

# BERNICE'S SERIOUS

## CHECKLIST

SAPIENCE FINANCIAL

CAMPAIGN ASSET • THE HOUSE  
OF RISK

EPISODE 2: SHADOW DIRECTORSHIP & DPN EXPOSURE AUDIT

**The Structural Reality Check:** Assisting with the bookkeeping, accessing business banking portals with security tokens, and choosing which vendor invoices to pay may trigger personal statutory liability as a Shadow Director under Section 9 of the Corporations Act. If your entity falls into insolvency or triggers un-lodged tax arrears, federal liquidators and automated ATO systems will map the digital workflow footprint right to your private keyboard, placing your family home title directly in the firing line.

### 1. DE FACTO CONTROL & BANKING TOKEN AUTONOMY

#### 1.1 Registry Isolation Multi-Check

Are you executing core operational payments or executing business banking clearings while remaining completely off the company's official ASIC corporate registry file?

#### 1.2 Unconditional Token Management Autonomy

Do you hold unconditional administrative control over business banking tokens to authorise ledger transactions independently without a prior, signed corporate resolution from the registered director?

#### 1.3 Vendor Prioritisation Decisions

Are you acting as the primary gatekeeper choosing which external trade invoices are paid and which are deferred, thereby functionally controlling the company's insolvency limits?

### 2. STATUTORY TAX LINES & AUTOMATED DPN SAFEGUARDS

#### 2.1 Automated BAS/Superannuation Reporting System

Are your internal accounting ledgers linked to automated data systems that flag outstanding employee superannuation and BAS payment tools?

#### 2.2 Lockdown Director Penalty Notice Awareness

Are you aware if your company fails to lodge its BAS (for PAYG and GST) within three months of the due date, or fails to lodge its Superannuation Guarantee Charge (SGC) statement on time,

the ATO can issue a Lockdown Director Penalty Notice that strips away all corporate shield insulation?

**2.3 Shadow Director DPN Extension Risk**

Has your accounting team confirmed that shadow directors are subjected to the exact same personal clawback mandates as registered directors under the ATO's expanded collection profiles?

**2.4 Household Capital Separation Realignment**

Have you ensured that private household lifestyle accounts—such as school tuition or vehicle leases—are never directly underwritten using un-remitted company PAYG or GST allocations?

### 3. STRUCTURAL GOVERNANCE & ASSET PROTECTION MOATS

**3.1 Written Delegations of Authority Protocol**

Do you possess a formal, executed business resolution explicitly detailing that your bookkeeping involvement is limited strictly to structural data processing, with all ultimate payment authority remaining with the registered board of the company?

**3.2 Family Title Deed Decoupling Matrix**

Is the primary family home title held entirely outside the name of any party who handles business corporate accounts, removing it from automated liquidator targeting logs during an unexpected commercial collapse?

**3.3 Independent External Governance Sweeps**

Does an independent specialist accountant perform a quarterly compliance audit of all token authorizations to ensure formal business actions match current regulatory realities?

## IS AN INVISIBLE SHADOW TITLE UNDERMINING YOUR PRIVATE SHIELD?

If you checked fewer than 10 boxes today, your home, assets and personal wealth accumulations are directly exposed to retroactive statutory liabilities. Do not wait for a formal ATO Director Penalty Notice to establish clear, written governance boundaries.



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