

## Perth Casino Royal Commission

## STATEMENT OF MARYNA FEWSTER

**Name:** Maryna Fewster

**Address:** Contains sensitive information

**Position:** Non-executive Director, Burswood Limited Board

**Date:** 3 August 2021

**A.** In this Statement I refer to:

- (i) Crown Resorts Limited and subsidiaries of Crown Resorts Limited (**Crown Group**); and
- (ii) Burswood Nominees Limited (**Burswood Nominees**), Burswood Resort (Management) Ltd, Burswood Hotel Pty Ltd, Burswood Catering and Entertainment Pty Ltd and Burswood Property Holdings Pty Ltd, which are all subsidiaries of Burswood Limited (**Crown Perth**).

Unless indicated otherwise, I make this statement from my own knowledge or on the basis of documents of the Crown Group which I have reviewed.

**B.** Overview

- (i) I was appointed as a Director of Burswood Limited with effect from 18 July 2019. During this time, I have only been a Director of Burswood Limited and I am the only Director of Burswood Limited who does not hold an executive position within the Crown Group or served on the Crown Resorts Limited Board.
- (ii) During my time as a Director of Burswood Limited:
  - (a) the persons occupying the role of Chairperson have been Mr John Alexander, Mr John Poynton and Ms Helen Coonan;
  - (b) the Burswood Limited Board has met on 10 occasions for around an hour on each occasion;
  - (c) Crown Resorts Limited Board meetings were scheduled to and took place before Burswood Limited Board meetings; and

- (d) many Burswood Limited Board papers were approved at the Crown Resorts Limited Board meeting and then included in Burswood Limited Board packs for noting.
- (iii) In the period from August to November 2019, I was focused on meeting people and completing my inductions. During this period, Mr Alexander was the Chairperson. From February 2020 to date, the impact of COVID-19 on Crown Perth has been a high priority for the Board of Burswood Limited, with the Casino being shut or under heavy restrictions for a large part of the last 18 months. Being complicated and expensive to shut down and stand-up, with a huge workforce, this period has been extremely challenging for Crown Perth. There were 5 board meetings in 2020, with Mr Poynton as the Chairperson.
- (iv) From December 2020 until the present, the Independent Liquor and Gaming Authority Inquiry in NSW (**ILGA Inquiry**) has been completed and Royal Commissions into the Crown Group have commenced in Victoria and Western Australia. Many directors and executives have departed the Crown Group and Crown Perth during this period. I have not had any involvement in decisions regarding the departure of these individuals or the appointment of any replacements. In all cases, I have been informed about appointments after they have been made. I have also had ongoing issues with the tardiness of the Burswood Limited Board papers, which has given me very little time to read and consider the information provided.
- (v) I met with Ms Coonan, the current Chairperson of Burswood Limited for the first time on 9 March 2021 in Perth. It was a 45-minute introductory meeting. At this meeting I raised the fact that Burswood Limited had not had a Board meeting since December 2020. Our next meeting was convened on 14 April 2021, after the cancellation of the February Board meeting. At this meeting, I addressed the Chairperson and the senior executives with a number of concerns and requests. Ms Coonan responded by letting me know that the Crown Resorts Limited Board had initiated a review and had engaged external advisors to assess the structure of the Boards in the Crown Group, with streamlining and centralising being considered.
- (vi) On 10 May 2021, I saw an announcement on the ASX that Crown Resorts Limited had appointed Mr Steve McCann as the Chief Executive Officer (**CEO**). I reached out to Mr McCann by email on 9 June 2021 to introduce myself and to schedule a meeting time. Subsequently, I had a phone introduction with Mr McCann.
- (vii) On 6 July 2021, I was summonsed to attend the Perth Casino Royal Commission to give evidence. In a covering letter to the Summons, I was invited by the Solicitors Assisting this Royal Commission to prepare a statement addressing the topics listed at Schedule 1 to that letter.
- (viii) I address each of those topics below, using corresponding numbers.

## My role

### 1. The date of your appointment and (if applicable) resignation as a director of Burswood Limited

I received a letter of appointment dated 2 July 2019 (**FEW.0001.0001.0028**), which I signed on 15 July 2019. My appointment took effect from 18 July 2019, the same day my Casino Key Employee Licence commenced (**FEW.0001.0001.0054**)

I remain a director of Burswood Limited.

### 2. The circumstances by which you came to become a director of Burswood Limited

In early 2019, I met with Mr Alexander and Mr Poynton who were both on the Board of Burswood Limited at the time. We met on 2 or 3 occasions. During those initial meetings, Mr Alexander and Mr Poynton asked me whether I was interested in being appointed to the Board of Burswood Limited.

I was interested in the appointment for the following reasons:

- (i) the Perth Casino provides employment for many Western Australians and is a significant part of the social fabric of the community and I considered the appointment would give me the opportunity to contribute to economic development in Western Australia;
- (ii) Mr Poynton and Mr Alexander told me my skillset and experience in driving operational excellence and change management would be complementary to the Board's existing skillset; and
- (iii) Mr Poynton and Mr Alexander told me they wanted to appoint a local Board member with a good understanding of the Perth consumer and corporate markets.

On 18 March 2019, I informed Mr Alexander that I required the approval of my employer at Seven West Media (**SWM**). I received that approval shortly thereafter.

On 31 May 2019, Ms Mary Manos, Company Secretary and General Counsel, emailed me to inform me that the Crown Resorts Limited Board had approved my appointment, subject to the usual regulatory approvals. The email attached the consent to act as a Director form, which I signed on 4 June 2019 (**FEW.0001.0001.0248**).

On 2 July 2019, I received the letter of appointment, which is referred to in my answer to question 1 of this Statement.

**3. Whether you sat on any committees of the board of Burswood Limited or working groups during your tenure as a director. Provide details of the committees and working groups, including its duration, purpose, composition and reporting lines**

I have not sat on any committee or working group during my tenure on the Board of Burswood Limited. I am not aware of the existence of any sub-committees or working groups of the Burswood Limited Board.

**4. Whether you held any other positions or roles within the Crown Group<sup>1</sup> during your tenure as a director and, if so, the nature and content of the position(s) or role(s)**

During my tenure as a Director on the Burswood Limited Board, I have not held any other positions or roles with Crown Resorts Limited or with any other entity in the Crown Group.

**Qualifications and expertise**

**5. Your qualifications, expertise and experience generally**

I joined SWM in 2016, initially as a consultant, before being appointed as the Chief Operating Officer (**COO**) in 2017. In June 2018, I was appointed as CEO. As CEO, I am responsible for the Western Australian operations of Seven West Media. This includes The West Australian, The Sunday Times, Channel 7, thewest.com.au, perthnow.com.au, Community News Papers and Regional News Papers.

