



Crown London Aspinalls

Anti-Bribery and Corruption Policy
and Procedure V6.0

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1. Introduction

The Company's Policy - Zero Tolerance

Crown London Aspinalls (Crown London) is committed to operating its business interests not only with the highest level of corporate integrity and social responsibility but also, to prevent bribery and corruption in all its forms wherever and with whomever it conducts business. Crown London's policy aligns itself with the wider commitment of Crown Resorts Limited, in fostering a culture of robust governance in all jurisdictions in which it operates and transacts.

Every employee and representative acting on Crown London's behalf is responsible for maintaining the Company's reputation and for conducting business honestly and professionally.

The Bribery Act 2010 (Bribery Act) creates offences of offering, promising or giving of a bribe, the receiving of a bribe, a specific offence of bribery of a foreign public official and, importantly, the corporate liability offence of failure to prevent bribery. The scope of the Bribery Act is extra-territorial and therefore applies to all areas of corporate operation and associated third party activity.

The penalties for failing to comply with the Bribery Act are severe if a company is guilty of bribery or failing to prevent bribery, it could face an unlimited fine and immeasurable damage to its reputation.

A bribe is a financial advantage or another reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of Crown London are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, Crown London is committed to engaging only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

The Company will not conduct business with anyone that does not support Crown London's appropriate anti bribery and corruption objectives.

Crown London is committed to ensuring it achieves its statutory and regulatory responsibility for preventing corruption through acts of bribery. The Company places the highest priority on these responsibilities, and operates a zero-tolerance against bribery and corruption.

Michael Branson
Managing Director
Crown London Aspinalls

2. The Scope of this Policy

The purpose of this policy is to:

- Introduce the Bribery Act 2010;
- Set out Crown London's responsibilities and those of its officers, employees, subsidiaries, contractors and agents in complying with this policy and the Bribery Act; and
- To provide information and guidance on how to recognise and deal with bribery and corruption issues.

This Policy should be read in conjunction with the Crown Resorts Limited Anti-bribery and Corruption Policy.

3. Who is covered by the Policy?

This Policy applies to all individuals working at all levels and grades, including directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), agents, consultants, contractors, and any suppliers or other person associated with Crown London together with its subsidiary companies, joint venture partners, wherever they are located in the world.

If you are in any doubt about whether you or anyone else is covered by this policy, you should seek advice from Crown London's Senior Management or Compliance Department.

4. Bribery and Corruption Defined

4.1 Definition

Bribery can be defined as an offer or acceptance of an advantage, as an inducement for an action which is illegal, unethical or considered a breach of trust and can take many forms, including:

- The promise, offer or authorisation of anything of value;
- The offer or receipt of any kickback, loan, fee, reward or other advantage; or
- The giving of aid or donations designed to exert improper influence.

Acts of 'Bribery' are defined as designed to influence individuals to act dishonestly in the performance or discharge of their duty. 'Corruption' can be defined as a misuse of office, power or influence for private gain.

4.2 Bribery Act

Bribery is any activity that is a criminal offence under the Bribery Act 2010. There are four such offences ("the Bribery Act Offences") and they consist of:

- Bribing another person;
- Being bribed;
- Bribing a foreign public official; and

- Failure of a commercial organisation to prevent bribery.

5. Bribery and Corruption Prevention Measures

In developing this policy, Crown London has undertaken a robust process to identify bribery and corruption risks and to design a targeted compliance programme to prevent, detect and manage potential issues of bribery and corruption. The following key measures will govern its proper application and effectiveness.

5.1 Proportionate Procedures

Adequate anti-bribery procedures should be proportionate to those risks of bribery faced by Crown London; this policy is intended to represent that principle.

An initial assessment of the risk of bribery across the organisation has resulted in Crown London creating a policy with clear guidelines, and practical advice for the prevention of acts of bribery and corruption.

5.2 Top Level Commitment

As the Managing Director has expressed in the introduction to this policy, the Board and Senior Management are fully committed to the implementation of a zero-tolerance approach to bribery and corruption. The implementation of the policy will be led by the Senior Management team who will foster a culture within Crown London in which bribery and corruption is never acceptable.

5.3 Risk Assessment

A risk assessment has been undertaken by Crown London and risks have been identified, that does not mean that bribery exists in these areas, simply that these areas are recognized as where the potential for bribery and corruption could occur.

