

# PERTH CASINO ROYAL COMMISSION

## AMENDED WITNESS STATEMENT OF MICHAEL JAMES NEILSON

I, MICHAEL JAMES NEILSON, of Contains sensitive information solicitor, say as follows:

### Preliminary matters

1. This witness statement is provided in response to a request from the Perth Casino Royal Commission dated 9 September 2021 that I provide a written statement, and the 'List of Topics' attached to that request.
2. In providing this witness statement, I am not authorised, nor do I intend either expressly or impliedly, to waive legal professional privilege attaching to communications of any entity in the Crown Group of Companies including the Burswood Entities.
3. Further, my employment with the Crown Group ended in November 2017. Consequently, my recollection of the detail of matters covered by this witness statement has faded over time.

### General

*Topics identified in list of topics to be addressed in a written witness statement by Michael Neilson (Topics) -*

1. *The period of your employment within the Crown Group, the positions you held and which company within the Crown Group was your employer with respect to each position.*
2. *The job description and responsibilities of each position you held within the Crown Group and the lines of reporting in respect of each position.*
3. *Your qualifications, expertise and experience at the time you were first employed within the Crown Group, including whether you had any related specifically to casino operations.*
4. *The induction and/or ongoing training you were given during your employment within the Crown Group.*

4. My employment with the Crown Group commenced in July 2004 and ended in November 2017.
5. Over this period, I held the following roles (identifying in some instances my line of direct report and the relevant Crown Group entity).
  - (a) From in or about July 2004 until December 2007 – General Counsel, Crown Melbourne Limited (**Crown Melbourne**).

Initially I reported to Mr David Courtney, the Chief Financial Officer (**CFO**) of Crown Melbourne. However, shortly after I joined, Mr Courtney was appointed Chief Executive Officer (**CEO**) of Burswood Limited (**Crown Perth**) and I then reported to Mr Rowen Craigie, CEO of Crown Melbourne.

- (b) From in or about late 2004 until 30 June 2017 – Joint Company Secretary of Crown Melbourne.
  - (c) From in or about December 2007 to 30 June 2017 – General Counsel and Company Secretary of Crown Resorts Limited (**Crown Resorts**). I note that:
    - (i) In December 2007, Publishing and Broadcasting Limited (**PBL**) demerged its gaming and media businesses. Crown Resorts was the newly formed and newly listed company which became the parent company of PBL's gaming assets, including Crown Melbourne and Crown Perth.
    - (ii) I continued to report to Mr Craigie in his capacity as CEO of Crown Resorts. Mr Craigie left Crown Resorts in February 2017 and I thereafter reported to Mr John Alexander, Executive Chairman of Crown Resorts, from late February 2017 until I left Crown.
  - (d) On 30 June 2017 – I stepped down from my role as General Counsel and Company Secretary of Crown Resorts, and all other associated appointments of all other boards and committees in the Crown Group.
  - (e) On 1 November 2017 – I left the Crown Group.
6. I do not recall ever having a formal job description while at Crown Melbourne or Crown Resorts.

### ***Qualifications***

- 7. I have a Bachelor of Laws and Bachelor of Arts from the University of Melbourne.
- 8. Prior to joining the Crown Group, I had worked for 10 years in the commercial law department of a second-tier law firm in Melbourne and I subsequently worked as an inhouse lawyer for seven years at the Lend Lease Group in Sydney, including in the role for over five years as General Counsel and Company Secretary for General Property Trust, an ASX listed property trust which, at that time, was managed by Lend Lease.
- 9. Prior to joining Crown Melbourne in 2004, I had no experience of gaming operations or of working for a casino.

***Induction***

10. When I joined Crown Melbourne, I went through the standard employee induction program at that time. I cannot remember its content in any detail.