During my time at SWM, I have:

- (i) re-positioned the culture in the business;
- (ii) transformed the siloed operations into an integrated business;
- (iii) refreshed the leadership team to align with our audience and customers;
- (iv) delivered a growth strategy;
- (v) created and implemented the digital strategy, to deliver a new revenue channel through digital products; and
- (vi) delivered a sustainable cost saving plan, driving significant annual cost savings.

From 2005 to 2015, I was employed by iiNet. From 2005 to 2009, I held the position of General Manager Corporate Services. From 2009 to 2011, I held the position of Chief Customer Officer, and from 2012 to 2015 I held the position of the COO.

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<sup>1</sup> In this Schedule, "Crown Group" means Crown Resorts Limited and any Subsidiary of Crown Resorts Limited.

Throughout my career at iiNet, I had a range of responsibilities including sales and marketing, customer relationship management and customer and corporate services. I also carried the responsibility for the profit and loss of the residential business of 900,000 customers. The residential business comprised the sale of broadband, telephone, mobile, content and hardware services, which contributed more than \$120 million in earnings, before the deduction of interest, taxes, depreciation, and amortisation, from annual revenue of over \$800 million. I led a team of over 2,500 staff in 8 offices over 3 countries.

As a senior executive with iiNet, I had a standing invitation to all board meetings and held the following governance roles:

- (i) member of the Remuneration and Nominations Committee;
- (ii) member of the Strategy Committee; and
- (iii) member of the iiNet Takeover Defence Team.

From 1997 to 2004, I was employed by ihug Limited. ihug was New Zealand's third largest internet service provider. In 2003 ihug was acquired by iiNet.

I also hold, or previously held, the following directorships:

- (i) from January 2017 to November 2019, I was a Non-Executive Director on the Board of Edith Cowan College;
- (ii) from November 2015 to November 2017, I was a Non-Executive Director on the Board of the West Coast Eagles;
- (iii) in October 2015, I was appointed to the Board of Celebrate WA as a Non-Executive Director. I remain a Non-Executive Director on the Board of Celebrate WA;
- (iv) from May 2017 to May 2019, I was a Non-Executive Director on the Board of Community News Group. In May 2019, SWM acquired 100% of Community News Group;
- (v) since April 2019, I have remained a Trustee of the Channel 7 Telethon Trust; and
- (vi) as previously noted, I was appointed to the Board of Burswood Limited in July 2019 as a Non-Executive Director. I remain a Non-Executive Director on the Board of Burswood Limited.

**6. Your qualifications, expertise and experience specifically in relation to:**

**(a) casino operations generally**

Prior to my appointment to the Board of Burswood Limited, I did not have any qualifications or general casino operations experience or expertise.

**(b) risk management in relation to casino operations generally**

Prior to my appointment to the Board of Burswood Limited, I did not have any qualifications or experience or expertise in risk management in relation to casino operations generally.

**(c) in particular, and in the context of casino operations**

Prior to my appointment to the Board of Burswood Limited, I did not have any particular qualifications or experience or expertise in the context of casino operations.

**(d) AML/CTF risk management**

Prior to my appointment to the Board of Burswood Limited, I did not have any Anti-Money Laundering or Counter-Terrorism Financing (**AML/CTF**) risk management qualifications or experience or expertise.

**(e) problem gambling risk management**

As a Non-Executive Director on the Board of the West Coast Eagles, I received some training on problem gambling risk management.

**(f) electronic gaming machine risk management**

Prior to my appointment to the Board of Burswood Limited, I did not have any electronic gaming machine risk management qualifications or experience or expertise.

**(g) junket operations risk management**

I have no qualifications or experience or expertise in junket operations risk management.

**(h) marketing in foreign countries, in particular China**

I have no qualifications or experience or expertise in marketing in foreign countries.

**(i) vulnerability of operations to criminal infiltration/association risk management**

Prior to my appointment to the Board of Burswood Limited, I did not have any qualifications or experience or expertise in the vulnerability of operations to criminal infiltration/association risk management.

**7. What training or induction, if any, were you given at the time appointment as a director of Burswood Limited:**

**(a) generally; and**

**(b) in relation to matters referred to in 6(a)-(c) above**

I did not receive any training on appointment as a Director of Burswood Limited. I received an induction pack, which included:

- (i) the Burswood Limited Board meeting dates for 2019 and 2020;
- (ii) the Burswood Limited Constitution, dated 22 October 2002;
- (iii) the Crown Resorts Limited Code of Conduct for Directors, dated February 2008;
- (iv) the Crown Resorts Limited Anti-bribery and Corruption Policy, dated August 2017;
- (v) the Crown Resorts Limited Securities Trading Policy, dated 11 December 2018;
- (vi) a Deed of Access, Insurance and Indemnity;
- (vii) my Letter of Appointment dated 2 July 2019; and
- (viii) a Tax File Declaration form.

As part of my induction, and within the first few months of being appointed to the Burswood Limited Board, I received the following briefings:

- (i) in or about August 2019, I received a briefing from Mr Joshua Preston, Chief Legal Officer of Australian Resorts, on the structures in place to manage to AML/CTF Risk in the Perth Casino. I was informed that the current AML/CTF program had been reviewed and a new joint AML program for all entities in the Crown Group had been proposed;
- (ii) on 7 October 2019, I received a briefing from Mr Damir Kucan, Executive Senior Manager of Human Resources. The briefing included information about the various programs being undertaken by Human Resources;
- (iii) I received a briefing from Mr Alan McGregor, Chief Financial Officer (**CFO**) of Crown Resorts Limited and Mr Lonnie Bossi, the Chief Operations Officer (**COO**) of Crown Perth at the time. I was informed of the growth initiatives and key strategies for the Perth Casino for the period the financial year 2020 to the financial year 2023. Following this session, I was given a guided tour of

the Perth Casino. As part of the guided tour, I was shown the surveillance systems in place; and

- (iv) on 18 October 2019, I met with Ms Cori Cairns, the General Manager for table games. We had a high-level discussion about her role.

**8. What training, if any you were given during your tenure as a director of Burswood Limited:**

**(a) generally;**

**(b) in relation to matters referred to in 6(a)-(c) above**

On 2 November 2020, the revised joint program, 'Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Program (Part A)' was approved by the Burswood Limited Board (**FEW.0001.0001.0092**).

On 8 March 2021, Mr Steven Blackburn, Chief Compliance and Financial Crime Officer, delivered some training on AML/CTF to the Board of Burswood Limited and executive management (**FEW.0001.0001.0056**).

