



The Salvation Army Australia Territory

Territorial headquarters

2 Brisbane Avenue, Barton ACT 2600
PO Box 4224, Kingston ACT 2604

P 02 6270 3118

Director
Beneficial Ownership and Transparency Unit
Market Conduct Division
The Treasury
Langton Crescent
Parkes ACT 2600

Via email: beneficialownership@treasury.gov.au

The Salvation Army Australia submission to the Treasury consultation on Multinational tax integrity: Public Beneficial Ownership Register

Dear Beneficial Ownership and Transparency Unit

The Salvation Army Australia is pleased to submit a response to the Multinational tax integrity: Public Beneficial Ownership Register consultation Treasury is currently undertaking.

The Salvation Army Australia is an international Christian movement, united by faith and giving hope where it's needed most. Across Australia – in cities, country towns and rural communities – our work touches every demographic and age group. We're involved in national issues while also bringing hope to people who may be experiencing hardship or injustice.

The Salvation Army Australia notes the proposed measure will encompass ASIC regulated entities including unlisted public companies.

The Salvation Army Australia operates through several different legal entity types, including companies limited by guarantee (CLG). CLG entities are unlisted public companies.

The legal entities of The Salvation Army Australia (including the CLGs) are registered charities and regulated by the Australian Charities and Not-for-profits Commission (ACNC).

The consultation paper provides a short summary of the problem and need for Government action which is being addressed by the proposed public beneficial ownership register. The consultation paper does not identify any issue/s that are either directly or indirectly applicable to ACNC registered charities.

Founders **William & Catherine Booth**
General **Brian Peddle**

*Wherever there is hardship or injustice, Salvos will live, love and fight
alongside others to transform Australia one life at a time with the love of Jesus*

salvationarmy.org.au

Question 8 of the consultation paper states:

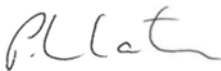
Should some entities, such as certain not-for-profit entities, have bespoke or limited beneficial ownership register requirements? If so, what types of entities, and what relief from the general disclosure requirements should be provided?

As the consultation paper does not establish or identify the existence of any issues relating to charitable entities, The Salvation Army Australia recommends any private or public register of beneficial ownership, as contemplated by the consultation paper, specifically excludes registered ACNC charities from any such obligations.

This will ensure registered charities operating with a CLG entity type are not subject to an unnecessary additional layer of regulatory compliance and cost.

Thank you again for the opportunity to comment. Please contact me at paul.hateley@salvationarmy.org.au or on [REDACTED] if you require additional information or would like to discuss further.

Yours sincerely,



Paul Hateley, Major
Head of Government Relations
The Salvation Army Australia

13 December 2022

The Salvation Army acknowledges the Traditional Owners of the lands and waters throughout Australia.

We pay our respect to Elders and acknowledge their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.

We also acknowledge future aspirations of all First Nations peoples. Through respectful relationships we will work for the mutual flourishing of Aboriginal and Torres Strait Islander Australians and non-Indigenous Australians.

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

