



Who the Record Names

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Who the Record Names

Version 1.0, 4 September 2026. This assessment examines what the public record publishes about the Commonwealth's five-year Microsoft arrangement and the companies named on it, and what that record does not connect. It reads the AusTender standing offer notice and AusTender's own report of the contract notices under it, the Australian Business Register and ASIC's organisations register for the companies named, Microsoft's published customer terms for Australia, the hosting certification register's entry for Microsoft, and the Digital Transformation Agency's and Microsoft's own statements about the arrangement. Every claim rests on an artefact pinned by hash in this case's register, or on an artefact already pinned in this corpus. No reporting is pinned and none is cited.

Scope

What is assessed. Forty-two register rows. **Thirty-eight artefacts were retrieved on 2 and 3 September 2026 and pinned by hash; four are inherited from earlier cases. The list below sums to thirty-eight against the register.** The standing offer notice, AusTender's two contract-notice reports and the report's criteria form [T-SON-1, T-CNSON-1, T-CNSON-2, T-CNSON-3]; eight Australian Business Register pages [B-ABR-1 to B-ABR-8]; seven ASIC Connect pages and one transcription [A-ASIC-1 to A-ASIC-7, A-ASIC-T1]; five Microsoft documents and pages [M-MCA-1, M-MCA-2, M-LRD-1, M-NEWS-1, M-NEWS-2]; six Digital Transformation Agency and BuyICT pages [D-DTA-1, D-DTA-2, D-BUY-1 to D-BUY-4]; a Modern Slavery Statements Register page and the statement it holds [S-MSR-1, S-MSR-2]; the hosting certification register as served on 3 September 2026 [H-HCF-L1]; and two Corporations Act documents and two ASIC guidance pages [L-CA-1, L-CA-2, L-ASIC-1, L-ASIC-2]. $4 + 8 + 8 + 5 + 6 + 2 + 1 + 4 = 38$. Four artefacts already pinned elsewhere in this corpus are relied on and are named where they are used: the certified-provider register capture of 21 July 2026 [H-HCF-1], the ASIC company extract for Microsoft Pty Ltd [H-MSAU-1], and the published PDFs of AOS-HCF-2026-001 v1.3 and AOS-CMP-2026-001 v1.3 [P-HCF-1, P-CMP-1].

What is not assessed. Which company any Commonwealth customer contracts with for any Microsoft cloud service, because no retrieved artefact says. The terms of the arrangement's deed, which no retrieved artefact carries. Whether any company named here carries on business in Australia within the meaning of the *Corporations Act 2001*, which is a legal question no artefact settles. Where any Commonwealth data sits.

How the negatives are stated. Every negative below states the population it was established over in the sentence that makes it. Every count names its test. Every nil states the width of the search and the control

that proves the method, and where a control is absent the sentence says so.

Two artefacts are browser complete saves, not scripted captures. ASIC Connect stopped answering scripted searches from this practice's address on 3 September 2026 (Limitations). Two searches were then made by the director in a browser and saved as complete webpages [A-ASIC-6, A-ASIC-7]. A complete save is the browser's rewritten serialisation of the page: resource references are rewritten to a sidecar directory, and the bytes are not the served bytes. The pinned hash freezes that serialisation. The rows the claims rest on are visible text, which the rewriting does not touch. A-ASIC-6 holds page 1 of its result set at ten rows per page: ten of the fifteen rows ASIC reports. Each claim that rests on either file says so where it rests.

1 The arrangement, and what it publishes

AusTender lists a standing offer with Microsoft for five years from 1 July 2026. The Standing Offer Notice SON₄₂₂₁₃₄₉, as served on 3 September 2026 [T-SON-1, sha256 f92f78c27d785f97...], is titled "Microsoft Whole of Government Volume Sourcing Agreement 6", with the description "Microsoft Whole of Government Volume Sourcing Agreement (VSA6)". Agency: Digital Transformation Agency. Publish date: 26-Feb-2026. Standing offer period: 1-Jul-2026 to 30-Jun-2031. Procurement method: limited tender, condition 10.3.e. Multi-agency access: yes, all agencies. Panel arrangement: yes.

