

23 November 2023

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OIA 28889

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I refer to your email of 12 November 2023 in which you request the following under the Official Information Act 1982 (OIA):

'This is an Official Information Act request for a FULL explanation of whats at the end of this link.

<https://find-and-update.company-information.service.gov.uk/company/OE020656>

All 3 of you are required to answer this OIA separately and you have 20 working days or less to provide your official response.

The date your response is due back to me is Friday the 8th of December 2023.

Please explain what this is ALL about,

and who all the "beneficial owners" and "active beneficial owners are by name and position,

and provide all statements and active statements as referenced at the link provided.

Please also provide ALL the information referred to in the attached screenshot where it states "all required information can be provided".

<https://find-and-update.company-information.service.gov.uk/company/OE020656>

The webpage you have provided contains the registration details for New Zealand's London based High Commission as an Overseas Entity with the Government of the United Kingdom (UK).

The UK Government's efforts to deal with foreign criminals using UK property to launder money includes the introduction of a register of overseas entities (ROE). The purpose of the ROE is to implement a new level of transparency to UK property ownership. The principal legislation governing the ROE is the Economic Crime (Transparency and Enforcement) Act 2022 (ECTEA 2022). As a result of the ROE, the UK Government requires that property held by Overseas Entities, such as the New Zealand Ministry of Foreign Affairs and Trade (the Ministry), be registered. The ECTEA 2022 places restrictions on land titles unless the overseas entity owner is registered on the ROE with the UK Government.

Regarding your query on the "beneficial owners" and "active beneficial owners", the High Commission is registered as an Overseas Entity not a trading company with beneficial owners. The "owner" is the Government of New Zealand. No individual is the beneficial owner or the active beneficial owner.

In response to your request for "*all statements and active statements as referenced at the link provided*" (<https://find-and-update.company-information.service.gov.uk/company/OE020656>) and "*ALL the information referred to in the attached screenshot where it states "all required information can be provided"*" (provided in Annex 1), the statement "*all required information can be provided*" relates to the filing of information required to register, and maintain registration, as an overseas entity with the UK Government. In the case of the High Commission's registration as an overseas entity, the registration information has been provided in accordance with UK Government requirements and is publicly available on the webpage you have provided by clicking on 'Filing history' and 'View PDF'. Therefore, this part of your request is refused under section 18(d) of the OIA, as the information requested is publicly available:

<https://find-and-update.company-information.service.gov.uk/company/OE020656/filing-history/MzM2NzM4Nzg0OWFkaXF6a2N4/document?format=pdf&download=0>

Please note that it is our policy to proactively release our responses to official information requests where possible. Therefore, our response to your request (with your personal information removed) may be published on the Ministry website: www.mfat.govt.nz/en/about-us/contact-us/official-information-act-responses/

If you have any questions about this decision, you can contact us by email at: DM-ESD@mfat.govt.nz. You have the right to seek an investigation and review by the Ombudsman of this decision by contacting www.ombudsman.parliament.nz or freephone 0800 802 602.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'SC', written in a cursive style.

Sarah Corbett
for Secretary of Foreign Affairs and Trade

Annex 1

Screenshotted reference to "all required information can be provided"

The screenshot shows a mobile browser interface. At the top, the status bar displays 'Gmail 7:12 PM Sun Nov 12' on the left, three dots in the center, and 'VPN' and battery icons on the right. The address bar shows the URL '...company-information.service.gov.uk'. The main content area is white with a thin border. It features a bold heading '1 active beneficial owner / 1 active statement'. Below this is a section titled 'Statement' with a green 'ACTIVE' tag. The text reads: 'All beneficial owners have been identified and all required information can be provided' and 'Notified on 31 January 2023'. A horizontal line separates this from the next section, 'Government Of New Zealand', also with a green 'ACTIVE' tag. This section lists two addresses: 'Correspondence address: Kinnaird House, 1 Pall Mall East, London, United Kingdom, SW1Y 5AU' and 'Principal office address: Level 12, Ministry Of Foreign Affairs And Trade, 195 Lambton Quay, Wellington 601, New Zealand'. It also states 'Notified on 1 January 1987'. At the bottom, it lists 'Governing law: New Zealand' and 'Legal form: Government', followed by 'Nature of control: Has significant influence or control'.

◀ Gmail 7:12 PM Sun Nov 12 ...company-information.service.gov.uk

1 active beneficial owner / 1 active statement

Statement **ACTIVE**

All beneficial owners have been identified and all required information can be provided Notified on **31 January 2023**

Government Of New Zealand **ACTIVE**

Correspondence address
Kinnaird House, 1 Pall Mall East, London, United Kingdom, SW1Y 5AU

Principal office address
Level 12, Ministry Of Foreign Affairs And Trade, 195 Lambton Quay, Wellington 601, New Zealand

Notified on
1 January 1987

Governing law Legal form
New Zealand **Government**

Nature of control
Has significant influence or control