5.4 Due Diligence Measures

Appropriate due diligence must always be conducted on relevant counterparties.

Crown London must be aware of who it is doing business with and have documentary evidence to justify the relationship. Crown London must ensure the people with whom it is conducting business are suitable to be associated with Crown London and that the relationship will be free from any element of bribery or corruption.

Crown London Senior Management and any other employees who have authority to approve the appointment or engagement of contractual counterparties must ensure that the appropriate due diligence is conducted in relation to their appointment or engagement. On-going due diligence will then be maintained in relation to Crown London's ongoing relationship with those counterparties.



Relevant counterparties should be made aware that they will be subject to appropriate diligence measures as a condition of their appointment.

Crown London must not enter into any material arrangement with a third party intermediary which would give rise to an event or circumstance that could constitute an act of bribery that would reasonably be expected to bring discredit to Crown London or the gaming industry.

All accounts, invoices, receipts and other documents and records relating to dealings with associates and other business contacts, will be prepared and maintained with strict accuracy and transparency.

5.5 Effective Communication, Implementation and Training

Crown London must provide regular training to all key staff and any subsequent new employees regarding Crown London's policy on bribery and corruption which will:

- Assist with the identification of corruption and bribery risk;
- Provide effective mitigation techniques; and
- Enforce Crown London's zero-tolerance policy on bribery and corruption.

Any new developments such as significant new bribery risks will be communicated to staff as they arise.

5.6 Legal Liability, Monitoring & Reporting

Employees should be aware that under the provisions of the Bribery Act, it can be a criminal offence to make or receive a bribe or a payment such as a 'facilitation payment', or to engage in other corrupt practices, such as corruptly overlooking a matter that ought not to be overlooked, anywhere in the world.

Employees may also be at risk of criminal prosecution either in the UK or overseas in these circumstances, which may have serious consequences, including being refused permission to leave a country pending trial. Crown London will report incidents where corrupt practices are suspected, to the appropriate authorities for action.

Employees who are in a position where they feel that they may be required or expected to act in a corrupt manner should refer to the Crown London Anti-Bribery and Corruption Policy, and immediately report the matter.

Crown London encourages all employees to raise concerns with their supervisor or manager, in the first instance and as soon as practicable, or they may report improper behaviour to any of the following: the Managing Director; the Head of Compliance; the Surveillance Manager; or Stoptline. In the event that an employee (including third parties, such as contractors and/or suppliers) wishes to disclose a concern to an independent person, in confidence, they may do so via the Whistleblower Hotline 'Stoptline', in the following ways:

- Via Crown Hub, at www.crownaspinalls.stoplinereport.com;
- Via email, at crownaspinalls@stoptline.com.au;
- Post, to Crown London, c/o Stoptline, PO Box 403, Diamond Creek, VIC 3089, Australia;

- Telephone, 0808 178 3990; and
- Stoptime App, downloaded from iTunes or Google Play.

Any employee who fails to report circumstances where they or colleagues may be giving or receiving bribes or facilitation payments or otherwise acting corruptly will be regarded as committing an act of gross misconduct and may be liable to disciplinary action including dismissal.

This policy will be reviewed on a regular basis to ensure it continues to be appropriate for Crown London and its business.

Anti-bribery controls will be routinely checked as part of the quarterly compliance audits and feature in the Annual Report by the Money Laundering Reporting Officer (**MLRO**).

6. Record Keeping

6.1 Financial Records

Crown London must keep written financial records that correctly record and explain its transactions. Undisclosed or unrecorded funds, payments or receipts are prohibited.

6.2 Governance

An Anti-bribery and Corruption governance framework has been developed that will include all relevant material for this policy including:

- Anti-Bribery and Corruption Policy Statement;
- Crown Resorts Limited Anti-Bribery and Corruption Policy;
- Risk Assessment documentation;
- An 'approved' list of suppliers;
- Anti-Bribery and Corruption Audit Reports;
- Whistleblower (Stoptime) Policy; and
- Training.

7. Key Risk Areas for Bribery and Corruption

7.1 Third Party Intermediaries

Crown London must not enter into any material arrangement with a third party that would give rise to an event or circumstance that could constitute an act of bribery, that would reasonably be expected to bring discredit to Crown London or the gaming industry.