The notice names two current suppliers, printed as follows:

Supplier Name	ABN	State / Postcode	Deed Start Date	Deed End Date
Microsoft Ireland Operations Limited	71 203 501 304	Outside Australia / N/A	01-Jul-2026	30-Jun-2031
MICROSOFT PTY LTD	29 002 589 460	NSW / 2113	01-Jul-2026	30-Jun-2031

Under Previous Suppliers the notice prints "There are currently no previous suppliers".

The notice publishes no document. Population: the notice page entire. Test over the bytes: hrefs whose target ends .pdf, .doc or .docx, or contains Attachment or Download, 0 of 47 hrefs; the string attachment, 0; the string Deed, 2, both of them the column headers *Deed Start Date* and *Deed End Date*; the string ATM, 1, in the site's copyright line. No control is needed: the test is a count over the bytes.

The notice assigns nothing to either supplier. Population: the notice page entire. The supplier table is headed *Supplier Name*, *ABN*, *State / Postcode* (with *State* and *Postcode* beneath it), *Deed Start Date* and *Deed End Date*, seven header strings, and carries no column for scope, product or service. The only description field on the page is the title string quoted above. The notice does not state which supplier supplies what.

The Digital Transformation Agency’s announcement names no company, no document and no address for the agreement. Its article of 26 February 2026, rendered and captured on 3 September 2026 [D-DTA-1, sha256 c83ef7e793655414...], states that the agency “has secured a new five-year Volume Sourcing Agreement with Microsoft on behalf of the Australian Government”, that “the agreement introduces a standardised contracting framework”, that “The arrangement includes enhanced legal provisions that improve governance, reporting, security, liability and regulations for the handling and use of government data”, and that the agreement “will commence on 1 July 2026”. Population: the page’s text entire. Counts: Pty o, Ireland o, deed o, Data#3 o; BuyICT 2, both in the site’s navigation menu.

Where the agency points, the addresses tested do not resolve to the arrangement. The agency’s own address for the Microsoft Volume Sourcing Arrangement, fetched on 2 September 2026 [D-DTA-2, sha256 6ff29106d56007e3...], resolves to the agency’s general BuyICT page, which says its Whole of Government arrangements “offer increased transparency, standard terms and conditions and improved contract management” and directs the reader to buyict.gov.au; over that page, deed o, Pty o, VSA o. BuyICT’s buyer-arrangement address for Microsoft, fetched raw and rendered on 3 September 2026 [D-BUY-4, D-BUY-2], renders “Page not found” and “The page you’re looking for is no longer available”, served with HTTP status 200. BuyICT’s home page as an HTTP body [D-BUY-3] is a JavaScript shell whose text is the word “Loading...” and navigation, with no content; rendered [D-BUY-1], it carries the site’s navigation and offers login or registration, and over its rendered text Microsoft o and arrangement o. *No claim is made here about what sits behind a login.*

Microsoft’s own announcements name no legal entity. Its post of 26 February 2026 [M-NEWS-1] says “we have recently signed a new, five-year Volume Sourcing Arrangement (VSA) with the Federal Government” and that the arrangement is “Led by the Digital Transformation Agency”; over the page, Pty o and Ireland o. Its post of 2019 on the prior arrangement [M-NEWS-2] says “The licensing agreement will be managed by Data#3”.

2 The two suppliers, in the registers’ own words

The supplier outside Australia

The Australian Business Register records Microsoft Ireland Operations Limited as an Other Incorporated Entity. The current record for ABN 71 203 501 304, as served on 3 September 2026 [B-ABR-1, sha256 112603500807389b...], prints: entity name “Microsoft Ireland Operations Limited”; ABN status “Active from 01 Aug 2018”; entity type “Other Incorporated Entity”; goods and services tax “Registered from 01 Aug 2018”; main business location “18. D18 P521”. The historical record [B-ABR-2] carries one entity name, current from 01 Sep 2018.

The record carries no ASIC registration line. Population: the record page entire. Test: the string ASIC registration, o. Control: the same string occurs once on each of the three other current ABR records read in this assessment [B-ABR-3, B-ABR-5, B-ABR-6], where it heads the line “ASIC registration - ACN or

ARBN or ARSN or ARFN” followed by the company’s number, so the test finds the line where the register prints it.

No entity of that name appears on ASIC’s organisations register, on the searches captured.

