

From: s 22

Sent: Wednesday, 21 January 2026 9:26 AM

To: s 22 @treasury.gov.au>; s 22 @asic.gov.au>;

s 22 @asic.gov.au>; s 22 @asic.gov.au>;

s 22 @asic.gov.au>

Subject: RE: Director residential addresses - urgent need for policy intervention [SEC=OFFICIAL]

Hi s 22

Thanks for sharing with ASIC. AICD also sent to the ASIC Chair and CEO yesterday.

I'll provide any update following the Commission meeting later this morning.

Kind regards,

s 22

Senior Executive Leader, Registry Operations

Australian Securities and Investments Commission

14-22 Grey Street, Traralgon Vic 3844

s 22

From: s 22 @treasury.gov.au>

Sent: Wednesday, 21 January 2026 8:57 AM

To: s 22 @asic.gov.au>; s 22 @asic.gov.au>;

s 22 @asic.gov.au>; s 22 @asic.gov.au>;

s 22 @asic.gov.au>

Subject: FW: Director residential addresses - urgent need for policy intervention [SEC=OFFICIAL]

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OFFICIAL

For your awareness.

OFFICIAL

From: s 22 [REDACTED]@aicd.com.au>
Sent: Tuesday, 20 January 2026 4:45 PM
To: s 22 [REDACTED]@treasury.gov.au>; s 22 [REDACTED]@TREASURY.GOV.AU>
Cc: s 22 [REDACTED]@aicd.com.au>
Subject: RE: Director residential addresses - urgent need for policy intervention [SEC=OFFICIAL]

Dear s 22 [REDACTED] and s 22 [REDACTED]

Further to s 22 [REDACTED] email from last week, we wanted to share some legal advice that we commissioned from s 22 [REDACTED], a leading corporate law expert, which walks through the relevant legal provisions.

The advice concludes that there is no legal obligation to include a director's residential address on the ASIC Companies Register. A change to remove such details would not, in her view, require any legislative amendment.

We would like to meet with you to discuss the advice and next steps – are you able to send through some times when you would be available?

Thanks and kind regards

s 22 [REDACTED]

s 22 [REDACTED]
Senior Policy Adviser
Education and Policy Leadership

AUSTRALIAN INSTITUTE of COMPANY DIRECTORS

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From: § 22 [redacted] <[redacted]@aicd.com.au>

Sent: Wednesday, 14 January 2026 1:21 PM

To: § 22 [redacted] <[redacted]@treasury.gov.au>; § 22 [redacted] <[redacted]@treasury.gov.au>

Cc: § 22 [redacted] <[redacted]@aicd.com.au>

Subject: Director residential addresses - urgent need for policy intervention

Importance: High

Hi § 22 [redacted] and § 22 [redacted]

I wanted to be clear on our position on the issue of residential addresses being publicly available on the ASIC Companies Register. Given discussions with members and government since our letter of 23 December to the minister, I wanted to set out how our perspective has evolved.

End state/medium term – we agree that the desired end state is as contemplated by Treasury– namely, that mid 2027 *at the latest*, we should be matching Director ID to the ASIC Companies Register (seeing the removal of all sensitive director personal information, and the substitution of service address details). We need to work to that goal ASAP, bringing forward all elements that are feasible.

Transitional state/short term – given the security environment post Bondi, and the long-standing and known risks of having 3 million individuals' personal information (incl residential address, DOB) on the publicly available Companies Register, we must take urgent, transitional measures to mitigate those risks. *The simplest, most effective solution is to move immediately to the following – ASIC removing all directors' residential addresses from the Companies Register, only releasing those details on application for legitimate purposes (eg lawyers, insolvency practitioners, financial institutions).*

This solution has four key benefits:

1. **Immediately** reduces the risk of physical or cyber attacks on 3 million people (including identity theft) – a position we understand is supported by Home Affairs
2. Does not require individuals to apply to ASIC seeking suppression of their details – many directors will not know they are under threat or that their home

address is publicly available – this applies to companies as well as the thousands of community organisations and charities incorporated under the Corps Act – if the government instead takes a position of creating a new suppression route for individuals who consider themselves at risk, this will require extensive communications, thereby increasing awareness (including from bad actors) of the fact that home addresses are publicly available (this risk is removed under our proposal)

3. Still allows relevant stakeholders (eg lawyers, insolvency practitioners) to access directors' residential addresses as needed via ASIC– based on engagement with senior lawyers and insolvency professionals, we understand it is very rare to require a home address for legal service
4. Brings Australia into line with other jurisdictions that do not require residential addresses – for example, the UK removed this requirement almost eight years ago. Detailed jurisdictional comparison attached again for visibility (previously shared with Treasury on 27 November).

