

CLASS ACTION SUMMARY STATEMENT

1. What is a class action?

Where seven or more people have claims that arise out of similar circumstances (such as in this case), a class action can be brought by one lead plaintiff on their own behalf and as a representative of others. The class action will resolve the common issues of fact or law for the class through the vehicle of the lead plaintiff's case. This is an efficient way for the Court to determine the common issues that apply to claims involving large numbers of people.

2. Who is the Crown Resorts II Class Action against, and what is the claim for?

The claim is against Crown Resorts Limited (**Crown**). The claim alleges that Crown made misleading representations about its systems and processes for compliance with anti-money laundering obligations including as those systems relate to Crown's VIP international gambling business and Crown's dealings with overseas junkets; that it failed to disclose relevant information it had about those matters to the market, including the risk of regulatory action by the money-laundering regulator AUSTRAC and the consequences of such regulatory action; and that it engaged in conduct that was contrary to the interests of the members of Crown as a whole.

3. Who is a group member in the Crown Resorts II Class Action ?

There are two types of group members in the Crown Resorts II Class Action:

- (a) persons who acquired shares in Crown in the period from 11 December 2014 to 18 October 2020 (**Acquiring Shareholders**); and
- (b) persons who already had shares in Crown before 11 December 2014 and held those shares until at least 18 October 2020 (**Holding Shareholders**).

A complete definition of group members is available in paragraph 1 of the Writ.

4. What is the role and responsibility of the lead plaintiff?

The role of the lead plaintiff is to be the representative for the class. They will give instructions to Maurice Blackburn regarding the conduct of the case and may give evidence during the proceeding. In hearing the lead plaintiff's case, the Court will be asked to make findings in relation to questions of fact and/or law that are common to all group members. In this case the lead plaintiff is Greg Lieberman.

5. Who is the law firm acting for the lead plaintiff?

Maurice Blackburn.

6. How is the Crown Resorts II Class Action funded?

Maurice Blackburn is conducting the Crown Resorts II Class Action on a 'no win no fee' basis.

This means that all costs in the proceeding will be borne by Maurice Blackburn, and group members are not liable to pay anything unless and until there is a successful outcome such as settlement or an award of damages in favour of the plaintiff and group members. In the event of a successful outcome, any costs payable to Maurice Blackburn will be deducted from, and will not exceed, any compensation that group members receive. All such costs are required to be considered and approved by the Court.

There is no third party litigation funder involved in the case. This means that group members will not be required to pay a funder's fee or commission.

7. How are legal fees and disbursements charged?

If there is a successful outcome, the lead plaintiff's legal costs will be charged in one of two ways:

- (a) calculated using time based billing for professional fees, with disbursements (for example, fees for experts and barristers) charged at cost; OR
- (b) the Court may make a "group costs order" which is an order that the lead plaintiff's lawyers are to be paid a percentage of the amount of any damages award or settlement. The percentage would be approved by the Court.

If there is a successful outcome, the liability for the lead plaintiff's legal fees and disbursements will be shared among the lead plaintiff and all group members.

8. Are there currently any other class actions against Crown?

There is separate investor class action against Crown (*Zantran Pty Ltd v Crown Resorts Limited* (Federal Court of Australia, VID1317/2017: **Zantran / Crown Resorts I Class Action**). It is brought by a different lead plaintiff and relates to different events, being disclosures to the market prior to the arrest of Crown staff in China in 2016. Maurice Blackburn is also acting in the *Zantran / Crown Resorts I Class Action*. It is currently listed for hearing in the Federal Court in late 2021.

If you are a group member in the *Zantran / Crown Resorts I Class Action*, you are likely also to be a group member in the *Crown Resorts II Class Action*. You can contact Maurice Blackburn to confirm your membership in either or both of those two class actions.

9. Who can group members contact for further information about the case?

Group members may contact Maurice Blackburn, at no out of pocket cost, via:

Email CrownAML@mauriceblackburn.com.au
Phone 1800 497 192
Post Crown Money Laundering Risk Class Action
 Maurice Blackburn
 PO Box 523
 Melbourne VIC 3001
Website <https://classaction.mauriceblackburn.com.au/CrownMoneyLaunderingRiskClassAction/>