

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

## Your name and organisation

Name	Simon Fleisher
Organisation	Waipa Networks Limited

## 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?
	I support and agree with the methodology that has been used to compile the options.
2	What is your preferred option?
	Option 2
3	Are there interested parties who may have a legitimate reason to need to access directors' residential addresses? If so, who?
	No – the Director's role is about governance of the business and conducting their fiduciary responsibility. Where they live should not come into it, provided they satisfy the residency requirements (eg, New Zealand or Australia).
4	Is there a public interest in directors' residential addresses being provided to third parties such as journalists?
	No
5	Under what circumstances should directors' residential addresses be released to an interested party?
	None
6	Do you agree that government departments and agencies should have automatic access to directors' residential addresses?

	Yes, provided it is justifiable and proportionate
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?
	Limited to the enforcement of law or other closely related security requirements
8	Are there other factors which you think should be included in considering approaches to directors' residential addresses in historic documents?
	People are entitled to their privacy, and the policy that is adopted should be in keeping with this philosophy.
9	Do you agree with our preferred approach to historic documents on the companies register?
	No – this is a last approach. Option B is the right way to go, provided the costs can be covered.
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)?
	Yes
12	Are there circumstances where third parties might have a legitimate interest in the residential address of a shareholder?
	Potentially in the event of a liquidation or winding up scenario, but only if the service address is not available
13	Do you think any changes need to be made to the residential address requirements for officers of other types of entities?
	Potentially Incorporated Societies.

## Other comments

Thank-you for the opportunity to comment on this consultation – this is a very worthy initiative.