Three name searches of ASIC Connect’s Organisations and Business Names register were captured on 3 September 2026, each in a fresh session. The search “MICROSOFT IRELAND” [A-ASIC-1, sha256 bc8a9be42d378881...] returned, in ASIC’s words, “3 results found”, and the three rows are MICROSOFT (Non Registered Entity), MICROSOFT PTY LTD (ACN 002 589 460, Registered) and MICROSOFT PTY. LIMITED (ACN 010 148 633, Deregistered). The search “MICROSOFT IRELAND OPERATIONS LIMITED” [A-ASIC-2, sha256 84350a13e890fb82...] returned “4 results found”, and none of the four rows is named Microsoft Ireland Operations Limited. The search “MICROSOFT” [A-ASIC-6, sha256 2f288684a1fdc8fa...] returned “15 results found”; **this artefact is a browser complete save by the director, a rewritten serialisation and not the served bytes, and it holds ten of the fifteen rows**; none of the ten is named Microsoft Ireland Operations Limited. **The stated gap in that population is the five rows on the result set’s second page, which are not in the saved bytes.** The practice’s transcription of the same search made earlier that day [A-ASIC-T1] lists them as MICROSOFT SUPERANNUATION NOMINEES PTY LTD, MICROSOFT AUSTRALIA HOLDINGS PTY LIMITED, MICROSOFT CLIPCHAMP HOLDINGS PTY LTD, MICROSOFT LUXEMBOURG INTERNATIONAL MOBILE SARL and AUSTRALIAN ASSOCIATION OF MICROSOFT SOLUTION PROVIDERS LIMITED; a transcription is not a capture, and no claim here rests on it.

Control for the name searches. The control sits on the broadest of the three terms. The tenth row of the “MICROSOFT” search is MICROSOFT ONLINE, INC., ARBN 154 745 089, Foreign Company, Registered, NORTH SYDNEY NSW 2060 [A-ASIC-6, the same complete save]. That proves the register returns registered foreign companies to a name search on that term. It does not prove that the two narrower searches would have surfaced the entity if it were there; for those, the claim rests on the rows they returned, all of which are in the captures.

A number search on the company’s ABN returned nothing. The search “71203501304” [A-ASIC-3, sha256 9eb0bc0c9b2f2032...] returned, in ASIC’s words, “0 results found”. Control: a number search on a number known to be on the register, “002589460” [A-ASIC-4, sha256 3fda08aa48c4102b...], went directly to the company summary for MICROSOFT PTY LTD, ACN 002 589 460, ABN 29 002 589 460, registration date 11/04/1983, status Registered, type “Australian Proprietary Company, Limited By Shares”, registered office locality SYDNEY NSW 2000. The same method finds a number that is on the register, so the nil on 71203501304 is a result about that number.

What those nils do not establish: whether the company carries on business in this jurisdiction within the meaning of the Corporations Act; whether any exemption applies; whether it is registered under some other name; and ASIC’s own statement of what its search covers, which was not read (Limitations).

The supplier in Australia

The Australian Business Register records Microsoft Pty Ltd as an Australian Private Company with an ACN. The current record for ABN 29 002 589 460, as served on 3 September 2026 [B-ABR-3, sha256 c715055669d76b10...], prints: entity name “MICROSOFT PTY LTD”; ABN status “Active from 01 Apr 2000”; entity type “Australian Private Company”; main business location “NSW 2060”; and the line “ASIC registration - ACN or ARBN or ARSN or ARFN 002 589 460”.

The notice prints the company’s former postcode. The historical record [B-ABR-4, sha256 287746d42bfd3397...] lists the main business location as NSW 2113 in successive rows from 01 Apr 2000 to 28 Jun 2021, and NSW 2060 from 28 Jun 2021, current. The standing offer notice [T-SO-N-1] prints NSW 2113.

The Irish company holds one share of the Australian company. The ASIC current company extract for Microsoft Pty Ltd, purchased on 21 July 2026 and pinned in hcf-strategic-2026-07 [H-MSAU-1, sha256 923ff29b0723170e...], lists two members: MICROSOFT IRELAND RESEARCH, Org No. 652 192 366, holding 1,530,001 ordinary shares, beneficially held, fully paid; and MICROSOFT IRELAND OPERATIONS LIMITED, Org No. 652 192 375, holding 1 ordinary share, beneficially held, fully paid. The class total is 1,530,002 ordinary shares. The ultimate holding company is recorded as MICROSOFT CORPORATION, Org No. 064 915 555.

