इंडियन बैंक Indian Bank

कॉर्पोरेट कार्यालय: लेखा विभाग
CO: ACCOUNTS DEPARTMENT

CO/ACCTS/559/2026-27 Date: 13.11.2026

To,
The Secretary,
Accounting Standards Board (ASB),
The Institute of Chartered Accountants of India,
ICAI Bhawan, Post Box No. 7100,
Indraprastha Marg, New Delhi – 110002.

Madam/ Dear Sir,

Subject: Comments and Suggestions on Exposure Draft – Amendments to Ind AS 28 (Investments in Associates and Joint Ventures)

We refer to the Exposure Draft issued by the Accounting Standards Board (ASB) of the Institute of Chartered Accountants of India (ICAI) on the proposed amendments to Paragraphs 18, 19, and 45M of Ind AS 28 - Investments in Associates and Joint Ventures, inviting stakeholder comments by November 14, 2026.

In this regard, we submit our views as under:

S.No	Proposed Text	Our views
1	Similar entities include entities that have a main business activity of investing in particular types of assets (see paragraph 49(a) of Ind AS 118).	Distinction between pure investment-return vehicles and strategic, going-concern associates/JVs that complement core banking operations may be provided in the standard.
2	Paragraph 19 allows an entity holding an associate partially through a venture capital organisation, mutual fund, unit trust, or similar entity to elect FVTPL under Ind AS 109 for that specific portion, while applying the equity method to the remaining portion. It also deletes references to "investment-linked insurance funds".	It may be clarified that where an entity's overarching intent for an associate or joint venture is long-term, going concern value addition to core banking operations, the entity may be permitted to apply a uniform equity-method treatment across both direct and indirect tranches rather than bifurcating measurement into trading-style FVTPL.

Corporate Office: 254-260, Avvai Shanmugam Salai, Royapettah, Chennai – 600 014
Phone: 044-2813 4418/4454, Email: hoaccounts@indianbank.co.in
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3	Paragraph 45M links the effective date directly to Ind AS 118 and references to early adoption in accordance with paragraph C1 of Ind AS 118, while noting in a footnote that 'Ind AS 118 is yet to be notified by the Ministry of Corporate Affairs (MCA).	It may be taken up with the Ministry of Corporate Affairs to notify both Ind AS 118 and these amendments to Ind AS 28 concurrently with a uniform prospective effective date. Furthermore, ICAI should provide transitional relief clarifying that entities are not required to retrospectively restate existing associate holdings previously accounted for under the equity method.

We are of the view that incorporating these practical, India-specific enhancements will significantly strengthen the clarity of Ind AS 28, reduce implementation friction, and ensure robust financial reporting across the banking sector.

Yours faithfully,

General Manager-CFO