***Role as General Counsel***

11. As General Counsel of Crown Melbourne (between July 2004 and December 2007), I was responsible for:
  - (a) the Inhouse Legal team, consisting of two lawyers, two clerks (one of whom subsequently became a lawyer) and two assistants. This team provided legal advice to the business, including in relation to State gaming laws; and
  - (b) the Compliance team, consisting of the Compliance Manager and (to the best of my recollection) four other people. This team was responsible for compliance with the State gaming laws, including employee licensing and reporting to the gaming regulator.
12. During the time I was General Counsel of Crown Melbourne, I and other Crown Melbourne executives, including the Crown Melbourne CEO, also assisted PBL with its acquisitions of other gaming assets, including the establishment of a joint venture in Macau. I assisted PBL with its applications for gaming licences and approvals in Macau.
13. When I moved to Crown Resorts in December 2007 as General Counsel, I was responsible for Crown Resorts' Inhouse Legal team, which at that time comprised two lawyers and a clerk.
14. In summary, my team and I provided legal advice to Crown Resorts senior management on a wide range of matters and managed the legal aspects of corporate activities, including acquisitions, divestments, joint ventures, financing, capital raising and litigation. We also managed the gaming licensing requirements of Crown Resorts, including obtaining necessary approvals in Macau, the UK, Nevada, Pennsylvania, British Columbia, Alberta and New South Wales. We also provided assistance to the Crown Melbourne and Crown Perth legal teams when they needed information about Crown Resorts as part of their Victorian and West Australian licences, and I sometimes communicated directly with the Victorian and West Australian gaming regulators in this regard.
15. At the time I moved from Crown Melbourne to Crown Resorts in December 2007:
  - (a) Crown Melbourne appointed a new General Counsel to manage its Inhouse Legal team; and
  - (b) Crown Perth had its own General Counsel and inhouse legal teams, which it retained.

Each of those General Counsel reported to their respective CEOs and were responsible for the types of things I had been responsible for when I was General Counsel at Crown Melbourne, including advising on State gaming laws.

***Role as Company Secretary***

16. To the best of my recollection, prior to 2007, as joint Company Secretary of Crown Melbourne, I attended board meetings of Crown Melbourne and meetings of the Audit and Risk Committee and the Compliance Committee, which were sub-committees of the Crown Melbourne Board. I cannot recall whether I was responsible for the collation and distribution of board papers and the taking of minutes, or whether this was undertaken by the other joint Company Secretary of Crown Melbourne who to the best of my recollection was the then PBL joint Company Secretary.

17. From 2007, I was joint Company Secretary of:

- (a) Crown Resorts;
- (b) Crown Perth; and
- (c) Crown Melbourne.

I discuss these in detail below.

18. I was also Company Secretary of:

- (a) a number of other wholly owned, 'non-operational' subsidiaries within the Crown Group, some of which I was also a director of;
- (b) from in or about 2015, CrownBet, a joint venture company in which Crown Resorts acquired a majority stake and which offered sports betting; and
- (c) Betfair Australia, although I am uncertain about this, as I do not recall attending Betfair board meetings or being involved with collation or distribution of papers.

**Crown Group Boards**

*Topics -*

5. *Describe your role and responsibilities as company secretary of any of the companies in the Crown Group.*
6. *Provide details of any advice provided to a board or a board committee of the Burswood Entities or the Crown Group about governance issues or matters.*
7. *Provide details of the process and contents of induction and ongoing training and professional development of directors of the Burswood Entities or the Crown Group.*

19. As noted above, from 2007, I was the joint Company Secretary of:
- (a) Crown Resorts;
  - (b) Crown Perth; and
  - (c) Crown Melbourne.
20. My responsibilities in respect of each of these differed. Fundamentally, I was primarily responsible for company secretarial functions for Crown Resorts, while the other joint Company Secretary for Crown Perth and Crown Melbourne took on the main company secretarial responsibility for those entities.

***Crown Perth – Board and Committees***

21. During my time as Crown Resorts Company Secretary, to the best of my recollection, at different times Mr Alan MacGregor, Mr Craig Spence and Mr Josh Preston, were the joint Company Secretary for Crown Perth. I do not recall the dates or time periods of their respective appointments. Each of them took primary lead when they were the joint Company Secretary for Crown Perth.
22. I was not invited to and to the best of my recollection I did not attend any Crown Perth board meetings. I note that I lived in Melbourne and the meetings were held in Perth.
23. My role as joint Company Secretary of Crown Perth was limited primarily to:
- (a) assisting with distribution of papers to the Crown Perth Board;
  - (b) Undertaking ‘back-end work’ such as ASIC filing, maintaining the corporate register, arranging for company documents to be signed;
  - (c) managing meeting dates and times as it was more convenient for me to do so as I was abreast of available dates for directors (in my role with Crown Resorts); and
  - (d) occasionally consulting on agenda items for the next board meeting.
24. I did not do any work assisting with the functioning of the board and its meetings or preparing agendas.
25. To the best of my recollection, Crown Perth had no board committees.