On 11 June 2021, I had a one on one meeting with Mr Blackburn. Mr Blackburn stepped me through the Financial Crime and Compliance Board Pack (**FEW.0001.0001.0249**) that he presented to Crown Resorts Limited Board. The Financial Crime and Compliance Plan was later included in the Burswood Limited Board report for its June Board meeting.

**Governance**

**9. Your understanding of your responsibilities as a director of Burswood Limited**

As a director of Burswood Limited, I am responsible for the governance, strategic direction and management of that company. Together with the other Board members, it is my responsibility to ensure the company's goals and objectives are met.

**10. Whether and to what extent Crown Resorts Limited, Crown Melbourne Limited or any other entity within the Crown Group, influenced or directed the manner of governance of Burswood Nominees Limited**

Crown Resorts Limited is the listed parent company under which numerous subsidiaries are held, including the entities comprising Crown Perth.

The entities within the Crown Group have varying responsibilities in respect of the Perth Casino.

Most of the changes to policy and strategic direction flows from the Crown Resorts Limited Board to Burswood Nominees, as a subsidiary.

During the Burswood Limited Board meeting on 16 April 2021, 4½ months after the previous Board meeting held on 3 December 2020, I tabled my concerns about the lack



of information I had as a Director of Burswood Limited. I read from my notes, which I had prepared in advance of the meeting (**FEW.0001.0001.0080**).

**11. The risk management system applicable to the activities of Burswood Nominees Limited**

The risk management function is a centralised function. The Risk Executive reports to the CEO of Crown Resorts Limited. The risk management systems and framework are determined by the Crown Resorts Limited Board and its Risk Management Committee. The systems and framework are implemented locally.

The risk management system applicable to the activities of Burswood Nominees is accurately reflected in the Crown Resorts Risk and Compliance Culture Framework (**FEW.0001.0001.0081**).

**12. The management structure applicable to the activities of Burswood Nominees Limited**

Burswood Nominees forms part of the Crown Perth operating group. The management structure applicable to the activities of Burswood Limited is applicable to all of Crown Perth.

The management structure applicable to Crown Perth is led by Mr Bossi, CEO of Crown Perth, who reports to Mr McCann, CEO and Managing Director of Crown Resorts Limited.

As at 21 July 2021, the executive management team with a direct reporting line to Mr Bossi are:

- (i) Mr Andrew Hill, Chief Operating Officer Food and Beverage and Entertainment;
- (ii) Mr Shannon Blake, Executive General Manager Gaming Machines and Commercial Strategy;
- (iii) Ms Cori Cairns, Executive General Manager Table Games; and
- (iv) Mr Claude Marais, General Counsel.

Other executive functions (many of which are centralised) have dotted line responsibility to Mr Bossi.

**13. The employer of each person within the management structure of Burswood Nominees Limited**

I am not aware which company in the Crown group is the employer of each person in the management structure of Burswood Nominees.

**14. Whether and to what extent persons within the management structure of Burswood Nominees Limited were influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne Limited or any other entity within the Crown Group in the performance of their duties and responsibilities**

The management structure applicable to the activities of Burswood Nominees is applicable to all of Crown Perth.

Mr Bossi, the CEO of Crown Perth, reports directly to the CEO of Crown Resorts Limited. Mr Bossi has a small executive team reporting directly to him. However, the majority of executive functions are centralised and report to the CEO of Crown Resorts Limited. The Executive Chairperson of Crown Resorts Limited is also the Chairperson of Burswood Limited.

Mr Bossi submits and presents papers relating to Crown Perth to the Crown Resorts Limited Board, prior to them being presented at Burswood Limited Board meetings.

Most of the changes to policy and strategic direction flows from Crown Resorts Limited Board to Burswood Nominees, as a subsidiary.

**15. Whether and to what extent Burswood Limited influenced or directed the manner of governance of Burswood Nominees Limited**

The manner of governance of Burswood Nominees was not influenced or directed by Burswood Limited. Governance structures and frameworks for Crown Perth are developed and monitored by the Crown Resorts Limited Board and its sub-committees. Most governance functions are centralised and those executives report to Mr McCann, Crown Resorts Limited's CEO.

The Burswood Limited Board receives reports on Crown Perth governance matters for noting. These reports are provided to the Burswood Limited Board, once provided to the Crown Resorts Limited Board.

**16. The demarcation of roles and responsibilities as between the board of Burswood Nominees Limited, on the one hand, and the management of Burswood Nominees Limited as delegate of the board, on the other**

I am not a Director of Burswood Nominees and, therefore, I do not know about the demarcation of roles and responsibilities.

**17. Whether and to what extent the assets of Burswood Nominees, including the casino licence, have been used as security for the debts of any other company or entity within the Crown Group**

On 3 April 2020, I received a circular resolution and an extract of a re-financing paper presented to the Board of Crown Resorts Limited. The extract recorded that security would be granted over the properties of Crown Towers Perth and the One Queensbridge development.

The resolution sought approval from the Directors of Burswood Limited, which wholly owns Burswood Nominees, to allow Burswood Nominees to enter into the re-financing facility in its own capacity and as Trustee for the Burswood Property Trust.

**18. The risk management system applicable to Burswood Limited**

As described in my answer to question 11 above, the risk management systems and framework are determined by the Crown Resorts Limited Board and its Risk Management Committee. The systems and framework are implemented locally by Crown Perth.

The risk management system applicable to the activities of Burswood Limited is accurately reflected in the Crown Resorts Risk and Compliance Culture Framework (FEW.0001.0001.0081).

**19. The management structure applicable to Burswood Limited**

As described in my answer to question 12 above, the management structure applicable to the activities of Burswood Limited is applicable to all of Crown Perth.

The management structure applicable to Crown Perth is led by Mr Bossi, CEO of Crown Perth, who reports to Mr McCann, CEO and Managing Director of Crown Resorts Limited.

As at 21 July 2021, the executive management team with a direct reporting line to Mr Bossi are:

- (i) Mr Hill, Chief Operating Officer Food and Beverage and Entertainment;
- (ii) Mr Blake, Executive General Manager Gaming Machines and Commercial Strategy;
- (iii) Ms Cairns, Executive General Manager Table Games; and
- (iv) Mr Marais, General Counsel.

Other executive functions (many which are centralised) have dotted line responsibility to Mr Bossi.

**20. The employer of each person within the management structure of Burswood Limited**

I am not aware which company in the Crown Group is the employer of each person in the management structure of Burswood Limited.

