Comments on IASB Exposure Draft - Amendments to IFRS 19 Subsidiaries Without Public Accountability: Disclosures - IASB/ED/2024/5

We fully support the proposal to reduce disclosure requirements for subsidiaries without public accountability. The amendments provide much-needed simplification for these entities while maintaining the relevance and transparency of financial reporting. By focusing on materiality rather than significance, the proposal aligns with broader trends in financial reporting, ensuring that users of financial statements receive information that is truly useful for decision-making.

Key Points of Support:

1. Simplified Compliance: The reduced disclosures will significantly lower compliance burdens for subsidiaries, particularly in emerging markets and for smaller entities. This is a practical and efficient solution, especially for subsidiaries reporting under full IFRS for consolidation purposes.

2. Materiality Focus: We support the shift towards materiality-based disclosures, as it prevents unnecessary reporting of insignificant information while ensuring that all critical data is still provided to users.

3. Support for Multinationals: For multinational corporations, the amendments will streamline the consolidation process by ensuring that subsidiaries focus on disclosing relevant financial information, leading to more consistent and efficient group reporting.

Overall, the amendments strike the right balance between reducing compliance costs and ensuring high-quality financial information, and we believe this proposal will benefit both subsidiaries and their parent companies.

We appreciate the IASB's efforts to simplify financial reporting in this area and look forward to the successful implementation of these amendments.