

14 September 2021

Marketing Conduct Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600By email [businesscomms@treasury.gov.au](mailto:businesscomms@treasury.gov.au)

Our ref: J Denovan/41028096

**Submission on Treasury Laws Amendment (Measures for Consultation) Bill 2021: Use of technology for meetings and related amendments (Cth) exposure draft**

Dentons is pleased to have the opportunity to comment on the *Treasury Laws Amendment (Measures for Consultation) Bill 2021: Use of technology for meetings and related amendments (Cth)* exposure draft.

.We strongly support the initiatives in this bill to facilitate electronic execution of documents. Our extensive experience in this area has demonstrated to us that electronic execution reduces the risk of fraud and reduces costs and reworks.

It is important that the legislation leaves no doubt as to its effect. To that end we make the following comment.


Clause and Excerpt	Dentons Comment
<p>s110A (4)(a) Technology Neutral Signing</p> <p><i>'To avoid doubt, this section does not require:</i></p> <p><i>a person to sign the same form of the document as another person.'</i></p>	<p>The draft legislation does not define the meaning of 'same form of document' which leaves room for uncertainty.</p> <p>We submit that it would be clearer to say:</p> <p><i>(4) to avoid doubt, this section does not require:</i></p> <p><i>(a) a person to sign the same physical, digital, or other representation of a document as any other person so long as the operative sections of the versions contains the same text.</i></p>

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*Note: for example, one director may wet sign a paper document and the other director may sign an electronic representation of that document.*

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Yours sincerely

A handwritten signature in black ink, appearing to read 'Jon Denovan', with a long horizontal flourish extending to the right.

Jon Denovan  
**Special Counsel**  
Dentons Australia