***Crown Melbourne – Board and Committees***

26. Ms Deb Tegoni was the joint Company Secretary for Crown Melbourne. She took primary lead.

27. My role as joint Company Secretary for Crown Melbourne was similar to my role as joint Company Secretary for Crown Perth. However, being located in Melbourne, I was invited to attend the meetings and I generally did so.
28. I generally attended the Crown Melbourne Compliance Committee meetings, but I generally did not attend Crown Melbourne Audit and Risk Committee meetings.

***Crown Resorts – Board and Committees***

29. To the best of my recollection Crown Resorts had the following committees:
  - (a) Audit Committee;
  - (b) Risk Management Committee;
  - (c) Occupational Health and Safety Committee;
  - (d) Nomination and Remuneration Committee;
  - (e) Responsible Gaming Committee;
  - (f) Corporate Social Responsibility Committee;
  - (g) Investment Committee; and
  - (h) Finance Committee.
30. With assistance from Ms Mary Manos, who was joint Company Secretary with me, I carried out the company secretary function for Crown Resorts. In summary, I was responsible for:
  - (a) organising the date and venue for the board and committee meetings;
  - (b) issuing the agenda, after consultation with the CEO, CFO and Head of Development;
  - (c) collating and distributing board and committee papers;
  - (d) taking the minutes at board and committee meetings; and
  - (e) ensuring compliance with the ASX Listing Rules and the *Corporations Act 2001* (**Corporations Act**), including appropriate filings and disclosures with ASX and ASIC, the preparation and dispatch of the Annual Report and the calling and conduct of the Annual General Meeting.
31. I explain my role and responsibilities in more detail with reference to the Crown Resorts Limited Board Charter (**Charter**), which, to my recollection, was adopted in accordance with the recommendations of the ASX principles of good corporate governance. Crown Resorts

adopted the Charter believing it was the best practice to do so and it delineated the responsibilities of board and of management.

32. Clause 4 of the Charter sets out the role of the company secretary as including the following:

- (a) advising the board and its committees on governance matters;
- (b) monitoring that board and committee policy and procedures are followed;
- (c) coordinating the timely completion and despatch of board and committee papers;
- (d) ensuring that the business at board and committee meetings is accurately captured in the minutes; and
- (e) helping to organise and facilitate the induction and professional development of directors.

I deal with each of these identified responsibilities below.

*Advising the board and committee on governance matters*

- 33. Part of my role was to advise on board governance and issues associated with the management and running of the board. My focus was to ensure that the board was properly and adequately informed, and to facilitate the smooth running of the board. If the board decided that it required information to enable it to make a decision, it was my role to ensure that information was provided. I was not a decision maker and I could not vote on board decisions.
- 34. If there were issues that arose which I felt were of significance or were attended by sufficient uncertainty, I was authorised to, and did on occasion, seek external legal advice.
- 35. It was rare that I was required to provide formal legal advice. It was more often ‘on the run’, ‘how should we do this’ type questions, for example, questions about disclosure, listing rules and the Corporations Act.
- 36. If there were potential conflicts of interest or if I needed legal advice on related party transactions, for example, I would usually seek external help. I had the authority and was encouraged to seek external help in such circumstances.

*Monitoring board and committee policy and procedures*

- 37. In addition to the Charter, each committee had its own charter. I do not recall any other formal policies or procedures for the board and committees.
- 38. Committee charters were approved by the board when the committee was formed. It would set out what a committee’s role and functions were, procedures for meetings including

membership, chair, quorum and number of meetings per year. Committee charters were regularly reviewed.

*Co-ordinating despatch of board and committee papers*

39. As the board and committee meetings for the Crown Group were set a year in advance it was not uncommon for a meeting date to be moved around to suit attendees' schedules.
40. Generally, Crown Resorts board and committee meetings were held in Melbourne. Board meetings were usually scheduled for a half-day starting at around 10:00am. This was to allow attendees time to make their way from the airport if they flew in in the morning.
41. Sometimes we had meetings in Perth and occasionally we met in Sydney and Macau.
42. Directors and other attendees were able to attend via teleconference if they were unable to be physically present.
43. The Crown Resorts Board had six scheduled board meetings each year. However, if special or urgent items of business were required to be considered, ad hoc additional board meetings would be organised.
44. Prior to each of the regularly scheduled board meetings, I would speak with the CEO about what the meeting agenda would look like, create a draft agenda, circulate that draft to the Crown Resorts CEO, CFO and Head of Development.
45. Regular agenda items that would usually be included were the minutes of the last board meeting, action items arising from the last board meeting, the CEO report, management accounts, minutes of any committee meetings, development reports and any additional items.
46. The Half Year and Full Year Accounts would be considered at the February and August meetings each year and the annual budget would usually be considered at the June meeting.
47. Additional items may have included things such as acquisitions and investments.
48. Earlier in my tenure as Crown Resorts Company Secretary, board papers would be sent by courier in hard copy (often with emailed copies sent in advance – to give directors more time to read the papers). Later (I don't remember exactly when), we used an online portal which allowed us to upload the documents to a secure database for the meeting attendees to access.
49. In addition to me, the executives normally present at Crown Resorts board meetings included the Crown Resorts CEO (who was managing director and a member of the Board), Crown Resorts CFO, CEO of Crown Melbourne and CEO of Crown Perth and Crown Resorts' Head of Development.