Two further companies, named by Microsoft as operating the servers

Microsoft’s Australian modern slavery statement names two Australian proprietary companies as operating its Australian datacentre servers. The Modern Slavery Statements Register holds statement 2025-3321 for reporting entity MICROSOFT PTY LTD, ABN 29 002 589 460, period 01 July 2024 to 30 June 2025 [S-MSR-1, sha256 97d2c30b29478217...]. The statement’s PDF, 33,417,377 bytes [S-MSR-2, sha256 cb69f81da2d00616...], states in the footnote to its approval:

“Microsoft Pty Ltd is a proprietary company limited by shares and its principal operations are to market, distribute, and sell Microsoft’s goods and services in Australia. Microsoft Australia Holdings Pty Ltd and Microsoft Datacenter (Australia) Pty Ltd are also proprietary companies limited by shares and together operate Microsoft’s Australian datacenter servers.”

Both are on the Australian Business Register as Australian Private Companies with ACNs. MICROSOFT AUSTRALIA HOLDINGS PTY LIMITED, ABN 16 077 753 390, active from 01 Apr 2000, ASIC registration 077 753 390 [B-ABR-5, sha256 530b47a433c80f7d...]. MICROSOFT DATACENTER (AUSTRALIA) PTY LIMITED, ABN 31 163 792 078, active from 01 Dec 2013, ASIC registration 163 792 078 [B-ABR-6, sha256 fdbdf724a0d80b7e...]. The eighth row of the “MICROSOFT” search [A-ASIC-6, the complete save] is MICROSOFT DATACENTER (AUSTRALIA) PTY LIMITED, ACN 163 792 078, Australian Proprietary Company, Registered. The statement describes the two as operating servers; it does not say that either contracts with anyone.

3 What Microsoft's published terms say

Microsoft's published customer agreement for Australia defines Microsoft as the Irish company, under Irish law. The Microsoft Customer Agreement sample for Australia, dated March 2023 and published on microsoft.com as a Word document, retrieved on 2 September 2026 [M-MCA-2, sha256 822f781858623d30...], defines the party: "“Microsoft” means Microsoft Ireland Operations Limited." Its applicable-law clause reads: "This Agreement will be governed by and construed in accordance with the laws of Ireland." Its notices clause directs notices to Microsoft to "Microsoft Operations Ireland Limited", care of "Microsoft Operations Pte Ltd", at "182 Cecil Street", "#13-01 Frasers Tower", "Singapore 069547", "Republic of Singapore". *The address is set as separate lines in the document and is quoted here line by line. The notices clause prints the company's name in a different word order from the definition; both are quoted as printed and not reconciled.*

The general Microsoft Customer Agreement defines Microsoft as the United States corporation, under Washington law. The general agreement, published on microsoft.com as a PDF and retrieved on 2 September 2026 [M-MCA-1, sha256 6e8bb0dc3d50d164...], defines the party: "“Microsoft” means Microsoft Corporation." Its applicable-law clause reads: "This Agreement will be governed by and construed in accordance with the laws of the State of Washington and federal laws of the United States."

Neither document names Azure. Population: each document's text entire. Test: the string Azure, o in the Australia sample (the Word document's text layer) and o in the general agreement (the PDF's text layer).

Microsoft's own account of who licenses in Australia names the Irish company as licensor for the region. Its Microsoft Learn page on the Microsoft Customer Agreement invoice, as served on 2 September 2026 [M-LRD-1, sha256 7db35167d7cb6098...], describes a Limited Risk Distributor model that applies in a list of countries of which Australia is the first, and states: "The selling entity is the local LRD subsidiary"; and "For LRD sales, the Licensor is either MS Corp or MIOL. For the Americas, the Licensor is MS Corp (1010). For EMEA and APAC, the Licensor is MIOL (1062)." The page names no Australian subsidiary.

Neither agreement is a Commonwealth instrument. This section states what Microsoft's published customer terms for Australia say. It does not state what the Commonwealth's arrangement says, which no retrieved artefact carries.