**21. Whether and to what extent persons within the management structure of Burswood Limited were influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne Limited or any other entity within the Crown Group in the performance of their duties and responsibilities**

As described in my answer to question 14 above, the management structure applicable to the activities of Burswood Limited is applicable to all of Crown Perth.

Mr Bossi, the CEO of Crown Perth, reports directly to the CEO of Crown Resorts Limited. Mr Bossi has a small executive team reporting directly to him. However, the majority of executive functions are centralised and report to the CEO of Crown Resorts Limited. The Executive Chairperson of Crown Resorts Limited is also the Chairperson of Burswood Limited.

Mr Bossi submits and presents papers relating to Crown Perth to the Crown Resorts Limited Board, prior to them being presented at Burswood Limited Board meetings.

Most of the changes to policy and strategic direction flow from the Crown Resorts Limited Board to Burswood Limited, as a subsidiary.

**22. The demarcation of roles and responsibilities as between the board of Burswood Limited, on the one hand, and the management of Burswood Limited as delegate of the board, on the other**

The Board of Burswood Limited are responsible for the governance, strategy and oversight on commercial operations of the Perth Casino. The management of Crown Perth run the day-to-day operations of the Perth Casino.

As the head of management of Crown Perth, Mr Bossi reports and is accountable to the Board of Burswood Limited in relation to the operations of the Perth Casino.

I am currently the only Board member of Burswood Limited who is not in a management role or a Director of Crown Resorts Limited. Up until his recent resignation, Mr Poynton was the only other Board member who did not hold a management position. However, he was a Director of Crown Resorts Limited.

**23. The risk management system applicable to Burswood Resort (Management) Limited**

As described in my answers to questions 11 and 18 above, the risk management systems and framework are determined by the Crown Resorts Limited Board and its Risk Management Committee. The systems and framework are implemented locally by Crown Perth.

The risk management system applicable to the activities of Burswood Resort (Management) Limited is accurately reflected in the Crown Resorts Risk and Compliance Culture Framework (**FEW.0001.0001.0081**).

**24. The management structure applicable to Burswood Resort (Management) Limited**

As described in my answers to questions 12 and 19 above, the management structure applicable to the activities of Burswood Resort (Management) Limited is applicable to all of Crown Perth.

The management structure applicable to Crown Perth is led by Mr Bossi, CEO of Crown Perth, who reports to Mr McCann, CEO and Managing Director of Crown Resorts Limited.

As at 21 July 2021, the executive management team with a direct reporting line to Mr Bossi are:

- (v) Mr Andrew Hill, Chief Operating Officer Food and Beverage and Entertainment;
- (vi) Mr Shannon Blake, Executive General Manager Gaming Machines and Commercial Strategy;
- (vii) Ms Cori Cairns, Executive General Manager Table Games; and
- (viii) Mr Claude Marais, General Counsel.

Other executive functions (many of which are centralised) have dotted line responsibility to Mr Bossi.

**25. The employer of each person within the management structure of Burswood Resort (Management) Limited**

I am not aware which company in the Crown group is the employer of each person in the management structure of Burswood Resort (Management) Limited.

**26. Whether and to what extent persons within the management structure of Burswood Resort (Management) Limited were influenced, directed or accountable to Crown Resorts Limited, Crown Melbourne Limited or any other entity within the Crown Group in the performance of their duties and responsibilities**

As described in my answers to questions 14 and 21 above, the management structure applicable to the activities of Burswood Resort (Management) Limited is applicable to all of Crown Perth.

Mr Bossi, the CEO of Crown Perth, reports directly to the CEO of Crown Resorts Limited. Mr Bossi has a small executive team reporting directly to him. However, the majority of executive functions are centralised and report to the CEO of Crown Resorts Limited.

The Executive Chairperson of Crown Resorts Limited is also the Chairperson of Burswood Limited.

Mr Bossi submits and presents papers relating to Crown Perth to the Crown Resorts Limited Board, prior to them being presented at Burswood Limited Board meetings.

Most of the changes to policy and strategic direction flows from Crown Resorts Limited Board to Burswood Resort (Management) Limited, as a subsidiary.

**27. The demarcation of roles and responsibilities as between the board of Burswood Resort (Management) Limited, on the one hand, and the management of Burswood Resort (Management) Limited as delegate of the board, on the other**

I am not a director of Burswood Resort (Management) Limited. I cannot, therefore, comment on the demarcation of roles and responsibilities.

**28. The entities associated with the organisation and conduct of gaming operations at the Perth Casino, and the relationship between those entities and Burswood Nominees Limited**

The Melbourne based entities in the Crown Group had control over the gaming operations for international VIP guests and junkets, although I do not know which specific entity. Burswood Nominees is ultimately a wholly owned subsidiary of Crown Resorts Limited.

The responsibility for other gaming operations at the Perth Casino sits with Mr Bossi. Mr Bossi's role for the majority of my tenure as a Director of Burswood Limited was as COO of Crown Perth, with responsibility for gaming tables and machines. This remains his responsibility as CEO of Crown Perth. In every Burswood Limited Board meeting I have attended to date, Mr Bossi has delivered the CEO report. His report included reports on gaming performance, as well as any operational changes to table gaming and electronic gaming.

**29. Whether you were aware of cl 22.1 (r) and cl 22.1 (ra) of the Casino Agreement between Crown Melbourne Ltd and the Victorian Commission for Gambling and Liquor Regulation and, if so:**

**(a) whether those clauses were ever discussed by or with the board of Burswood Limited or Burswood Nominees Limited during your tenure as a director; and**

**(b) how those clauses were interpreted by, and applied to, the operations of Burswood Limited and Burswood Nominees Limited**

I was not aware of cl 22.1 (r) or cl 22.1 (ra) of the Casino Agreement between Crown Melbourne Ltd and the Victorian Commission for Gambling and Liquor Regulation until I heard of it during the Royal Commission into the Casino Operator and Licence (**Victoria Casino Royal Commission**). Since the hearings in the Victoria Casino Royal

Commission commenced, I have read about or watched the hearings, as much as possible.

- 30. The phrases 'risk appetite' and 'risk tolerance' are commonly used in risk management aspects of corporate governance. Acknowledging that the reach and understanding of those phrases is of relatively recent origin, please explain your understanding of the approach and attitude of Burswood Limited, Burswood Nominees Limited and Burswood Resort (Management) Limited to risk appetite and risk tolerance:**

**(a) at the commencement of your tenure as a director**

At the commencement of my tenure, my broad understanding of 'risk tolerance' is that it indicates the level of risk which a Board is willing to accept before additional measures are implemented to bring that risk back to an acceptable level.