50. We would also sometimes have external people, such as investment bankers, lawyers and other advisors, or more junior managers who attended from time to time to speak to an agenda item. They would normally wait outside the meeting room until I called on them to present their particular agenda item.

*Ensuring business at board and committee meetings is accurately captured in minutes*

51. To the best of my recollection, my practice for capturing minutes during board meetings was as follows:
- (a) I would have a hard copy of the board papers and an additional notepad.
  - (b) I would take notes on my board papers and the notepad.
  - (c) I would prepare the minutes from my notes within the week as I did not want to leave them for too long.
  - (d) The form of the minutes generally consisted of action items, decisions made, the identity of the presenter, key points made, key questions and discussions.
  - (e) Once a version of the minutes was drafted I would show it to the Crown Resorts CEO, who may provide comments or amendments.
  - (f) I would finalise the minutes and circulate them with the board pack for the next board meeting.
  - (g) Directors would be invited to comment on the minutes at the next meeting however it was rare to receive comments. If there was feedback, it usually would be on something minor such as typos.
  - (h) I would normally keep my hard copy board papers with notes for up to 12 months.
52. I also recall that later in my tenure as Crown Resorts company secretary, the Crown Resorts CFO would usually prepare and use a Powerpoint presentation, which was projected on a screen, to assist with presenting the financial results and key issues.

*Helping organise and facilitate induction and professional development of directors*

53. I do not recall any formal ongoing education/development program for directors.
54. I cannot recall any new independent directors being appointed to Crown Melbourne or Crown Perth Boards in my time as Crown Resort Company Secretary. My recollection is that all new appointments to these Boards were either existing Crown Resorts directors or Crown Group senior executives.

55. The Crown Resorts Board had power to appoint new directors, but directors would have to submit themselves for re-election to shareholders at the next AGM. The nomination of a new director would be put to the Nomination and Remuneration Committee. The Committee may then recommend the appointment to the Board. One of the issues for consideration by the Nomination and Remuneration Committee and the Board was the nominated director's independence, which was determined by the Board, having considered the ASX principles of good corporate governance.
56. The person's background and experience were definitely relevant, but I do not recall any new director in my time having direct experience in the gaming industry.
57. To the best of my memory, for new Crown Resorts independent directors, the induction process comprised of discussions with the Crown Resorts CEO and then me. Ms Manos would then arrange for a pack of documentation to be sent to the new director. I cannot recall all the contents of the pack, but I think it included the director's engagement letter, a declaration to be completed by the incoming director about any Crown Resorts shares owned and an undertaking to advise Crown Resorts if they acquired any shares, copies of the Constitution, Board and Committee Charters, key policies and the latest Annual Report. New directors would also be given a copy of the most recent board pack. Usually, new directors would be given the opportunity to meet with senior executives and given tours of the Melbourne and Perth properties.
58. Ms Manos or I would also organise other formalities such as asking for bank account details and tax file number.
59. Assistance and meetings with people were offered but to the best of my recollection there was no formal program of professional development.
60. If there were material changes in relevant legislation and regulations, information would usually be provided to the board in the board packs and I would sometimes do a presentation at a board meeting.
61. All new Crown Resorts directors required approval from gaming regulators, including the Victorian, West Australian and New South Wales gaming regulators. That approval process took several months. Pending that approval, the new director would receive board papers and other board communications and attend meetings, but only in an observer capacity. They could not vote.
62. I would assist new directors to complete the necessary applications for approval from various gaming regulators, including the Victorian, West Australian and New South Wales gaming regulators. I would liaise with the General Counsels or Compliance Managers of Crown Melbourne and Crown Perth to ensure I understood what information was required and to

obtain the correct forms from their respective state gaming regulators. On occasions, I accompanied new directors to interviews if required.