4 The certification entry

The hosting certification register's entry for Microsoft is a product name with a region qualifier. Under Cloud Services, the register capture of 21 July 2026 pinned in hcf-strategic-2026-07 [H-HCF-1, sha256 8ea432069b2f8378...] and the page as served on 3 September 2026 [H-HCF-L1, sha256 0036bc5d6b8d18ad...] each print the entry "Microsoft Azure Cloud (Australian Regions)" once, between "Macquarie Technology - Government Cloud Service offering" and "Oracle Australia - Cloud Service offering".

The entry carries no company identifier and no site code. Population: each of the two pages entire. Test:

the strings ACN o and ABN o on each page; Azure i and Microsoft i on each. Site-code tokens of the form letters followed by digits, such as SYDI, IC₄ and MELII, occur on each page, and none is attached to the Microsoft entry.

The entry matches no entity name on either register, on the searches captured. The Australian Business Register's name search for "Microsoft Azure" over active ABNs and names, run on 3 September 2026 [B-ABR-7, sha256 b3ca70d1c68efa38...], returned four matches: MICROSOFT PTY LTD, MICROSIFT PTY LTD, MACROSOFT PTY LTD and MICROSOIL. ASIC Connect's name search for "microsoft azure" [A-ASIC-7, sha256 028e7886dc0ed73e...; **a browser complete save by the director, a rewritten serialisation and not the served bytes, holding all three rows**] returned "3 results found": MICROSOFT (Non Registered Entity), MICROSOFT PTY LTD and MICROSOFT PTY. LIMITED. Population: those four matches and those three rows. None is named "Microsoft Azure Cloud (Australian Regions)", and none contains the word Azure. ASIC matched the search on the word *microsoft* alone.

What this does not reach. It does not establish that no name on ASIC's register contains the word Azure: no search for "AZURE" alone was captured (Limitations). It establishes that the certified string matches no entity name on the searches made.

The certifier's register has been read at this tier before, and the question of the certificate holder was left open there. AOS-HCF-2026-001 vi.3 [P-HCF-1, sha256 7a545b3316667905...] states, in its note on Google and Microsoft, that "the HCF certifies a product ("Google Australia - Cloud Service offering (Google Cloud Platform - Australian Regions)"; "Microsoft Azure Cloud (Australian Regions)"), not a legal entity, and the certificate-holding company is not confirmed; the entity shown is the head Australian entity." This assessment does not confirm it either.

5 What the contract notices report

Every contract notice AusTender reports under the new arrangement names the Australian company.

AusTender's own report, *Contract Notice by Standing Offer*, was downloaded on 3 September 2026 for SON4221349 as a spreadsheet [T-CNSON-1, sha256 dca754545d265fbc...]. The sheet prints its criteria: Portfolio / Agency, All Active Agencies; Date Range, 1-Jan-2019 to 3-Sep-2026; Date Type, Publish Date; Value Range (AUD), All; Category, All; SON ID, SON4221349. It carries six contract notices, every one with Supplier ABN 29 002 589 460:

CN ID	Agency	Supplier name, as agency-entered	Description	Value (AUD)
CN4273898	Department of the Prime Minister and Cabinet	Microsoft Pty Ltd - 203143001	ICT Services	624,961.55
CN4272579	Department of Veterans' Affairs	Microsoft Pty Ltd	Microsoft Enhanced Engineering Support Services	416,336.80
CN4267545	Department of Employment and Workplace Relations	MICROSOFT PTY LTD	Software support services	274,950.78
CN4266684	Services Australia	Microsoft Pty Ltd	Documentation Support	415,085.31
CN4262878	Services Australia	Microsoft Pty Ltd	Training Services	46,170.30
CN4259135	Services Australia	Microsoft Pty Ltd	Training Services	227,644.45

The six values sum to 2,005,149.19.

None of the six describes a cloud service. Population: the Description column of those six rows. Test: case-insensitive substring, azure o, cloud o, licen o.