Crown Resorts Limited has responsibility for setting the risk and compliance framework that governs all entities within the Crown Group. Crown Resorts Limited also has a Risk Management Committee. The Risk Executive is a centralised function under Crown Resorts Limited.

Part of the risk and compliance framework is a 'risk appetite dashboard' (Dashboard), which is included in each Burswood Limited Board pack. The Dashboard represents the risk tolerance of Crown Resorts Limited, which is based on a '5 x 5 corporate risk profile matrix'.

The key business risks and their risk ratings are included in each Burswood Limited Board pack. The risk rating of a key business risk is determined after considering the likelihood of key business risk occurring and the consequence of it occurring. If a key business risk is assessed as having a rating of 'high risk' or higher it must be reported to the Board for oversight along with the actions required to reduce the risk back to an acceptable level.

This approach to risk appetite is consistent with my experience as a director on other boards of directors.

**(b) whether it changed from time to time during your tenure**

From reports provided to the Burswood Limited Board in April 2021 (Risk Management Framework Overview Process) and June 2021 (Crown Resorts Risk and Compliance Culture Framework) from Crown Resorts Limited, the oversight of risk has increased following enhancements and structural changes to the risk function that have occurred over the past 12 months.

Crown Resorts Limited changed the internal functions to separate Audit and Risk functions. As a result, Crown Resorts Limited has a Chief Risk Officer and employed a Group GM Internal Audit in May 2021. Additionally, the resourcing within the risk management function has increased.

The position of Chief Risk Officer has been elevated and now forms part of the Crown Resorts Limited Executive leadership team and reports directly to Mr McCann, the CEO of Crown Resorts Limited. The Chief Risk Officer also reports to the Chairpersons of the Risk Management Committee and Crown Melbourne Audit Committee. Since April 2021, the Chief Risk Officer also has a standing invitation to the Burswood Limited Board meetings, because there is no Risk sub-committee for the Burswood Limited Board.

From mid-2020, the frequency of the Crown Resorts Limited Risk Management Committee meetings have increased from 4 per annum to 6 per annum.

Crown Perth manages risk and compliance within the frameworks set by Crown Resorts Limited.

### **International Commission Business**

**31. The historical structure and operation of the 'International Commission Business' (as defined in the Casino (Burswood Island) Agreement or other junket business of the Perth Casino, including as to:**

- (a) its financial model;**
- (b) management responsibility;**
- (c) marketing;**
- (d) the provision of credit or gratuities; and**
- (e) the identification and management of risks**

The Melbourne based entity, Crown Resorts Limited, facilitates and has responsibility over the International Commission Business. Until his resignation in 2020, Mr Barry Felstead was the Senior Executive in charge of international and VIP guests.

Burswood Limited has very little oversight of the International Commission Business and I am not aware of the specifics of the International Commission Business. The information about the International Commission Business that I am aware of includes the key assumptions in the financial year 2020 to the financial year 2023 plan for Crown Perth as to revenue growth and that international VIP guests playing at the Perth Casino would continue to be serviced by the Melbourne based entities of the Crown Group.

Within my first couple of months on the Burswood Limited Board, I recall asking Mr Poynton, Mr Alexander, and Mr Bossi about the International Commission Business. I was told by each of Mr Poynton, Mr Alexander, and Mr Bossi that the International Commission Business is controlled by Melbourne. This includes the recruiting, vetting, logistics and credit limits applicable to the International VIP guests and the other junket business.



Due to COVID-19 and the resultant international travel restrictions, the International Commission Business ceased abruptly by the commencement of the 2020 calendar year. The focus of the Burswood Limited Board for the 2020 calendar year was largely on managing the effects of the COVID-19 restrictions and ensuring the longevity of Crown Perth and the ongoing employment of its staff. The International Commission Business has not been a focus for the Burswood Limited Board.

The International Commission Business clients are hosted by a team in Crown Perth, who report directly to the international team in Crown Melbourne.

**32. The oversight exercised by the board of Burswood Nominees Limited as to the structure and operation of the International Commission Business or other junket business of the Perth Casino**

During my limited tenure as a Director of Burswood Limited there has only been a brief period of International Commission Business activity in Crown Perth. As such, I am not aware of the oversight exercised by the Board of Burswood Nominees as to the structure and operation of the International Commission Business or other junket business at the Perth Casino.

**33. What, if any, investigations or enquiries have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, to ascertain whether the Perth Casino's International Commission Business or other junket business was vulnerable to criminal infiltration or may have been used to facilitate money-laundering**

I am not aware of any such investigations or enquiries.

**34. What, if any, investigations or enquiries have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, into the arrests of employees of the Crown Group in China, and into any potential effects of those arrests on the International Commission Business or other junket business of the Perth Casino**

I am not aware of any such investigations or enquiries.

**AML**

**35. The nature and content of Burswood Nominees Limited's systems, policies and procedures to identify and manage the risks of the Perth Casino operations being used as a vehicle to facilitate money-laundering**

The nature and content of Burswood Nominees' systems, policies and procedures to identify and manage the risks of the Perth Casino operations being used as a vehicle to facilitate money-laundering are determined by the Crown Resorts Limited Board and its Risk Management Committee. The systems, policies and procedures are implemented locally by Crown Perth.

When I commenced as a director, Burswood Limited had commenced the process of reviewing and transforming its framework in respect of AML/CTF.

On 5 August 2019, Mr Preston issued a Memorandum (**FEW.0001.0001.0088**) to the Board of Burswood Limited explaining the review of the AML/CFT framework and the proposed new joint AML/CTF framework.

During the Burswood Limited Board meeting on 8 August 2019, Mr Preston presented to the Board (**FEW.0001.0001.0145**) on the proposed AML/CTF Framework.

On 21 October 2020, I received an email attaching a Memorandum from the Risk Management Committee dated 16 October 2020. The Memorandum noted that the draft AML/CTF program had been reviewed and a revised AML/CTF program was being developed.

On 2 November 2020, the revised joint program, 'Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Program (Part A)' was approved by the Burswood Limited Board (**FEW.0001.0001.0092**).

On 8 March 2021, Mr Blackburn delivered training on AML/CTF to the Burswood Limited Board and senior management (**FEW.0001.0001.0056**).

A Memorandum prepared by Mr Nick Stokes on 11 June 2021 which documented the Financial Crime and Compliance program (**FEW.0001.0001.0171**), was endorsed by the Crown Resorts Limited Board on 24 May 2021, and later submitted to the Burswood Limited Board for noting at the 17 June 2021 board meeting. The Financial Crime and Compliance program included a request to increase funding for resourcing the centralised financial crime and compliance and responsible gaming functions.