7.2 Gifts, Hospitality and Entertainment

Corporate hospitality, entertainment of patrons, or the acceptance of gifts or tips is not prohibited by the Bribery Act provided it is reasonable in cost, proportionate to the business relationship and given in good faith.

Gifts, hospitality and entertainment must never be given with the aim of influencing a business decision or securing an unfair business advantage.

All gifts, hospitality and entertainment must be properly recorded in the Gifts and Hospitality Register, with details of the person authorising the gift and the estimated value. All such gifts, hospitality and entertainment must be made in accordance with this policy and the Gifts, Hospitality and Entertainment Policy.

7.3 Charitable or Political Donations

Crown London must not make any charitable, political donations or sponsorship as a means of obtaining an improper advantage to Crown London business and must not be used as a means of camouflaging a bribe, in conjunction with the Crown Resorts Political Donations Policy.

Appropriate due diligence must also be conducted on proposed recipients of material charitable donations or sponsorships to ensure that those funds will not be utilized in contravention of this policy.

7.4 Gratuities

Gratuities from patrons may be legitimately accepted by non-gaming staff for the provision of normal Patron service. However, members of staff should contact their line manager if they feel a gratuity has been provided to them or another person, for anything other than the provision of normal Patron service.

Gratuities for gaming staff are highly regulated and can be accepted in accordance with the Crown London Acceptance of Gaming Gratuities Policy.

7.5 Facilitation Payments

Facilitation payments are payments made to a government official or employee for their benefit, to expedite or secure the performance of routine or necessary government action by a government agency (such as the issue of a permit or licence).

Crown London prohibits the use of facilitation payments whether directly or by a third party.

7.6 Conflict of Interest

A conflict of interest exists where loyalties are divided.



Crown London Senior Management and employees must guard against any potential conflict of interest while acting on behalf of or employed by Crown London. The following situations must be avoided:

- Making, influencing or participating in Crown London business decisions that provide a personal benefit to friends, family or associates; and
- Involvement in any business activity or decision with relevance to Crown London that is fraudulent or corrupt or may be inconsistent with Crown London activities.

8. Contractual Provisions

Material agreements with relevant counterparties must all include provisions requiring compliance with anti-bribery and corruption legislation and should provide Crown London with rights to satisfy itself with the counterparty's compliance with those provisions.

Anti-bribery and corruption provisions should also allow Crown London to terminate arrangements with counterparties where a breach or anticipated breach of anti-bribery and corruption legislation arises or where there is a non-compliance with requirements of the relevant provision.

Crown London Employment contracts will include a clause that any involvement in bribery will result in disciplinary action and may lead to summary dismissal. The staff handbook also stresses the importance that Crown London places on anti-bribery compliance.

9. Reporting of Violations and Concerns

Crown London wishes to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. There are confidential means of reporting those concerns to Management, The MLRO or the use of the Confidential Hotline (Whistleblower Program).

All reports of known or suspected bribery or corruption will be handled by Crown London sensitively and with appropriate confidentiality. Crown London will act swiftly in evaluating all such reports.

10. Disciplinary Action

Violations of anti-bribery and corruption laws can result in severe fines and criminal penalties for Crown London, its Senior Management and employees, as well as disciplinary action where relevant by Crown London, up to and including termination of employment.

11. Revision History

Date Issued	Version	Description of Change	Author
November 2011	1.0	First Issue	P Wilson D Livermore
September 2013	2.0	Re-branded Crown Aspinalls	Natasha Lee
January 2014	3.0	Re-drafted: Incorporation of Crown Policy	Natasha Lee
June 2017	4.0	Up-date year - housekeeping	Natasha Lee
December 2019	5.0	Alignment with Crown Resorts ABC, Whistleblower (Stoptline), including Reporting obligations and general updating and housekeeping	K Batten
April 2022	6.0	General housekeeping	L Urgosova

12. Certification

Responsibility	Name	Department	Signature	Date
Prepared By	Natasha Lee	Compliance		Jan 2014
Approved By	Howard Aldridge	Managing Director		Jan 2014
Prepared By	Natasha Lee	Compliance		June 2017
Approved By	Ejaaz Dean	Managing Director		June 2017
Prepared By	Kevin Batten & Kyle Summerfield	MLRO		December 19
Approved By	Tracey Stevenson	GM Compliance & Integrity		December 19
Prepared By	Linda Urgosova	Compliance		April 2022
Approved By	Linda Urgosova	Compliance		