protecting people against adverse consequences from voicing concerns with management. To be clear, I'm not talking about anything that would legally constitute adverse action ... I mean more subtle consequences – being talked about less positively than other team members, being overlooked for roles of responsibility ...*

*[In our] monthly meeting and no-one participates because nothing is taken on board seriously nor actioned, so you just give up.*

From 2021 to 2023, Crown's employee surveys included three questions about speaking up (in addition to two specific questions on the whistleblower program), including whether employees:

- feel they can express views without the fear of negative consequences
- are confident they would not be penalised for raising concerns
- consider that the people they work with speak up and challenge each other if they think they are not doing the right thing.

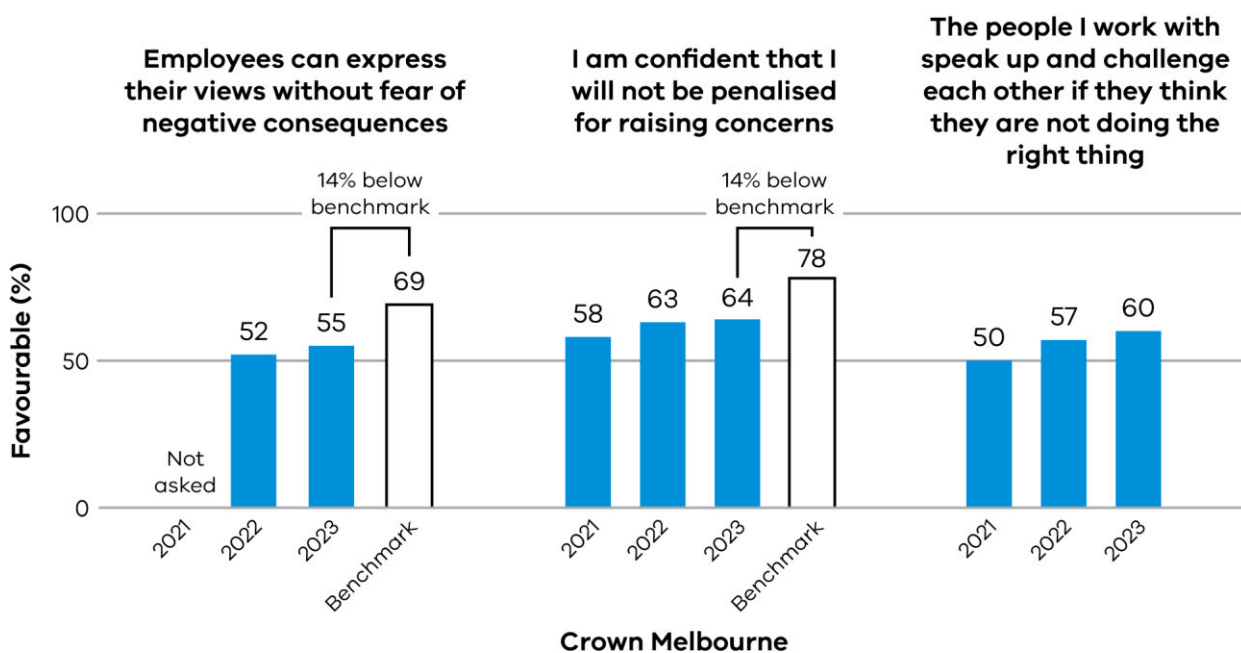


Overall, the OSM’s analysis of Crown’s employee survey data reveals that, while there has been an improvement in speak up culture, some respondents are still concerned about repercussions when speaking up. The proportion of Crown survey respondents expressing this view is significantly greater than for benchmark companies. Employee comments highlight a range of barriers to openly communicating concerns, which is consistent with the sentiments highlighted in OSM focus groups conducted during the June 2023 reporting period. The barriers to open communication relate to a number of factors, with comments suggesting that they may include perceptions that raising concerns at Crown is futile, that there will be subtle repercussions for speaking up such as social exclusion and that there is a lack of individual responsibility for raising concerns.

The survey results reflect the complexity surrounding speaking up. Alternative interventions to formal whistleblower processes and channels may be required to address the barriers that employees perceive.

Figure 13 shows that Crown Melbourne employees’ favourable responses to speaking up-related survey questions increased significantly between 2021 and 2022, and stabilised between 2022 and 2023. For the two questions that were benchmarked, however, employees’ responses remain significantly below the benchmark.

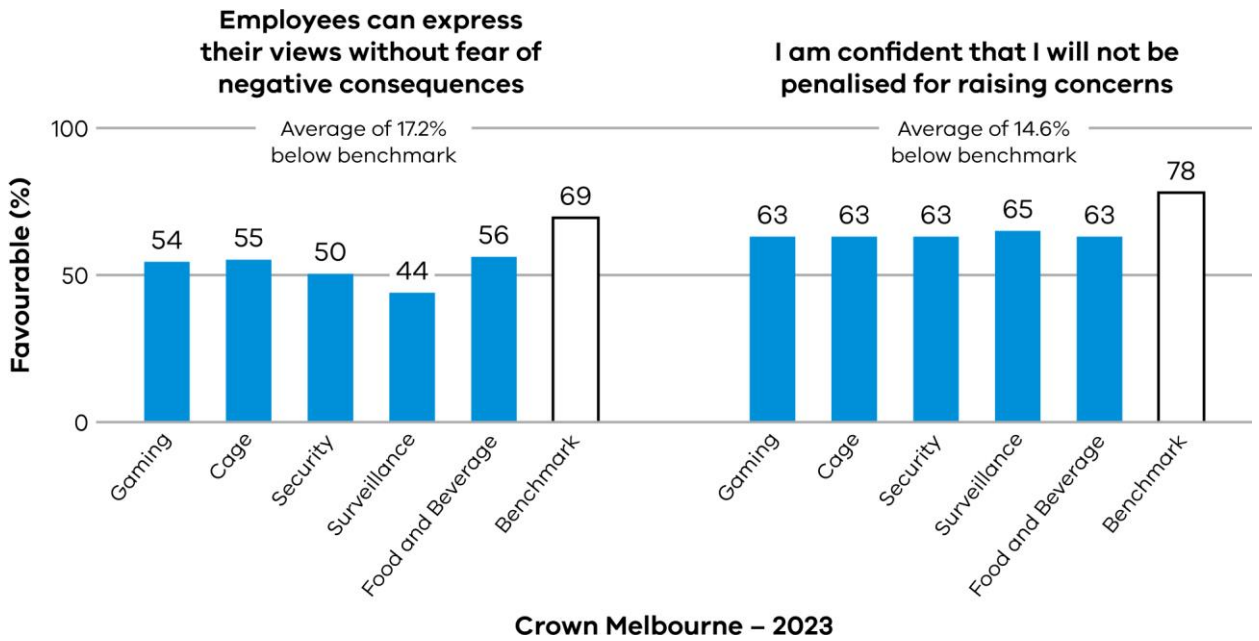
Figure 13. Responses to speaking up-related questions from Crown Melbourne employees overall



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

Figure 14 sets out the differences in favourable responses between Crown Melbourne teams to speaking up-related survey questions in 2023. It shows that for all teams, the favourable responses to speaking up-related questions were below the benchmark. A higher proportion of respondents from the Surveillance team indicated that employees fear negative consequences of speaking up.

