



12 October 2026

By email.

Dear Sir/Madam

Re: CP 391 Access to information on the companies register

AFMA welcomes the opportunity to provide comment on *CP 391 Access to information on the companies register* (the consultation).

AFMA is broadly supportive of the changes proposed in the consultation. Technological change has meant that additional protections to personal information are appropriate to reduce fraud risks such as identity theft, however, these need to be balanced with the proper public interest in who is behind companies.

We highlight some key themes from our membership below for your consideration.

Technological migration (questions 16, 19)

To minimise the transitional costs of the changes AFMA would support a migration program that provides sufficient opportunity for testing of system integrations and connectivity with the companies register well in advance of the 1 July 2027 roll out.

Know Your Client, Anti-Money Laundering and due diligence searches (questions 1-3, 17)

AFMA members have regulatory obligations to conduct searches for various regulatory reasons including those related to Know Your Client (KYC), Anti-Money Laundering (AML), and due diligence purposes. The reduction in available information around a company director's date of birth and address (suburb only) could impact the data points for these searches. AFMA seeks assurance that the director ID related information will be sufficient for these purposes.

Business access (questions 11-15)

We note the specific business users who will have 'Business access' listed on page 12 of the consultation being (1) registered liquidators (2) legal practitioners and (3) journalists and media organisations. We seek further information on how membership of particularly the latter group will be determined.

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Given the above requirements for regulatory related access for KYC, AML, and due diligence purposes we noted in response to questions one to three, we request ASIC consider a low-friction pathway for firms with Australian Financial Services licences or prudentially regulated firms to Business access.

Service addresses (question 1, 18)

AFMA seeks more information on the proposed rules for service addresses. Members anticipate using a single service address for all directors of a company. To reduce the migration burden to service addresses we request ASIC consider what automations it could provide via a bulk-update tool or portal to allow company secretaries to transition all board members simultaneously, rather than via manual, individual lodgements.

Default to residential address (question 5)

AFMA suggests consideration be given to defaulting to registered office addresses rather than residential addresses if a service address has not been lodged with ASIC by 1 August 2028, as better balancing the privacy risks and proper public interest.

Conclusion

We thank you for considering our comments in relation to the proposed reforms.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Damian Jeffree', is positioned above the typed name.

Damian Jeffree

Head of Financial Markets, Exchanges and Digital