



## **MODERN SLAVERY STATEMENT FROM THE MANAGING DIRECTOR**

Slavery and human trafficking remain to be some of the most abhorrent crimes in modern day society that continue to impact people from all over the world. Crown Aspinalls is in full support of the UK Government's commitment to eradicate these crimes, to mitigate and identify risks, to support the victims and to prosecute perpetrators within the full extent of the law. It is everyone's responsibility to be alert to the risks, however small. In demonstration of this support and as a socially responsible corporate citizen, Crown Aspinalls has implemented a number of mitigating measures to identify and report suspicions of modern slavery, particularly in contracted services where the risk of modern slavery may be greater. Ultimately, in application of this policy, the expectation is that all Crown Aspinalls staff report their concerns, which are followed up and acted upon as appropriate.

This statement is made pursuant to section 54(1) of the *Modern Slavery Act 2015* and constitutes Crown Aspinalls' Modern Slavery statement for the current financial year.

### **ORGANISATION'S STRUCTURE**

Crown Aspinalls is a high end Mayfair casino incorporating bar and restaurant facilities. Crown Aspinalls forms part of the global Crown Resorts Limited group.

### **OUR BUSINESS**

Crown Aspinalls' business is that of providing a high end gaming experience and environment to VIP's, who expect the highest of standards of service.

### **OUR SUPPLY CHAINS**

Crown Aspinalls' supply chains predominately relate to the sourcing of goods relating to the provision of food, drink, gaming and cash products and that of services engaged with respect to casual staffing via third party companies including contracted staff.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Crown Aspinalls has developed and implemented an Anti-Slavery and Human Trafficking Policy which reflects its commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the business and supply chains.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

To further support Crown Aspinalls' initiative to identify and mitigate potential risk, Crown Aspinalls:

- Operates a licensed premise which is effectively managed in order to ensure optimum control of the work environment;
- Where possible, builds long standing relationships with local suppliers and makes clear by association with Crown Aspinalls, the expectations of high ethical and proper business behaviour;



- Where possible, will engage with a UK company or branch whereby the expectation is that these entities similarly take a strong stance against slavery and human trafficking and conduct appropriate due diligence to ensure that these activities are not occurring within their business; and
- Encourage the reporting of concerns and the protection of whistle blowers in accordance with the Crown Resorts' Whistle Blowers Policy.

#### **SUPPLIER ADHERENCE TO OUR VALUES**

Crown Aspinalls has a zero tolerance to slavery and human trafficking and accordingly, expects all suppliers and contractors engaged by the business to comply with these values.

#### **AWARENESS**

To ensure a high level of understanding of the risks of modern slavery and human trafficking, Crown Aspinalls promotes awareness to relevant members of staff, suppliers, contractors and the Crown Aspinalls Board of Directors and is committed to developing appropriate levels of training to support this objective.

#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Crown Aspinalls uses the following key performance indicators to monitor the effectiveness of mitigating slavery and human trafficking taking place in any part of the business or supply chains:

- Completion of internal audits (including but not limited to reporting and follow up actions);
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, Crown Aspinalls' expectations.