

Submission on discussion document: *Publication of Directors' Residential Addresses on the Companies Register*

Your name and organisation

Name	Antony Steiner
Organisation	Langley Twigg

Please select if your submission contains confidential information:

I would like my submission (or specified parts of my submission) to be kept confidential, and attach my reasons for this for consideration by MBIE.

Responses to discussion document questions

1	Do you have any comments of our assessment of the options for approaching directors' residential addresses on the Companies Register?
	Yes
2	What is your preferred option?
	Keep addresses public
3	Are there interested parties who may have a legitimate reason to need to access directors' residential addresses? If so, who?
	We need them for AML purposes – otherwise getting proof of address is even more onerous a task. I refer you to the AML\CFT Act and regulations, plus guidance from the supervisor for the legal sector, DIA. Proof of address is mandatory for all beneficial owners
4	Is there a public interest in directors' residential addresses being provided to third parties such as journalists?
	No opinion
5	Under what circumstances should directors' residential addresses be released to an interested party?
	For compliance with the law – e.g. AML legislation
6	Do you agree that government departments and agencies should have automatic access to directors' residential addresses?

	Yes
7	Should this access be limited to the enforcement of law or are there other situations where it may be appropriate for government departments and agencies to have access to directors' residential addresses?
	Yes limited
8	Are there other factors which you think should be included in considering approaches to directors' residential addresses in historic documents?
	No opinion
9	Do you agree with our preferred approach to historic documents on the companies register?
	No opinion
10	Have you encountered situations where you consider that members of the public have abused this provision? If so, please provide details.
	No
11	Do you agree that shareholders' residential addresses should be treated the same way as directors' residential addresses (ie replaced with an address for service)?
	No! They should remain accessible for the reasons outlined above
12	Are there circumstances where third parties might have a legitimate interest in the residential address of a shareholder?
	Yes – same reason as above – to enable us to comply with the law
13	Do you think any changes need to be made to the residential address requirements for officers of other types of entities?
	No

Other comments

A change like this has unintended consequences. The state is asking law firms to be their ears and eyes on AML and yet are threatening to take away one practical way of our complying with the law.