The systems, policies and procedures are accurately reflected in the Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Program (Part A) (**FEW.0001.0001.0092**).

**36. The management responsibility within Burswood Nominees Limited for identifying and managing money-laundering risks**

AML/CTF is a group centralised function. Crown Perth operates within the framework and policies set by Crown Resorts Limited. Mr Blackburn commenced as Chief Compliance and Financial Crime Officer in early 2021 and reports to Mr McCann, the CEO of Crown Resorts Limited.

**37. The oversight exercised by the board of Burswood Nominees Limited as to the development and implementation of, and compliance with, its systems, policies and procedures to identify and manage the risks of the Perth Casino operations being used as a vehicle to facilitate money-laundering**

The AML/CTF and risk functions are centralised functions with local implementation. Crown Resorts Limited sets the framework, policies and procedures. The centralised

risk functions are also responsible for testing the controls within the compliance systems and reporting their findings through to the Board of Crown Resorts Limited.

Crown Perth operates within the framework set by Crown Resorts Limited and its sub-committees (**FEW.0001.0001.0092**).

**38. Your knowledge and understanding of any response of Burswood Nominees Limited, Crown Resorts Limited, Burswood Limited and (or) Burswood Resort (Management) Limited to public allegations of money laundering through the Perth Casino and the Melbourne Casino, infiltration of the Perth Casino and the Melbourne Casino by organised crime and associations between Crown and organised crime made at or around the following times**

**(a) September 2014: Four Corners “High Rollers – High Risk? Australian casinos and the threat posed by organised crime”**

I do not have any knowledge or understanding of any such response of any entity within the Crown Group, including Burswood Limited. I was not appointed to the Burswood Limited Board until approximately 5 years later.

**(b) October 2017: Allegations tabled in Federal Parliament by Mr Andrew Wilkie MP**

I do not have any knowledge or understanding of any such response of any entity within the Crown Group, including Burswood Limited. I was not appointed to the Burswood Limited Board until approximately 2 years later.

**(c) April – July 2018: Guardian (allegations of EGM tampering)**

I do not have any knowledge or understanding of any such response of any entity within the Crown Group, including Burswood Limited. I was not appointed to the Burswood Limited Board until approximately 1 year later.

**(d) July 2019: 60 Minutes and Fairfax Media (money laundering and criminal infiltration)**

I had a conversation with Mr John Alexander after the episode had aired. Mr Alexander told me that he considered the episode was deceitful and inaccurate. Subsequently, the Crown Resorts Limited Board published a response to the allegations in major media publications. The response was signed off by each of Mr Alexander, Mr Guy Jalland, Mr Michael Johnston, Hon Helen Coonan, Mr Andrew Demetriou, Mr Geoff Dixon, Ms Jane Halton, Prof. John Horvath, Ms Antonia Korsanos, Mr Harold Mitchell and Mr Poynton (**FEW.0001.0001.0190**).

This public response gave me a level of comfort that the board did not consider those allegations to be true.

I became aware of the publication due to my position as the CEO of SWM and not because of my appointment to the Board of Burswood Limited.

**(e) September 2020: ACLEI release of the Operation Angove Report**

I do not have any recollection of any response to the release of the Operation Angove Report by the Australian Commission for Law Enforcement Integrity.

- 39. What, if any, investigations or enquiries have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, to ascertain whether any bank accounts of Riverbank Investments Pty Ltd or any other bank accounts maintained with respect to the Perth Casino operations may have been used as a vehicle to facilitate money-laundering**

The board papers for the Burswood Limited Board meeting in December 2019 reported that the Commonwealth Bank of Australia would close the Riverbank Investments account. I do not recall any discussions about the Riverbank Investment account or any investigations or enquiries undertaken by Burswood Limited regarding the Riverbank Investments account.

Shortly after the report of the ILGA Inquiry dated 1 February 2021 (**Bergin Report**) was released, I had a conversation with Mr Bossi and asked him about his knowledge of the Riverbank Investments account. Mr Bossi told me he had no previous knowledge of the account.

The board papers for the Burswood Limited Board meeting on 12 February 2021 noted that the Bergin Report had focused on elements of Crown's historical AML/CTF practices, particularly those related to transactions on the Riverbank Investment account.

The board papers stated that Crown Resorts Limited had engaged external experts to assist with the review of the Riverbank Investments account.

The Burswood Limited Board meeting scheduled for 12 February 2021 was cancelled. I do not recall discussing the review of the Riverbank Investment account at any subsequent Burswood Limited Board meeting.

- 40. Whether you know or suspect that any bank accounts maintained with respect to the Perth Casino operations, other than a bank account of Riverbank Investments Pty Ltd, may have been used as a vehicle to facilitate money-laundering**

I do not suspect or know of any bank accounts maintained with respect to the Perth Casino operations, other than a bank account of Riverbank Investments Pty Ltd, that may have been used as a vehicle to facilitate money-laundering.

- 41. Whether any of Burswood Nominees Limited, Crown Resorts Limited, Burswood Limited and (or) Burswood Resort (Management) Limited, or any other company in the Crown Group, received or assisted in receiving payments at any hotel forming part of the Perth Casino complex, or at any other part of the Perth Casino complex, from international customers using a credit or debit card**

**(ordinarily a China Union Pay (CUP) card), with the funds received then being made available for gaming**

I first became aware of the China Union Pay (CUP) card by reading about it during the Victoria Casino Royal Commission. I subsequently telephoned Mr Bossi to ask for further information about the CUP card. Mr Bossi told me that at the time the Melbourne Casino implemented the CUP card, he had made the decision not to implement the CUP card in the Perth Casino complex.

## **Tax and Fees**

### **42. What, if any, investigations or enquiries have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, to ascertain whether there has been any underpayment of tax to the State of Western Australia by Burswood Nominees Limited with respect to the operation of the Perth Casino**

On 7 June 2021, the issue regarding the alleged underpayment of tax in Victoria was reported in the Sydney Morning Herald. I subsequently telephoned Mr Bossi. Mr Bossi told me that the calculation of Casino and Jackpot tax is calculated differently for the Perth Casino. Mr Bossi told me that Crown Perth had received very clear advice for Perth Casino calculations and that the alleged issue for Crown Melbourne did not arise for Crown Perth.

During the 17 June 2021 Burswood Limited Board meeting, Mr McCann and Ms Coonan advised the Board that the reports of the amount of tax owed by Crown Melbourne were overstated. They told the Board of their belief that the Commission had not considered all aspects of Crown Melbourne's tax obligations, and once a full consolidated tax review was complete, it could potentially be the case that Crown Melbourne had in fact overpaid tax and were owed money.