Figure 14. Responses to speaking up-related questions from Crown Melbourne teams

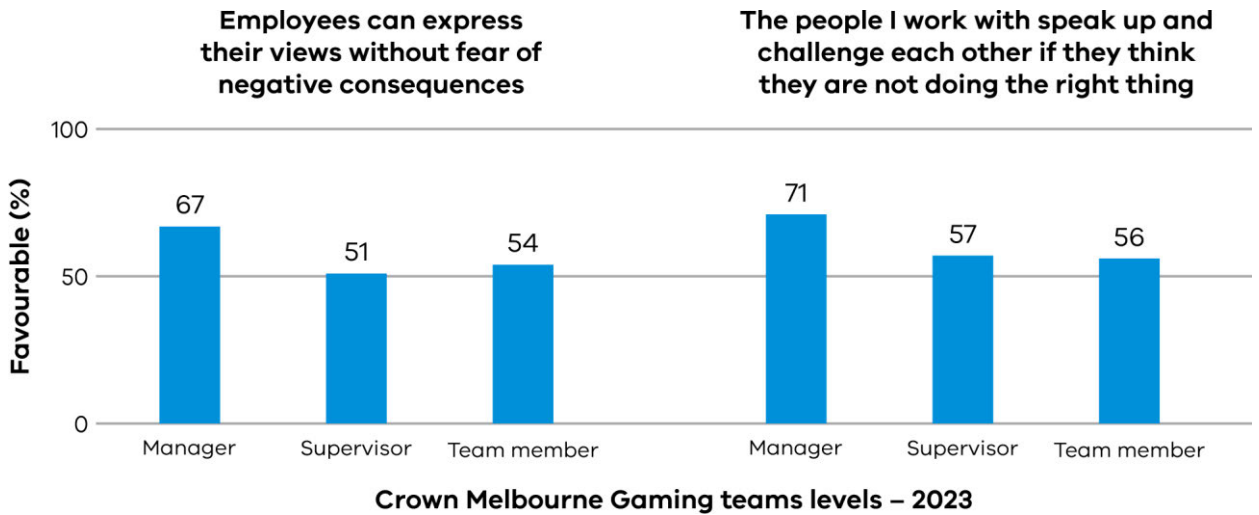


Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

Figure 15 suggests that across levels in Gaming teams, managers are less likely to believe their colleagues fear consequences for speaking up, and more likely to perceive instances of colleagues challenging each other.

Figure 15. Responses to speaking up-related questions from Crown Melbourne Gaming teams



Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

### 4.3 Employees perceive that some middle managers inconsistently role-model Crown values

*SOPs [standard operating procedures] and procedures – managers are not on the same page. ... One manager will tell you one thing the other another. Due to managers being 'old school' and not staying up to date since procedures change there's an influx in misinformation.*

*Some managers in my team, do not have a great understanding or know how to do the tasks their subordinator's [sic] do, due to a 'Not my issue or job, that is not my job attitude.'*

*I don't think the department heads genuinely connect with the beliefs and visions presented. Sadly, that group is still unexplored or not explored to the extent it could be.*

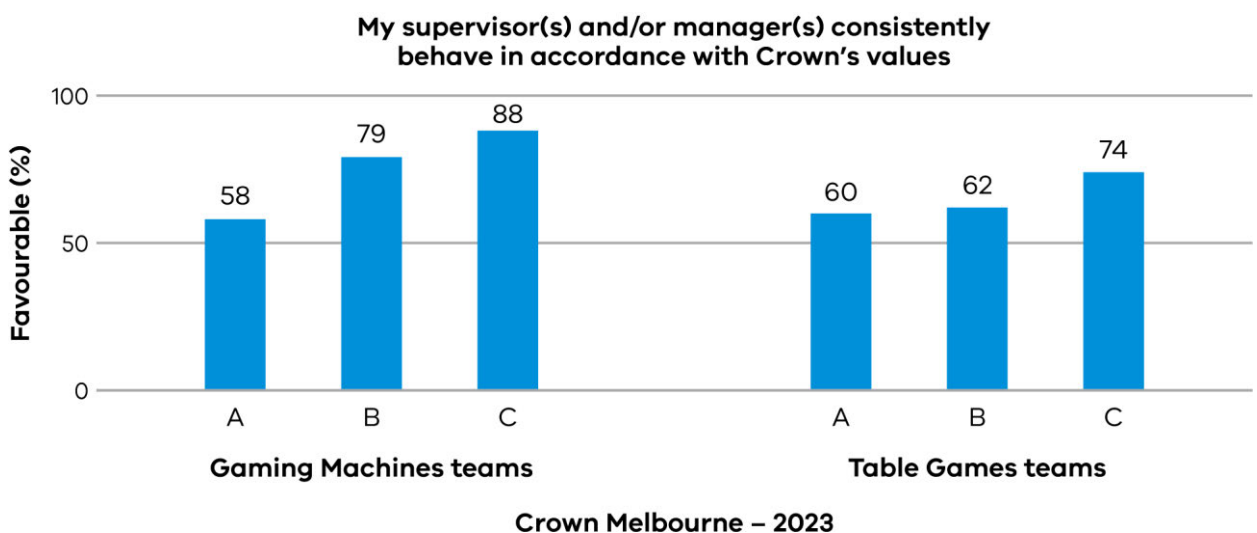
*I have noticed that ACMs [Assistant Casino Managers] are more involved in resolving bullying among staff. Giving more support and relay feedback and outcome of situations to those involved.*

*I find that there is very little support from ACMs across the floor, are they too top heavy. ... ACMs are rarely seen on the floor and should wear a uniform to identify them ... I personally don't feel supported at all by my seniors.*

In 2023, a new survey question was added to the 'Your Voice' survey to help Crown assess its progress in middle management role-modelling. This question asked whether managers or supervisors (both middle management) role-model Crown's values.