I would be pleased to discuss further on the mobile below.

Thank you,

§ 22

§ 22

Head of Policy
Education and Policy Leadership

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From: § 22 @treasury.gov.au>

Sent: Wednesday, 7 January 2026 10:31 PM

To: § 22 @aicd.com.au>; § 22

§ 22 @TREASURY.GOV.AU>; § 22 @asic.gov.au;

s 22 [REDACTED]@asic.gov.au; s 22 [REDACTED]@asic.gov.au; s 22 [REDACTED]@asic.gov.au

Cc: s 22 [REDACTED]@aicd.com.au>

Subject: RE: Director personal information and Registry Project - AICD update to members and interim solution to privacy concerns [SEC=OFFICIAL]

OFFICIAL

Hi s 22 [REDACTED]

Thank you very much for passing this on. We appreciate being kept updated.

Thank you for your offer to speak about this. We will discuss and come back to you on it.

Regards

s 22 [REDACTED]

OFFICIAL

From: s 22 [REDACTED]@aicd.com.au>

Sent: Wednesday, 7 January 2026 12:06 PM

To: s 22 [REDACTED]@treasury.gov.au>; s 22 [REDACTED]

<s 22 [REDACTED]@TREASURY.GOV.AU>; s 22 [REDACTED]@asic.gov.au;

s 22 [REDACTED]@asic.gov.au; s 22 [REDACTED]@asic.gov.au; s 22 [REDACTED]@asic.gov.au

Cc: s 22 [REDACTED]@aicd.com.au>

Subject: Director personal information and Registry Project - AICD update to members and interim solution to privacy concerns

Dear all

We wanted to update you on a few actions from our end related to the Companies Registry project.

Member update

The AICD has just published an article (link [here](#)) advising our members about the Registry Project. The article will feature in the AICD's fortnightly newsletter (next edition 20 January) that aims to give directors relevant information about topical subjects that affect them.

The article highlights to members that their personal information is publicly available on the Companies Register, and provides members with information on how to seek to suppress their residential addresses from the Register (as outlined on ASIC's website). We wanted you to be aware of this, as it may result in additional

applications being made to suppress this information.

Urgent interim solution

As you are aware, the AICD is very supportive of the measures outlined in your [Background Paper](#) that go to removing directors' personal information from the Register. As you are also aware, the AICD considers July 2027 too great a delay given the current arrangements expose directors and officers to potential privacy, personal safety, and cyber and identity-theft risks. The AICD believes that it is imperative that these risks are addressed as soon as possible to protect the approximately 3 million company directors on the Register. **These serious privacy and security concerns are only increasing in the current environment, with certain parts of the community facing heightened risks.**

The AICD has raised these concerns across relevant portfolios and has proposed an interim solution - that the Government urgently allow the provision of a service addresses instead of a director's residential address on the Register. This would not undermine the planned Director ID linkage process and establishment of tiered access to personal details.

We would be happy to discuss any element of this proposal with you if you have any questions.

Yours sincerely,

§ 22

§ 22

Senior Policy Adviser
Education and Policy Leadership

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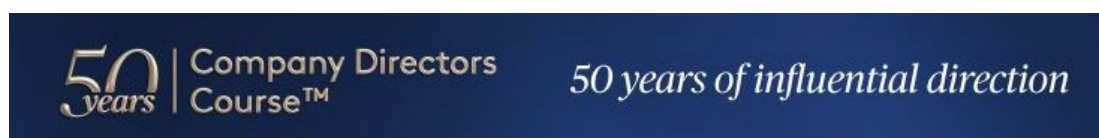
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