### ***Crown Resorts - Committees***

63. For Crown Resorts Committees, Ms Manos and I shared the various responsibilities, although I was ultimately responsible. We both attended all committee meetings, one of us would take the lead in collating committee papers and one of us would take the minutes. From memory, Ms Manos was more active with the Audit Committee, the Risk Management Committee, the Occupational Health and Safety Committee and the Corporate Social Responsibility Committee. I was more active with the Responsible Gaming Committee and the Nomination and Remuneration Committee.

### ***Non-operational subsidiaries***

64. Ms Manos managed most of the company secretarial requirements for the non-operational subsidiaries.
65. The group operated as a 'consolidated group' for tax and accounting purposes, so the non-operational subsidiaries' boards only met when formal decisions needed to be made, for example, where providing a guarantee to support the group's financing arrangements. These meetings would often be by telephone or by circular resolution.
66. Mary Manos and I managed all ASIC and ASX filings for all companies and kept all the company registers. Our clerk assisted in this function.

### **Risk Management Processes**

#### ***Topics -***

8. *Describe any risk appetite which was adopted by or applied to any of the Burswood Entities and the Crown Group with respect to the following risks associated with the operation of the Perth Casino:*
- (a) AML/CTF risk management;*
  - (b) responsible service of gaming;*
  - (c) junket operations; or*
  - (d) vulnerability of casinos to criminal infiltration,*
- and if and how that risk appetite changed during the period of your employment.*
9. *Describe the strategies, frameworks, plans and/or processes that were adopted or applied during the period of your employment in respect of any of the Burswood Entities and the Crown Group to identify and manage material business risks associated with the operation of the Perth Casino.*
10. *Identify any changes made to such strategies, frameworks, plans and/or processes during the period of your employment.*

11. *Describe any external advice, review or input the Burswood Entities and the Crown Group obtained into such strategies, frameworks, plans and/or processes.*
12. *Describe how the Burswood Entities and the Crown Group implemented such strategies, frameworks, plans and/or processes.*
13. *Describe how the Burswood Entities and the Crown Group assessed or monitored compliance with such strategies, frameworks, plans and/or processes.*
14. *Describe how the Burswood Entities and the Crown Group assessed, reviewed or monitored the effectiveness of such strategies, frameworks, plans and/or processes.*
15. *Describe how the Burswood Entities and the Crown Group compiled and reviewed any risk registers, and which personnel, committee, groups or bodies compiled and reviewed the risk registers.*
16. *Describe the roles and responsibilities of the Risk Management Committee during the period of your employment. Including specifying how the Risk Management Committee reported to any of the boards of the Crown Group and how feedback was received from the boards and, where appropriate, implemented.*
17. *Describe your role in:*
  - (a) *reporting to the Risk Management Committee; and*
  - (b) *preparing, compiling, reviewing and monitoring any risk registers.*

67. I do not recall the Crown Resorts, Crown Melbourne or Crown Perth Boards ever adopting formal risk tolerance or risk appetite statements regarding any of the risks on their risk registers. In my experience, the adoption of formal risk tolerances or risk appetites is a relatively recent risk management practice.
68. At the time of the PBL demerger in late 2007, both Crown Melbourne and Crown Perth had dedicated Risk Managers and Internal Auditors and risk management processes for identifying, assessing and monitoring key risks. I understood those processes included the regular convening by the Risk Manager of a meeting of representatives of each main department within the business to review the risks on the risk register and, where appropriate, update the risk description, mitigations, including any controls, and/or risk rating using a consequence and likelihood scale. The group would also consider whether there were any new risks which were not already on the risk register. A summary of these updates would then be provided to the relevant board or committee of the board. When I was General Counsel at Crown Melbourne, I participated in that process.
69. After Crown Resorts became the parent company, my recollection is that it was decided that these internal processes at Crown Melbourne and Crown Perth should continue and that a similar process should be adopted at the parent company, i.e. a regular meeting of key managers to identify, assess and monitor risk.