I took a level of comfort in Mr McCann and Ms Coonan's confidence regarding this matter.

On 23 June 2021, I was copied on an email from Ms Coonan to Mr Bossi asking that he 'provide the Directors with assurance that Crown is paying the correct amount of WA State Casino Tax'.

Mr Bossi responded that same day:

- (i) confirming he was satisfied the correct payment of tax had been made, and provided his reasons for that assessment;
- (ii) noting that Ernst & Young had been engaged to review the calculation methodology relative to the State Agreement ratified by the Casino (Burswood Island) Agreement Act 1985 (WA) and that he would keep Directors updated on progress;

- (iii) providing a letter sent to the Chief Casino Officer on Friday 18 June 2021 (**FEW.0001.0001.0292**), responding to a request regarding Casino Tax calculation in Perth in response to a newspaper article in the Sydney Morning Herald; and
- (iv) informing us that on that day, 2 members of the Government Inspectorate had attended the Casino to discuss the matter with our Financial Controller and Gaming Product Manager.

On 7 July 2021, I sent an email to Mr Bossi asking whether Ernst & Young had given an indication of when we would receive their review. By reply email, Mr Bossi informed me that we should receive their response early the following week (the week commencing 12 July 2021) (**FEW.0001.0001.0190**). As at the date of filing this Statement, I have not received that review.

- 43. What, if any, investigations or enquiries have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, to ascertain whether there has been any underpayment of licence fees to the GWC by Burswood Nominees Limited with respect to the operation of the Perth Casino**

I am not aware of any such investigation or enquiry.

- 44. Whether, at any time, in determining the 'Casino Taxable Revenue' (as defined in the Casino (Burswood Island) Agreement of the Perth Casino the cost of goods or services provided as gratuities or loyalty program rewards to gaming patrons have been deducted on the basis that they are 'winnings'?**

Mr Bossi provided a copy of a letter addressed to the Chief Casino Officer on 18 June 2021. In this letter Mr Bossi confirmed the above costs were not included in the calculations (**FEW.0001.0001.0292**).

#### **Problem gambling**

- 45. What, if any, investigations or enquires have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, to ascertain the nature and extent of problem gambling at the Perth Casino.**

I am not aware of any such investigation or enquiry.

- 46. The nature and content of Burswood Nominees Limited's systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino**

The Group General Manager Responsible Gaming is a centralised function, reporting to Mr Blackburn who reports to Crown Resorts Limited CEO, Mr McCann (**FEW.0001.0001.0079**)

The nature and content of Burswood Nominees systems, policies and procedures to identify and manage the risks of problem gambling are determined by the Crown Resorts Limited Board. The systems and framework are implemented locally by Crown Perth.

The nature and content of those systems, policies and procedures are accurately reflected in The Responsible Gaming Framework (**FEW.0001.0001.0194**) and the Responsible Gaming Code of Conduct (**FEW.0001.0001.0216**).

**47. The management responsibility within Burswood Nominees Limited for identifying and managing the risks of problem gambling at the Perth Casino**

The responsible gaming team structure appears in the Responsible Gaming Framework (**FEW.0001.0001.0194**).

The responsible gaming team for Crown Perth is led by Ms Melanie Faulks. The team has a dotted line responsibility to Mr Bossi and a direct reporting line to Ms Sonja Bauer as the Group General Manager Responsible Gaming for Crown Resorts Limited.

**48. The oversight exercised by the board of Burswood Nominees Limited as to the development and implementation of, and compliance with, its systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino**

The responsible gaming function is a centralised function with local implementation. Crown Resorts Limited sets the framework, policies and procedures. Crown Perth operates within the framework set by Crown Resorts Limited and its sub-committees.

**49. What, if any, requests have been made of either Burswood Limited or Burswood Nominees Limited by third parties to conduct research into any aspect of problem gambling by reference to the Perth Casino or by utilising information about the Perth Casino operations, and any responses to such requests**

I am not aware of any such requests.

**Electronic Gaming Machines**

**50. From 2004, the structure and operation of Burswood Nominees Limited's electronic gaming machine business at the Perth Casino, including as to:**

- (a) its financial model;**
- (b) management responsibility;**
- (c) marketing.**

I do not have any knowledge of the structure or operation of the Burswood Nominees electronic gaming machine business at the Perth Casino prior to my appointment to the Board of Burswood Limited in July 2019.

I do not have any knowledge of the financial model of the Perth Casino electronic gaming machine business.

I do not have any knowledge of the marketing of the Perth Casino electronic gaming machine business.

Mr Bossi holds the management responsibility of the Perth Casino electronic gaming machine business.

**51. The oversight exercised by the board of Burswood Nominees Limited as to the structure and operation of its electronic gaming machine business**

I am not aware of the oversight exercised by the board of Burswood Nominees as to the structure and operation of its electronic gaming machine business.

**52. The nature and content of Burswood Nominees Limited's systems, policies and/or procedures for seeking authorisation from the GWC for games to be played on electronic gaming machines**

Mr Bossi represents Crown Perth in dealings with the Gaming and Wagering Commission (**GWC**). Mr Bossi attended regular meetings with the GWC. I have always understood there to be an approval process between the GWC and Crown Perth for the authorisation of electronic gaming machines.

**53. What, if any, investigations or enquiries have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, to ascertain the nature and extent of problem gambling at the Perth Casino associated specifically with electronic gaming machines**

I am not aware of any such investigations or enquires.

**54. The nature and content of Burswood Nominees Limited's systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino associated specifically with electronic gaming machines**

The Crown Resorts Limited responsible gaming systems, policies and procedures are applicable to the activities of Burswood Nominees.

Those gaming systems, policies and procedures are accurately reflected in the Responsible Gaming Framework (**FEW.0001.0001.0194**), the Responsible Gaming Code of Conduct (**FEW.0001.0001.0216**) and the Responsible Gaming Enhancements (**FEW.0001.0001.0246**) (**The Responsible Gaming Systems**).

Some examples of The Responsible Gaming Systems to manage the risk of problem gambling include:

- (i) time limits on playing at electronic gaming machines, table games and electronic table games; and



- (ii) limits on the amount of cash to be inserted at any one time for uncarded play to \$500.00.

**55. The management responsibility within Burswood Nominees Limited for identifying and managing the risks of problem gambling at the Perth Casino associated specifically with electronic gaming machines**

Mr Bossi in his role as CEO of Crown Perth is directly responsible for table games and electronic gaming machines.