Overall, the OSM's analysis of Crown's employee survey data shows a marked variation in perceptions of middle management behaviours across teams. Across the property, the Crown Melbourne results show 73 per cent favourable responses in relation to supervisor/manager behaviours. However, more detailed analysis shows considerable variability in perceptions of different managers among the Gaming teams. Figure 16 shows Gaming teams' responses to the question about supervisor role-modelling.

Figure 16. Responses to the question about supervisor role-modelling from Crown Melbourne Gaming teams, by team



Source: OSM analysis of 2023 employee survey results.

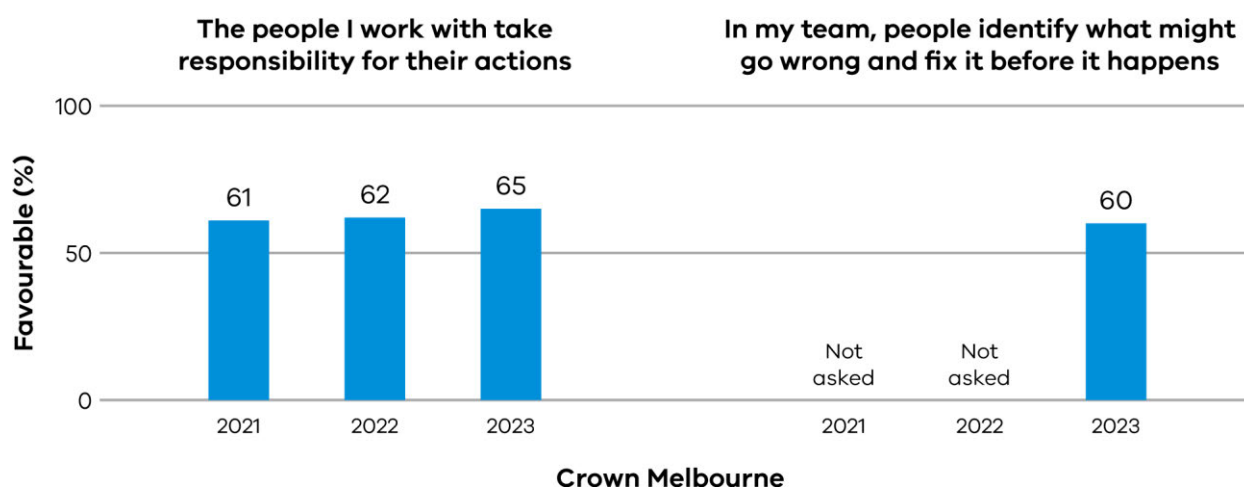
In addition, Crown’s employee surveys included two questions about accountability at lower levels of the organisation, namely whether employees perceived that:

- the people they work with take responsibility for their actions
- the people in their team identify what might go wrong and fix it before it happens.

While not explicitly related to middle management, analysis of these questions provides some insight into the effectiveness of middle management reinforcement of accountability within teams.

Both survey responses and comments suggest that Crown Melbourne employees perceive limited progress instilling a culture of accountability. The 4 per cent increase since 2021 in Crown employees’ favourable responses on the first accountability-related question, shown in Figure 17, is not statistically significant.

Figure 17. Responses to accountability-related questions from Crown Melbourne employees overall



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

The free text comments from Crown Melbourne respondents included 140 references to inconsistent role-modelling by middle management, including a number of comments suggesting there may be gaps in accountability at certain levels such as the Assistant Casino Manager cohort, which was mentioned specifically by respondents.

#### 4.4 Some employees feel disempowered

*The higher ups (the level 6 execs) are making changes that are impractical as of [sic] they’ve never been a dealer and can’t understand how or why it impacts us negatively.*

*It seems that decisions are being made for the short-term gain and the input or view of those that work the floor every day are never considered.*

*Crown employee are not empowered and valued anymore. Every little decision that we make are influenced from top. There is so much micro managing I have seen resulting in high staff turnover of staff.*

*The current organisational structure is too top heavy at the Executive level and doesn't permit leaders to be empowered to make decisions resulting in delays in decisions being made which eventually impact customer experience.*

*There is a lot more clarity in what is right and what is wrong and it allows for confident decision making which empowers us all.*

Crown's employee surveys included three questions related to empowerment, asking whether employees perceived that:

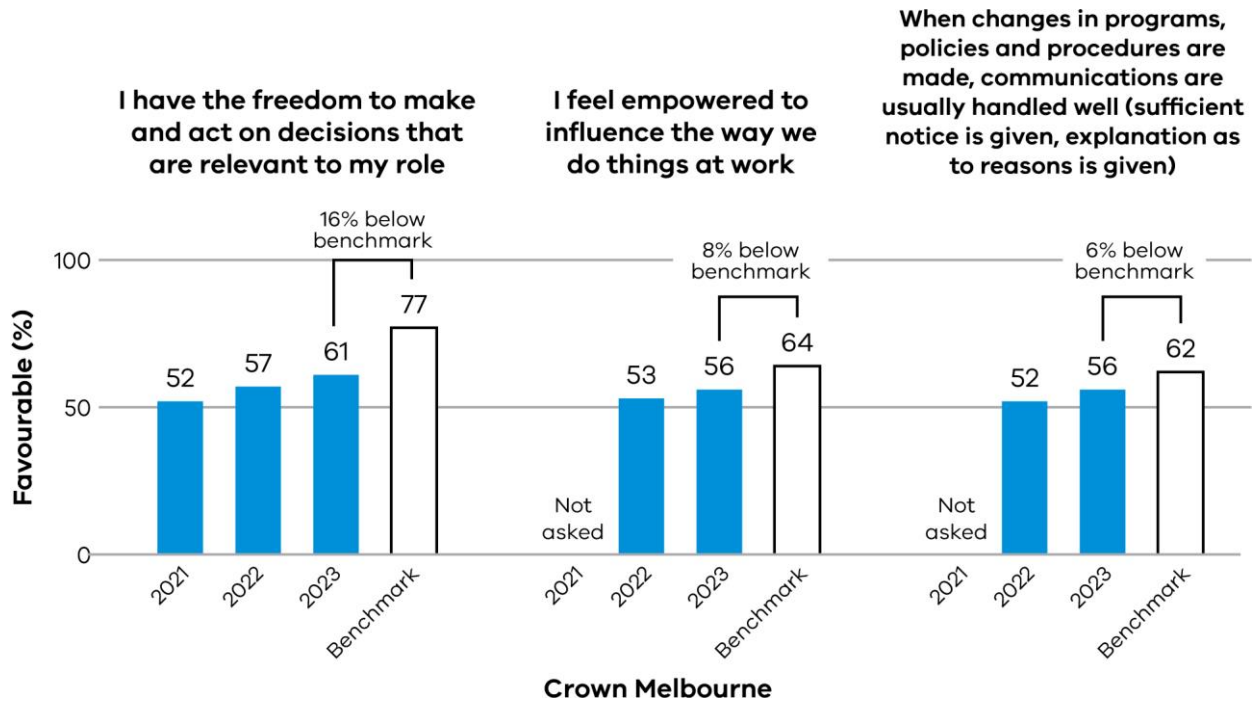
- they have the freedom to make and act on decisions relevant to their role
- they feel empowered to influence the way they do things at work
- communications about changes in programs, policies and procedures are usually handled well, including whether they receive sufficient notice of the changes and explanation of why the changes are being made.