70. Crown Resorts did not have a dedicated Risk Manager, so my team was responsible for managing that risk management process.
71. To the best of my recollection, twice per year (generally in May and November), Ms Manos would seek an update from the Crown Melbourne and Crown Perth Risk Managers as to their risk registers. She would also convene a meeting of relevant Crown Resorts managers (CFO, Financial Controller, Head of Development and myself) to review Crown Resorts' risks. I would seek an update of risks from Melco Crown Entertainment and feed it into the process. I believe that we also obtained information from other wholly and partly owned subsidiaries, e.g. Aspinalls and CrownBet, although I cannot recall how this was obtained, and Ms Manos, with assistance from the Crown Melbourne and Crown Perth Risk Managers, would produce a table or matrix updating the risk profile for Crown Resorts, including risks from Crown Melbourne, Crown Perth, Melco Crown Entertainment and other subsidiaries. She would submit it to me to check and make comments and then I would submit it to the Crown Resorts CEO and he would make comments. This table or matrix would then be submitted to the Crown Resorts Risk Management Committee as part of the committee papers and it would be reviewed and discussed in the twice-yearly committee meetings.
72. My memory is that this table/matrix included the risk description, any controls or risk mitigations, consequence and likelihood ratings, overall risk rating and risk owner.
73. As I recall, each risk had an owner (person or team responsible), and it was that person or team that was responsible for identifying, implementing, and managing any controls or mitigating strategies that were in place to manage the risk.
74. My memory is that the attendees, other than committee members, at Risk Management Committee meetings were Crown Resorts CFO, myself, Ms Manos, Crown Melbourne CFO, Crown Melbourne General Counsel, Crown Melbourne Risk and Internal Audit Manager, Crown Perth CFO, Crown Perth General Counsel and Crown Perth Risk Manager. I note that the Crown Resorts CEO was a member of the Risk Management Committee and so was also usually in attendance.
75. The minutes of the Risk Management Committee meetings were provided to the Crown Resorts Board at the next board meeting, and the Chair of the Risk Management Committee (during my time that was Mr Geoff Dixon) would provide any additional comments at the board meeting.
76. Risk registers of Crown Resorts, Crown Melbourne and Crown Perth were constantly being updated and changing. My memory is that the process outlined above was largely unchanged through my time at Crown Resorts. I don't recall whether there was any external review of the overall process, although copies of the Risk Management Committee papers and minutes were

regularly provided to the external auditors (EY) and the Victorian gaming regulator. I don't recall whether they were provided to the WA gaming regulator. They were also provided to other gaming regulators when requested, e.g. Nevada.

77. Around 2013 or 2014 (I am not certain of the year), Mr Craigie (Crown Resorts CEO) asked Mr Ken Barton (Crown Resorts CFO) and I to regularly review the Crown Perth Audit and Risk processes. As a result, at least twice per year, Mr Barton and I would meet with the Crown Perth CFO, Crown Perth General Counsel and the Crown Perth Risk Manager and Internal Auditor and review their internal Audit and Risk Papers, that had been the subject of the Crown Perth Internal Audit and Risk Committee meeting. These papers covered internal audit, updates to the Crown Perth Risk Management Plan and Risk Register, litigation matters, gaming compliance, AML and other topics. Following our meeting, I would report any material issues to Mr Craigie, in advance of Crown Perth board meetings.

### Corporate Culture

*Topics -*

18. *Your knowledge, understanding and impression of the culture at the Crown Group and the Burswood Entities during the period of your employment, including specifying your knowledge, understanding and impression of whether there was a compliance culture at the Crown Group and the Burswood Entities.*
19. *Were any surveys of employees of the Crown Group and the Burswood Entities in relation to culture conducted during your employment? If so, what was your role and involvement in those surveys? and what were the outcomes of those surveys and were any changes made in response to those surveys?*

78. In my experience, culture is a difficult thing to identify and define.
79. My impression of the culture at Crown Resorts when I was there was that it was a high-performance culture. There were a number of elements to that culture, including high levels of customer service, high quality product offerings, high levels of financial performance, agility in undertaking transactions and corporate activity, maintaining good relationships with all levels of government and with gaming and other regulators and good regulatory compliance, especially around gaming laws.
80. It is more difficult for me to comment on any specific cultures at Crown Melbourne and Crown Perth as I had not been part of the Crown Melbourne management team since 2007 and had never been part of the Crown Perth management team.

81. I do not recall any employment surveys in relation to culture. It is possible that Crown Melbourne and/or Crown Perth management did carry out such surveys, but I do not recall being involved or seeing the results.

Date: ~~17~~ 28 September 2021

Contains sensitive information

Signed

**Michael James Neilson**