Under the prior arrangement, the Irish company's ABN appears on four notices of sixty-four. The same report for SON3615953, same criteria, same day [T-CNSON-2, sha256 f68984136d12ce03...], carries sixty-four contract notices: Supplier ABN 29 002 589 460 on sixty, and ABN 71 203 501 304 on four. The supplier name entered against those four is "Microsoft Ireland Operations Limited" on two, "Microsoft Pty Ltd" on one and "Digital Transformation Agency" on one, which shows that the supplier-name field is entered by the reporting agency and is not the register's name for the entity. The sixty-four values sum to 245,851,679.74. Population for the negative: the Description column of the sixty-four rows; azure o; cloud o; licen o.

Control proving the method. The header row parsed from each sheet names its columns; $60 + 4 = 64$ and $6 = 6$ reconcile to each sheet's row count; the CN ID column re-executes.

What these nils do not establish. An agency's consumption under a volume sourcing arrangement is not necessarily reported as a contract notice against the standing offer. The absence of the word "azure" from the descriptions is a fact about AusTender reporting, and is stated as one.

6 The finding

Each element below is stated with its own artefact and its own date. Each is what the artefact shows.

One. The Standing Offer Notice SON₄₂₂₁₃₄₉ names two current suppliers, Microsoft Ireland Operations Limited (ABN 71 203 501 304, “Outside Australia”) and MICROSOFT PTY LTD (ABN 29 002 589 460, NSW 2113), for the period 1-Jul-2026 to 30-Jun-2031. T-SON-1, as served 3 September 2026.

Two. That notice publishes no document (0 document hrefs of 47; Deed occurs only as two column headers) and assigns no product or service to either supplier (no such column; the only description field is the title). T-SON-1, as served 3 September 2026.

Three. The Australian Business Register records Microsoft Ireland Operations Limited as an “Other Incorporated Entity” with an ABN active from 01 Aug 2018 and no ASIC registration line, where the three other current records read carry that line. B-ABR-1, B-ABR-3, B-ABR-5, B-ABR-6, as served 3 September 2026.

Four. No entity named Microsoft Ireland Operations Limited appears among the rows returned by three captured ASIC name searches: “MICROSOFT IRELAND” (3 results, all in the capture), “MICROSOFT IRELAND OPERATIONS LIMITED” (4 results, all in the capture), and “MICROSOFT” (15 results, of which a browser complete save holds ten). The control sits on the broadest of the three terms: the “MICROSOFT” search returns MICROSOFT ONLINE, INC., ARBN 154 745 089, Foreign Company, Registered. That proves the register returns registered foreign companies to a name search on that term. It does not prove that the two narrower searches would have surfaced the entity if it were there. A number search on its ABN returns “0 results found”, where a number search on a known ACN reaches its record. A-ASIC-1, A-ASIC-2, A-ASIC-6, A-ASIC-3, A-ASIC-4, 3 September 2026.

Five. Microsoft’s published customer agreement sample for Australia defines “Microsoft” as Microsoft Ireland Operations Limited and is governed by the laws of Ireland; the general agreement defines “Microsoft” as Microsoft Corporation under the laws of the State of Washington; neither names Azure. M-MCA-2, M-MCA-1, published March 2023 and retrieved 2 September 2026.

Six. The hosting certification register’s entry for Microsoft is “Microsoft Azure Cloud (Australian Regions)”, with no ACN, ABN or site code on the page, and that string matches none of the four active ABR names returned for “Microsoft Azure” and none of the three ASIC names returned for “microsoft azure”, the latter a browser complete save. H-HCF-1, 21 July 2026; H-HCF-L1, B-ABR-7, A-ASIC-7, 3 September 2026.

Seven. Every one of the six contract notices AusTender reports under SON₄₂₂₁₃₄₉ names Supplier ABN 29 002 589 460, and none of the six descriptions contains “azure”, “cloud” or “licen”. T-CNSON-1, report criteria as printed, downloaded 3 September 2026.

Eight. The Digital Transformation Agency’s article on the agreement names no company, no document and no address for it; the agency’s own address for the arrangement resolves to its general BuyICT page; BuyICT’s arrangement address for Microsoft renders a “Page not found” page under HTTP status 200. D-DTA-1, D-BUY-2, D-BUY-4, 3 September 2026; D-DTA-2, 2 September 2026.

Nine. Microsoft’s Australian modern slavery statement names Microsoft Australia Holdings Pty Ltd and

Microsoft Datacenter (Australia) Pty Ltd as the companies that “together operate Microsoft’s Australian datacenter servers”, and the Australian Business Register records both as Australian Private Companies with ACNs. S-MSR-2, statement period to 30 June 2025; B-ABR-5, B-ABR-6, 3 September 2026.