Overall, the OSM's analysis of Crown's employee survey data shows that many respondents do not feel they are adequately involved in decisions about their roles, and that communication about changes to policies and procedures has been poorly managed. These perceptions may reflect the high volume of change occurring at Crown over the past two years. There were 168 references to disempowerment in free text comments by Crown Melbourne employees, with some of these comments suggesting that more input from frontline employees is needed to make required changes more practical to implement.

As Crown's change management function continues to mature, the negative impacts of change on employee sentiment may reduce. However, the results underscore the importance of Crown continuing to refine communication strategies and fostering greater involvement of employees in decision-making processes to effectively address employee concerns about changes.

Figure 18 shows the overall Crown Melbourne results for empowerment-related questions. The favourable responses increased slightly each year between 2021 and 2023, but remain below those for benchmark companies. This may be expected in a highly regulated industry, where frontline roles are rule-bound with significant compliance requirements.

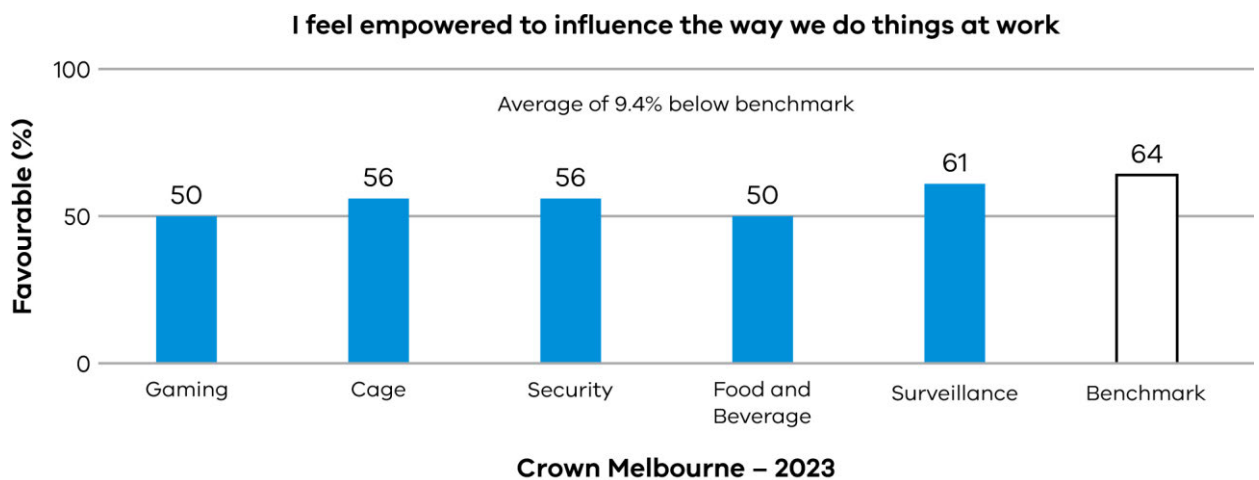
Figure 18. Responses to empowerment-related questions from Crown Melbourne employees overall



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

Figure 19 shows the differences in results for Crown Melbourne teams on empowerment-related questions in the 2023 employee survey. Across teams, results are below those for benchmark companies.

Figure 19. Responses to empowerment-related questions from Crown Melbourne teams

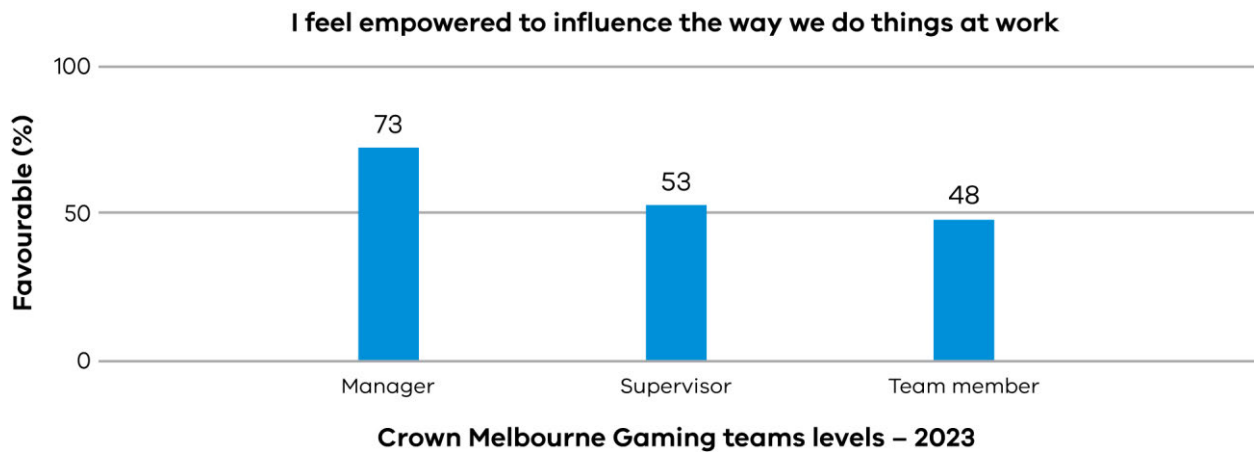


Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

Analysis of results across management levels shows a typical pattern, with Figure 20 showing respondents' perceived empowerment increasing the higher their position in the organisation.

