Comments On Exposure Draft

Amendments to IFRS 19 Subsidiaries without Public Accountability: Disclosures

Question 1—Presentation and disclosure in financial statements (proposed amendments to paragraphs 137, 142–159 and 163 of IFRS 19, paragraph A3 in Appendix A of IFRS 19 and paragraph B8 of Appendix B of IFRS 19)

Opinion– Yes agree, In the IASB's view, the new disclosure requirements relating to aggregation and disaggregation are likely to help eligible subsidiaries provide information to meet the needs of users of their financial statements, satisfying one of the principles in paragraph BC2.

If an entity uses management-defined performance measures, it is required to apply the related disclosure requirements in IFRS 18. If an eligible subsidiary uses management-defined performance measures, information about them is expected to be relevant tousers of the subsidiary's financial statements

The IASB is of the view that disclosures of management-defined performance measures are important for eligible subsidiaries that use them, but that many eligible subsidiaries will not use them

Question 2—Supplier finance arrangements (proposed amendments to paragraphs 167–168 of IFRS 19)

Opinion– Yes agree, An entity shall disclose in aggregate for its supplier finance arrangements .However, an entity shall disclose separately the terms and conditions of arrangements that have dissimilar terms and conditions.

Question 3—International tax reform—Pillar Two model rules (proposed amendments to paragraphs 198–199 of IFRS 19)

Opinion– The IASB reviewed the disclosure requirements introduced by the amendments to IAS 12 and observed that they relate to a set of facts and circumstances specific to a small group of eligible subsidiaries.

Therefore, the IASB proposes only one change to the requirements—to remove the disclosure objective. This change is consistent with the IASB's decision not to use disclosure objectives in IFRS 19.

Question 4—Lack of exchangeability (proposed amendments to paragraphs 221–223 of IFRS 19)

Opinion– As set out in paragraph BC50 of the Basis for Conclusions on IFRS 19, the IASB decided not to include disclosure objectives in IFRS 19. The IASB therefore proposes removing the disclosure objective introduced into IAS 21 by Lack of Exchangeability but retaining the detailed requirements that were specified as being necessary to satisfy the objective.

In the IASB's view, the requirements all satisfy the principles for developing disclosure requirements set out in paragraph BC2. The resulting disclosures would provide information about measurement uncertainties and about accounting policy choices, all of which are of interest to the users of eligible subsidiaries' financial statements.

Question 5—Financial instruments classification and measurement (no changes proposed)
Opinion– Yes agree, The amendments to IFRS 19 were made without reducing the disclosure requirements. Having considered the amendments, the IASB proposes not to reduce the disclosure requirements because they provide users of eligible subsidiaries' financial statements with information about short-term cash flows and obligations, as well as solvency and liquidity.

Question 6—Regulatory assets and regulatory liabilities

Opinion– The IASB decided not to propose reduced disclosure requirements for eligible subsidiaries with regulatory assets and regulatory liabilities within the scope of the prospective RARL Standard at this stage

Most of the disclosure requirements appeared necessary to support the new model, and the IASB concluded that removing objectives and guidance at this stage would not significantly reduce costs for preparers of financial statements.

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