



14 April 2023

Registrar of Companies
New Zealand Companies Office
Private Bag 92061
Victoria Street West
Auckland 1142

RE: FIRST AMERICAN TITLE INSURANCE COMPANY OF AUSTRALIA PTY LIMITED
(1022212/NZBN:9429037326852)

Dear Sirs/Madam,

We enclose herewith the Annual Financial Statements for the year ended 31 December 2022 for:

1. Annual Financial Report 2022 FATICA
2. Annual Financial report 2022 FATICA (NZ Branch)
3. Actuarial Letter – Section 78
4. Actuarial Letter – Section 78 (NZ Branch)
5. Information provided to NZ Companies Office while lodging the documents

The financial statements for First American Title Insurance Company of Australia Pty Ltd (“the Company”) (item #1 above) have been prepared in accordance with accounting principles generally accepted in Australia, and in filing with NZ Companies Office, the Directors wish to supply the following information:

1. The Directors wish to rely on an exemption notice provided by the Financial Markets Authority (FMA).
2. The exemption notice relied upon is Financial Markets Conduct (Overseas Registered Banks and Licensed Insurers) Exemption Notice 2021 LI Number 2021/324.
3. The Directors believe they can utilise this exemption notice because the Company meets the conditions of the exemption, namely:
 - a) The accounting period of the Company commenced before the exemption was granted
 - b) The financial statements of the Company comply with the law and regulatory requirements of the home jurisdiction (Australia) relating to the preparation, content, and audit of those statements.
 - c) The financial statements of the Company comply with accounting principles generally accepted in Australia.
 - d) The financial statements of the Company are audited by an approved auditor.
 - e) The audit report has been prepared by the approved auditor in respect of that audit.

- f) At all times accounting records are kept that enable the Company to ensure that –
 - i. The financial statements of the Company comply with accounting principles generally accepted in Australia and
 - ii. The New Zealand branch financial statements comply with generally accepted accounting practice; and
 - g) The financial statements of the New Zealand branch have been audited by a qualified auditor
 - h) A copy of the auditor’s report on the financial statements of the New Zealand branch has accompanied the lodgement of the financial statements of the Company
 - i) The financial statements of the Company are accompanied by this written notification to the Registrar advising that the company is relying on exemption notice LI 2021/324 in respect of the accounting period to which these financial statements relate
 - j) The financial statements of the Company and the New Zealand branch are in English.
4. Clause 7 (Statement of reasons) of the exemption notice confirms the company is able to take advantage of this exemption.
5. The Directors are seeking to take advantage of the exemption from compliance of overseas licensed insurers with the following provision of the Financial Markets Conduct Act 2013 (Act):
- Section 455(1)(c) (which requires an FMC reporting entity to keep accounting records that will enable it to ensure that its financial statements comply with generally accepted accounting practice)
 - Section 460 to 461A of the Act to the extent that those sections require the financial statements that are prepared to comply with New Zealand generally accepted accounting practice (NZ GAAP)
6. These exemptions are contained in Clause 6 of the exemption notice.

Yours faithfully,

DocuSigned by:
Dan Hogan
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Dan Hogan
General Manager, Risk & Compliance
First Title & First Mortgage Services