Figure 20. Responses to empowerment-related questions from Gaming teams



Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

## 4.5 A level of psychosocial risk remains in some teams

*Crown's culture has changed dramatically in the past 12 months and not for the better. Morale of all staff is extremely low and everyone is very demotivated ... I go home each day stressed and unable to sleep. This is why I am leaving the business.*

*Favouritism is too common in Crown despite the spiel about integrity.*

*From the feedback given to me across the floor, the morale of staff is extremely very low, staff have discussed with me that there are too many changes happening all at once, which is creating anxiety for them.*

*There is a lot of downward pressure. Sadly I don't always feel seen or heard & there are often times I feel like I'm just a number. You're told to be your true authentic self when coming to work, however it's very hypocritical as you will get judged.*

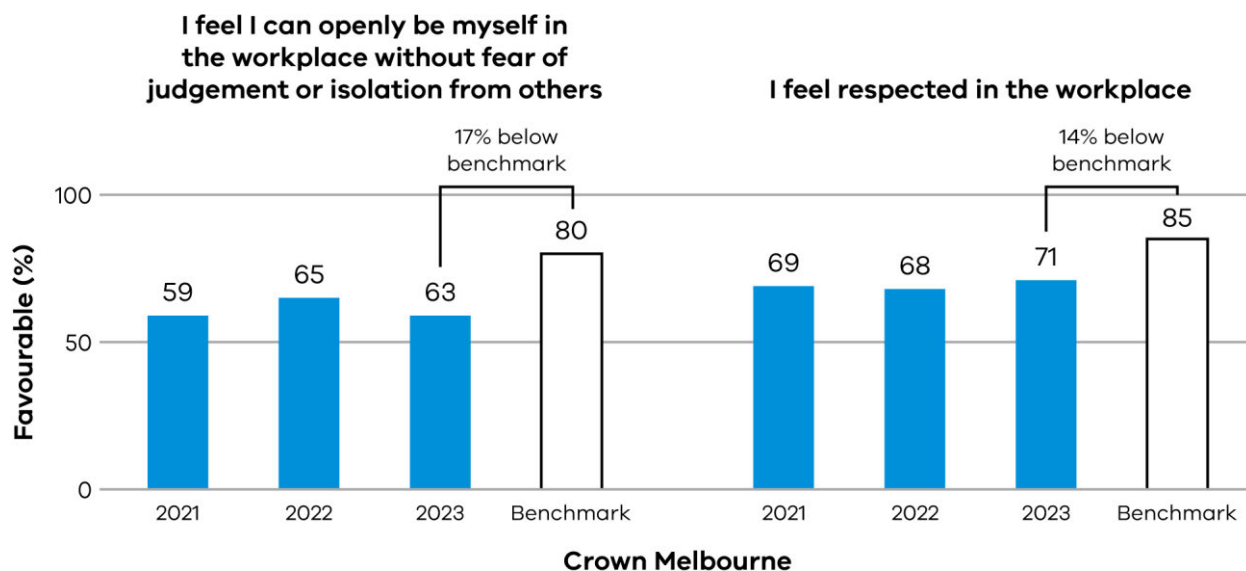
*I like how they're pushing to be more progressive and more inclusive. I feel safe in my workplace.*

Psychosocial risks are factors in the workplace that may negatively impact the psychological and physical wellbeing of workers. They arise from the way work is designed, organised and managed, or from the economic and social contexts of work. Crown's employee surveys included a number of questions relevant to psychosocial risk, including questions on whether employees perceived that:

- they can openly be themselves in the workplace without fearing judgement or isolation from others
- they feel respected in the workplace
- their supervisor/manager cares about their wellbeing
- they can cope effectively with stress at work
- they have pride in working for Crown.

Overall, the OSM’s analysis of Crown’s employee survey data suggests that psychosocial risk is an ongoing challenge for Crown Melbourne, at least in some teams. As shown in Figure 21, a higher proportion of respondents worry about judgement or isolation from their colleagues compared to those at benchmark companies, and a lower proportion of respondents agreed they feel respected at Crown compared to the benchmark.

Figure 21. Responses to psychosocial risk-related questions from Crown Melbourne employees overall



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

It is worth noting that, while psychosocial risk is sometimes associated with employee engagement, they are different concepts. The results for questions related to overall employee engagement are relatively favourable compared to some other questions in the survey; however, on the specific issue of psychosocial risk, some pronounced concerns were raised by respondents, especially in free text comments.

In the 2023 survey, 326 references to psychosocial risk were made in free text comments by Crown Melbourne respondents. Respondents mentioned various drivers of psychosocial risk, including those:

- within teams, such as negative team dynamics, perceived favouritism, stress and anxiety
- across the organisation, such as job insecurity and uncertainty resulting from Crown’s transformation context and business performance.