Ten. The ASIC extract for Microsoft Pty Ltd records Microsoft Ireland Operations Limited as a member holding one of 1,530,002 ordinary shares, and Microsoft Corporation as ultimate holding company. H-MSAU-1, 21 July 2026.

Limitations

ASIC Connect stopped answering scripted searches from this practice’s address after four. From 10:54 UTC on 3 September 2026 every scripted attempt returned the text “Unable to conduct search - name or number not specified” beneath a reCAPTCHA challenge; one such response is pinned as evidence of the block [A-ASIC-5, sha256 4cdac680c2b78f18...]. No attempt was made to pass the challenge. Two searches were then made by the director in a browser and saved as complete webpages [A-ASIC-6, A-ASIC-7]: rewritten serialisations, not served bytes, and A-ASIC-6 holds ten of fifteen rows.

No search for “AZURE” alone was captured, and no ASIC search of any kind was captured after the block.

ASIC’s written statement of what its search covers was not read. The ASIC Connect help page returned HTTP 403. Coverage is stated from the register’s observed behaviour and the two controls in section 2.

AusTender’s contract-notice search returned its own form to every query, by keyword, supplier ABN, supplier name and contract notice number, so no contract notice’s detail page was read. Section 5 rests on AusTender’s own report output, whose criteria the sheet prints.

The Corporations Act compilation held is that of 10 July 2024 [L-CA-1, L-CA-2], the compilation the Federal Register of Legislation address names; it was not confirmed as the latest. No claim in this assessment applies it.

Every blob is held out of git, including the 33 MB statement PDF and the two sidecar directories of the complete saves. The register is tracked, and every hash in it was verified against the bytes on 3 September 2026.

Every negative is bounded by the artefacts retrieved on 2 and 3 September 2026 and by the population stated beside it.

What this assessment is not

It is not a finding about which company a Commonwealth customer contracts with for Azure, or for any Microsoft cloud service. No retrieved artefact says. The notice assigns nothing; the six contract notices under it describe no cloud service; the customer agreement sample is not the Commonwealth’s arrangement and names no product.

It is not a finding of non-registration in the legal sense. It is a finding that the captured searches of ASIC’s organisations register found no entity of the name, and that the Australian Business Register’s record carries no ASIC line, on the day. Whether the company carries on business in Australia within the meaning of the *Corporations Act 2001* is a legal question, and no artefact here settles it.

It is not a finding that the deed is withheld. The deed is not published with the notice; where the Digital Transformation Agency points, the addresses tested do not resolve to it. Nothing retrieved says where it is or who may read it.

It is not a mapping of any Commonwealth cloud arrangement to section 12F of the *Security of Critical Infrastructure Act 2018*. AOS-CMP-2026-001 v1.3 [P-CMP-1, sha256 090fc69e08cda10c...] states that it “does not establish that any particular Commonwealth cloud arrangement falls within that class, and asserts no such mapping”. That limit continues here.

It is not a finding about where any Commonwealth data sits.

Every AusTender negative is a statement about AusTender reporting, not about what is bought.

It is not a finding that ASIC’s register lacks the entity. It is a finding about the searches captured, their populations and their controls, and one of those populations is ten rows of fifteen.

Related published assessments

- **AOS-HCF-2026-001**, *Jurisdiction of Control in the Hosting Certification Framework, Strategic Tier*. The certified-provider register read at the Strategic tier; Microsoft’s row, and the note that the certificate holder is not confirmed.
- **AOS-CMP-2026-001**, *The Compellability Gap in Commonwealth Cloud Assurance*. The instruments of Commonwealth cloud assurance, and the limit this assessment carries forward.
- **AOS-CS0-2026-001**, *What the Certification Is Over*. What the framework’s published instruments say the certification is over.
- **AOS-HCD-2026-001**, *What the Consultation Publishes*. The reform consultation package, and the notice the certification pages carry.
- **AOS-HCE-2026-001**, *The Hosting Certification Exemption*. Section 30AB(4) of the *Security of Critical Infrastructure Act 2018*.

End of document.