The responsible gaming team in Perth, led by Ms Faulks, has a dotted line responsibility to Mr Bossi and a direct reporting line to Ms Bauer as the Group General Manager Responsible Gaming for Crown Resorts Limited. The local team executes and implements The Responsible Gaming Systems as set by Crown Resorts Limited.

**56. The oversight exercised by the board of Burswood Nominees Limited as to the development and implementation of, and compliance with, its systems, policies and procedures to identify and manage the risks of problem gambling at the Perth Casino associated specifically with electronic gaming machines**

Mr Bossi in his role as CEO of Crown Perth is directly responsible for table games and machines.

The responsible gaming team in Perth, led by Ms Faulks, has a dotted line responsibility to Mr Bossi and a direct reporting line to Ms Bauer. The local team executes and implements the responsible gaming policies and procedures as set by Crown Resorts Limited.

Mr Blackburn provided a Memorandum to the Burswood Limited Board, which is included in the 17 June 2021 board pack. It outlines the enhancements to the responsible gaming function at Crown Resorts Limited and its domestic subsidiaries, including the entities within Crown Perth, as endorsed by the Board of Directors of Crown Resorts Limited on 24 May 2021 (**FEW.0001.0001.0290**).

**57. What, if any, investigations or enquiries have been undertaken by the board of Burswood Limited or Burswood Nominees Limited, and when, to ascertain whether there has been any tampering with or adjustment of electronic gaming machines at the Perth Casino to unfairly disadvantage patrons or to increase the risks of problem gambling associated with such machines**

I am not aware of any such investigations or enquiries.

## Gaming and wagering Commission and the Department<sup>2</sup>

- 58. Whether, how and/or to what extent management of the Perth Casino operations was given direction or guidance from the board of either Burswood Limited, Burswood Nominees Limited or any other entity within the Crown Group about when and how generally to communicate with the GWC or the Department about matters to do with the Perth Casino, either generally or in relation to specific subjects**

I am not aware of any direction or guidance given by the Board of Burswood Limited, or the Board of Burswood Nominees or any other entity within the Crown Group to the management of the Perth Casino about when and how to communicate with the GWC or the Department.

Mr Bossi represents Crown Perth in dealings with the GWC. Mr Bossi attends regular meetings with the GWC. Mr Bossi reports to Mr McCann, CEO of Crown Resorts Limited.

In my experience, Mr Bossi provides an update on his interactions with the GWC to the Burswood Limited Board as part of his CEO report.

- 59. Whether, how and/or to what extent management of the Perth Casino operations, as a matter of general practice, informed the board of either Burswood Limited, Burswood Nominees Limited or any other entity within the Crown Group of the content of information that management:**

**(a) proposed to communicate with the GWC**

During my tenure as a Director of Burswood Limited it has been customary for Mr Bossi to communicate with the GWC. Mr Bossi provides an update on any substantive matters to the Burswood Limited Board as part of his board report. However, Burswood Limited Board meetings are not held monthly.

**(b) had communicated to the GWC**

During my tenure on the Board of Burswood Limited, Mr Bossi has informed the Board of communications that he has had with GWC. The Board was informed of the communications in both Board meetings and in board packs. The information provided to the Board about communications between the GWC did not include specific detail.

I am not aware of the information provided to the Board of Burswood Nominees or any other entity within the Crown Group.

- 60. Whether, how and/or to what extent management of the Perth Casino operations was given direction or guidance from the board of either Burswood Limited,**

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<sup>2</sup> In this schedule, "Department" means the Department of Local Government, Sport and Cultural Industries and its predecessors including the Department of Racing, Gaming and Liquor, and the Office of Racing, Gaming and Liquor

**Burswood Nominees Limited or any other entity within the Crown Group about when and how to communicate with the GWC or the Department about the subject matter of any of the allegations identified in paragraph 14 of Chapter 3.1 of the Bergin Report**

I am not aware of any direction or guidance given to the management of the Perth Casino operations from the Board of Burswood Limited about communications with the GWC or the Department about the allegations identified in paragraph 14 of Chapter 3.1 of the Bergin Report.

- 61. In respect of the subject matter of each of the allegations identified in paragraph 14 of Chapter 3.1 of the Bergin Report whether, how and/or to what extent management of the Perth Casino operations informed the board of either Burswood Limited, Burswood Nominees Limited or any other entity within the Crown Group of the content of information that management:**

**(a) proposed to communicate to the GWC**

**(b) had communicated to the GWC**

I am not aware of any information provided by management of the Perth Casino operations to the Boards of Burswood Limited, Burswood Nominees or any other entity within the Crown Group about allegations identified in paragraph 14 of Chapter 3.1 of the Bergin Report.

Ms Coonan did give a brief verbal update in the April 2021 Burswood Limited Board meeting that progress had been made on the terms of a remediation plan. The remediation plan was noted in the 17 June 2021 Burswood Limited Board meeting.

- 62. Your knowledge of any gifts or benefits, including hospitality, provided by the Crown Group, including by its officers or employees, to officers and employees of the Department, and members of the GWC**

I am not aware of any gifts or benefits provided by the Crown Group, including by its officers or employees, to officers and employees of the Department or members of the GWC.

- 63. Your knowledge of any personal relationships and friendships between employees and officers of the Crown Group on the one hand and employees and officers of the Department, or members of the GWC, on the other. Please specify when, to your knowledge, those personal relationships and friendships began and when you first became aware of them**

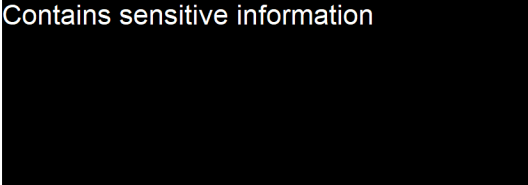
On or about 15 February 2021, I became aware through an article published in the West Australian of a social relationship between Mr Michael Connolly, former Chief Casino Officer and Paul Hulme, Manager of Gaming and Regulatory Compliance and Claude Marais, General Manager of Legal and Compliance.

Prior to the publication of this article, I was not aware of any personal relationships or friendships between employees and officers of the Crown Group and employees and officers of the Department or members of the GWC.

**64. The nature and content of Burswood Nominees Limited's systems, policies and/or procedures regarding integrity issued, including conflicts of interest, relevant to interactions with the GWC, including with individual GWC members, and/or the Department, including individual officers and employees**

The nature and content of Burswood Nominees' systems, policies and/or procedures regarding integrity issued (sic.), including conflicts of interest, relevant to interactions with the GWC, including with individual GWC members, and/or the Department, including individual officers and employees are contained within the Crown Code of Conduct (FEW.0001.0001.0296).

Contains sensitive information



Signed:

Date: 3 August 2021