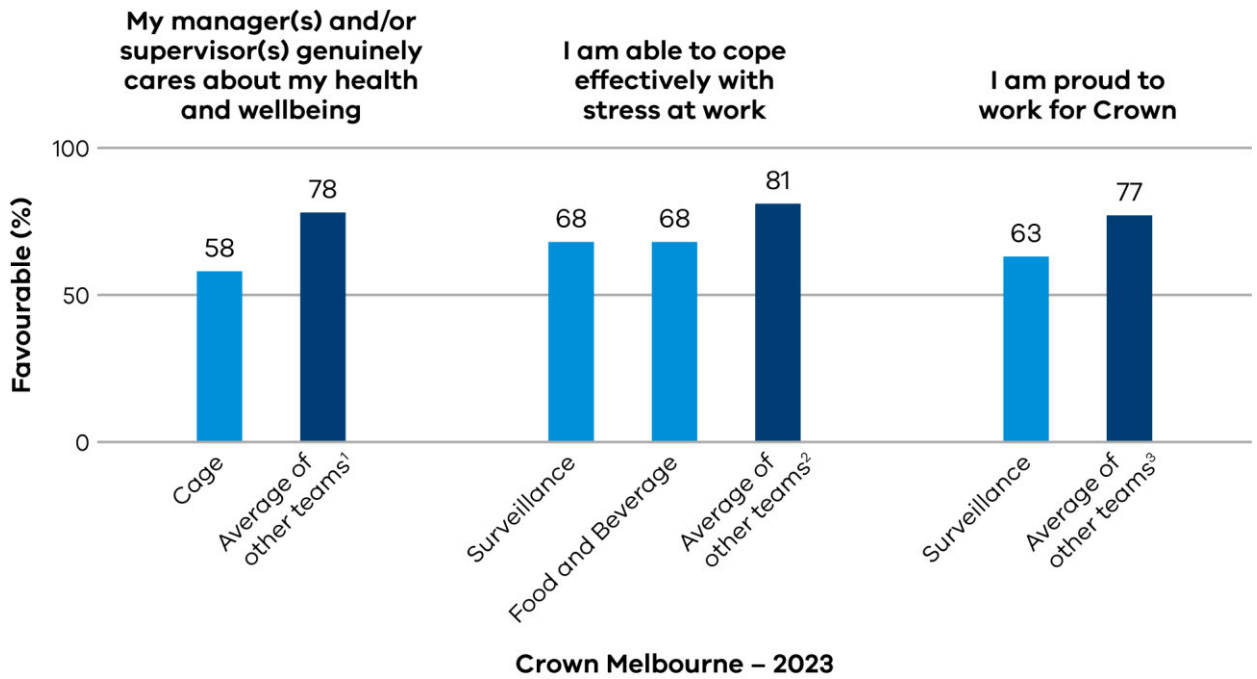
There were some specific differences in responses across teams in relation to psychosocial risks, especially those that may be related to pressure from change. Fewer respondents in the Cage team agreed their supervisor/manager genuinely cares about their wellbeing compared to other teams. Respondents in the Surveillance and Food and Beverage teams expressed more stress than their colleagues in other teams. Respondents in the Surveillance team expressed less pride in working for Crown.

There are relatively small differences between respondents of different levels on questions related to this theme, although Gaming supervisors were less positive about perceived respect in the workplace than team members and managers. This pattern is not unusual for supervisors, who can feel ‘sandwiched’ between frontline employees and management.

Figure 22 shows the results for some Crown Melbourne teams on several questions related to psychosocial risk where there were significant differences in favourable responses.



Figure 22. Responses to psychosocial risk-related questions from Crown Melbourne teams



1. Gaming (71%), Security (88%), Surveillance (83%) and Food and Beverage (69%).

2. Gaming (75%), Cage (79%) and Security (88%).

3. Gaming (69%), Cage (77%), Security (88%) and Food and Beverage (73%).

'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

## 4.6 Some employees question the authenticity of change

*I think Crown is working on creating the impression that it truly cares about the wellbeing of customers, but its first priority is its profits.*

*There are certain decisions and actions from upper management that prioritise the health of the company over the health of its workers and is contradicting to their overall message as a company.*

*More concerned about image than actually making change. Bring in strong RSG rules but leave giant loop-holes.*

*Senior/Executive leaders act differently behind closed doors than when in public. Publicly, it's about doing the right thing, speaking up, and being a positive community member, while behind closed doors it's an authoritarian atmosphere focused on chasing business performance and revenue.*

*The cultural changes written up and posted but they are words on a page. I see and hear it from people and then see those same people acting exactly the same as prior to the new ideals.*

Crown's employee surveys included two questions that provide insight on whether employees perceive Crown's change efforts as authentic, asking whether:

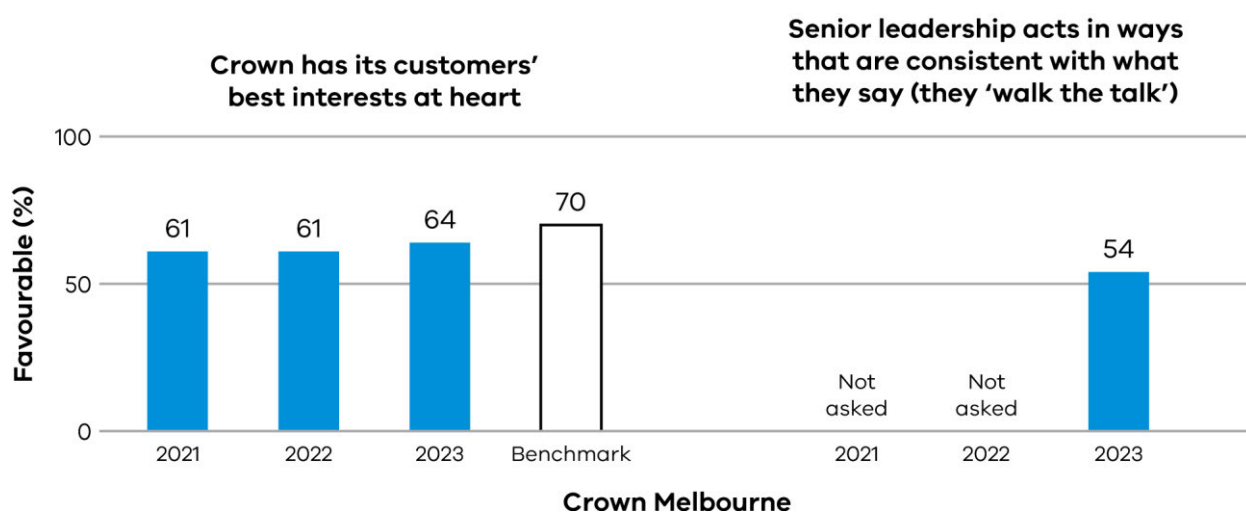
- Crown has its customers' best interests at heart
- senior leadership acts in ways that are consistent with what they say (they 'walk the talk').

There were also 182 references to changes being perceived as inauthentic in free text comments by Crown Melbourne employees.

While noting that Crown’s 2023 survey results indicate employees have greater confidence in Crown’s senior leaders (see section 3.2), the OSM’s analysis of Crown’s employee survey data indicates that some respondents perceive certain behaviours and decisions by senior leaders may be inconsistent with public messages about Crown’s values and transformation goals. Although it is reasonable to expect some level of scepticism during the initial phases of change, if employee doubts persist surrounding the authenticity of the transformation they may impede the sustained momentum necessary for Crown’s reform.

Figure 23 shows Crown Melbourne results for questions related to authenticity of change. It shows little change over the past three years in employee perceptions of whether Crown has its customers’ best interests at heart, and that fewer than 60 per cent of respondents have a favourable perception of senior leaders ‘walking the talk’.

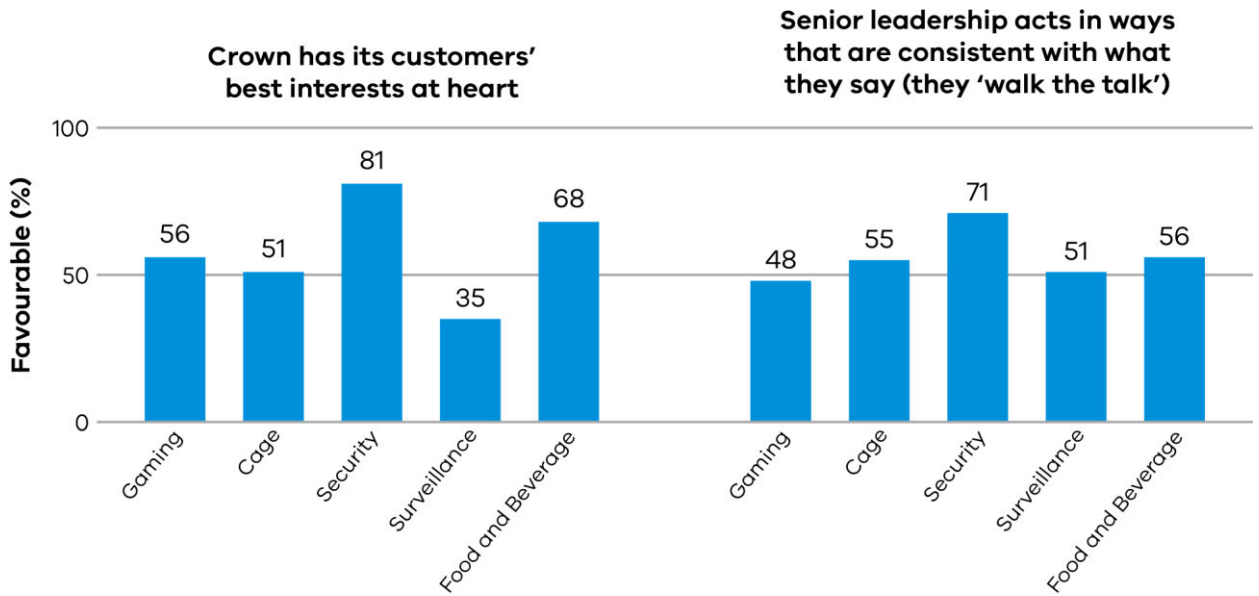
Figure 23. Responses to authenticity of change-related questions from Crown Melbourne employees overall



Source: OSM analysis of 2021, 2022 and 2023 employee survey results.

Figure 24 reveals considerable differences between teams in employee perceptions of the authenticity of Crown’s leaders towards customers and employees. Only 35 per cent of Surveillance respondents agreed that Crown has its customers’ best interests at heart, compared to 81 per cent of respondents in Security. Fewer than half of the respondents in Gaming agreed that senior leaders ‘walk the talk’, whereas 71 per cent of respondents in Security agreed with this statement.

Figure 24. Responses to authenticity of change-related questions from Crown Melbourne teams



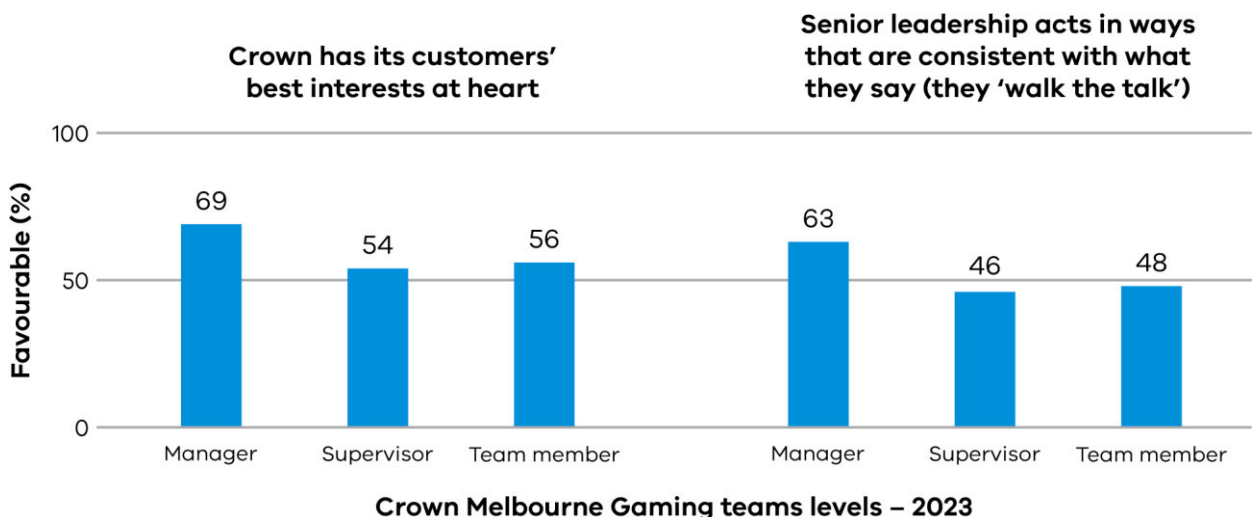
**Crown Melbourne – 2023**

Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

Analysis of survey results by level shows that respondents at a team member level exhibit more pronounced cynicism about Crown having its customers' best interests at heart and about senior leaders' role-modelling. At more senior levels, this perception appears to dissipate, which may suggest a communication or engagement gap. Figure 25 shows the differences in favourable responses between Crown Melbourne Gaming employees at different levels to authenticity of change-related questions in the 2023 employee survey.

Figure 25. Responses to authenticity of change-related questions from Crown Melbourne Gaming teams



**Crown Melbourne Gaming teams levels – 2023**

Note: 'Gaming' includes Table Games and Gaming Machines combined.

Source: OSM analysis of 2023 employee survey results.

# Annexure: OSM's analysis methodology

This annexure provides further detail regarding Crown's survey data and the OSM's methodology in analysing Crown's employee survey results.

## About the Crown surveys

Crown has undertaken employee surveys over three consecutive years since the Finkelstein Royal Commission: the 2021 'Culture at Crown' survey, the 2022 'Your Voice' survey and the 2023 'Your Voice' survey.

### 2021 'Culture at Crown' survey

In May 2021, Crown engaged Deloitte to conduct the 'Culture at Crown' survey.

The survey consisted of 59 fixed choice questions drawn from Deloitte's existing survey banks and Crown's engagement survey question sets. For nine of the questions, depending on the response, participants were presented with a follow-up question seeking additional information in the form of qualitative responses. Two open-ended questions relating to what aspects of Crown's culture hinder or enable its success, and nine demographic questions were included at the end of the survey.

Participants responded to questions using a five-point Likert scale (ranging from 'strongly agree' to 'strongly disagree').

Crown achieved a completion rate of 57 per cent of employees across all properties.<sup>6</sup>

### 2022 'Your Voice' survey

In November to December 2022, Crown engaged Mercer to conduct the first 'Your Voice' survey.

This survey included 66 questions on topics similar to the 2021 'Culture at Crown' survey and used Mercer's question bank. Additional questions were added on risk culture, RSG, employee brand, motivation and engagement. Similar to the 2021 survey, the 2022 survey concluded with two open-ended questions relating to what aspects of Crown's culture hinder or enable its success, as well as nine demographic questions.

As in 2021, participants responded to questions using a five-point Likert scale.

The survey achieved a 52 per cent completion rate across all Crown properties, including 50 per cent in Crown Melbourne.<sup>7</sup>

### 2023 'Your Voice' survey

In October 2023, Crown again engaged Mercer to conduct another 'Your Voice' survey. The 2023 survey was administered electronically by Mercer from 5–29 October 2023. This survey occurred following the launch of Crown Resorts Corporate Strategy in September 2023 and sought to avoid peak trading periods. A Crown Melbourne employee town hall briefing conducted on 12 October 2023 was used to encourage participation and to remind employees of the actions Crown took in response to the findings of the previous year's survey.

Crown consulted with both the OSM and Kroll (the independent monitor overseeing Crown Sydney's reform) on the proposed question set and considered a range of factors when finalising the survey. In particular, it wanted to be able to:

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<sup>6</sup> Mercer, Crown 'Your Voice' Survey 2023 – Crown Melbourne Results Presentation, November 2023, p. 3.

<sup>7</sup> Mercer, *Crown Culture Survey and Analysis Report*, 25 May 2023, p. 50.

- measure change between 2021 and 2023
- benchmark Crown against external benchmarks
- assess the impact of recent initiatives
- gather data on key aspects of its people strategy, including employee engagement.

The survey comprised 33 questions, 17 of which were repeated across the 2021 and 2022 employee surveys. In addition to the fixed choice questions, one free text question was included at the end, asking respondents to '[p]lease share any observations you have about changes in Crown's culture over the last 12 months'.

As in previous surveys, employees responded to questions using a five-point Likert scale.

To address concerns raised in prior years that language difficulties may have precluded some employees from participating, employees were able to complete the survey in one of six languages (English, Chinese Traditional, Chinese Simplified, Vietnamese, Hindi and Korean).

In addition to engaging an external partner to conduct the survey, Crown used a range of strategies to reassure employees that participation was anonymous to encourage candid responses. For example, it:

- explicitly reassured employees about the anonymity of survey participation in communications about the survey launch and in reminders
- restricted analyses by demographic groups to groups of more than ten.

This year, employees were required to enter their employee ID number to enable more detailed analysis by business unit and level. There was some concern that this would impact response rates, but this does not seem to have materialised.

The survey achieved a 58 per cent completion rate across all Crown properties, including 55 per cent in Crown Melbourne.<sup>8</sup>

## Survey analysis methodology

The OSM independently reviewed and analysed Melbourne-specific data from the 2023 employee survey, as well as the 2021 and 2022 surveys. The OSM's analysis included comparisons of:

- Crown Melbourne results for individual questions across years
- Crown Melbourne results for individual questions versus the Mercer benchmark for those questions
- results for individual questions across key teams in Crown Melbourne including:
  - Gaming (Table Games and Gaming combined, because both teams were managed by the same leader at the time the survey was conducted), Security, Surveillance, and Cage, which are directly involved in casino operations
  - Food and Beverage, which Crown identified as warranting further examination based on the 2022 survey results
- results for individual questions across management levels in Crown Melbourne (where minimal sample sizes permitted) including Team Members, Team Leaders/Supervisors, Managers and Senior Managers/General Managers.

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<sup>8</sup> Mercer, Crown 'Your Voice' Survey 2023 – Crown Melbourne Results Presentation, November 2023, pp. 3, 6.

The OSM also undertook a systematic thematic and sentiment analysis of free text responses provided by Crown Melbourne respondents in the 2023 survey. The OSM coded comments using a standard content analysis method involving manual review and categorisation of comments according to topics and sentiment expressed. Where individual comments referenced multiple topics and/or sentiment, all relevant codes were applied to reflect the complexity of responses.

Themes were developed based on the synthesis of all relevant data, with particular consideration given to:

- changes in favourable responses to survey questions repeated across at least two time periods, especially where the difference is statistically significant
- common topics, sentiment and experiences shared in response to the free text question in the 2023 survey
- areas where change is especially critical due to the severity of concerns raised in the Finkelstein Royal Commission and/or because there is a need for early change to create momentum for sustained improvement.

When highlighting issues as relative improvements or weaknesses, the OSM considered a range of contextual factors, including:

- the stage of Crown's Culture Reform Program initiatives relative to the survey administration – for example, completion of the first performance management cycle
- Mercer's benchmark data (where available), which helps in interpreting results when there are differences between questions – for example, some questions are typically answered less favourably than other questions, regardless of organisation, context or time period
- insights from the Financial Services Culture Board, which between 2015 and 2023 published data showing how UK banks performed in relation to risk culture factors such as psychological safety and tone from the top.<sup>9</sup> Given the high level of regulatory scrutiny on the culture of UK banks in this period, during which several banks underwent enforcement orders, this data offers insight into where Crown may be able to improve its performance in similar areas.

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<sup>9</sup> Financial Services Culture Board, The FSCB Employee Survey 2016–2022, 8 June 2023, <https://financialservicescultureboard.org.uk/the-fscb-employee-survey-2016-2022>.

