To
The Secretary
Accounting Standards Board
The Institute of Chartered Accountants of India
ICAI Bhawan, Ground Floor, Administrative Block
A-29, Sector-62, Noida, Uttar Pradesh – 201309

Subject: Comments on Exposure Draft of Amendments to Ind AS 28 — Investments in Associates and Joint Ventures

Dear Sir/Madam,

With reference to the **Exposure Draft of amendments to Indian Accounting Standard (Ind AS) 28, *Investments in Associates and Joint Ventures***, issued by the Accounting Standards Board of ICAI for public comments, we hereby submit our comments and suggestions for consideration.

We appreciate the initiative of the Accounting Standards Board in aligning Ind AS with the corresponding developments in IFRS Accounting Standards and in providing stakeholders an opportunity to contribute to the standard-setting process.

Having examined the proposed amendments to paragraphs 18 and 19 and the proposed insertion of paragraph 45M, we are broadly supportive of the objective of clarifying and expanding the scope of the fair value option for investments in associates and joint ventures held through specified investment entities.

In this regard, we request the Board to consider the following suggestions:

1. **Clarity in the definition of similar entities:** The expression “similar entities” should be accompanied by sufficiently clear guidance and illustrative examples to ensure consistent application across entities and industries.

2. **Consistency in the fair value election:** The requirements relating to the election of the fair value option at initial recognition should clearly address investments held directly and indirectly, including situations involving multiple investment-holding structures.

3. **Measurement of partially held investments:** Paragraph 19 should provide adequate clarity regarding the identification and measurement of the portion of an investment eligible for the fair value option, particularly where the remaining portion continues to be accounted for using the equity method.

4. **Transition and effective date:** The proposed transition requirements under paragraph 45M should be coordinated with the implementation of Ind AS 118. Since the Exposure Draft itself notes that Ind AS 118 is yet to be notified by the Ministry of Corporate Affairs, appropriate transitional guidance and sufficient implementation time should be provided.
5. **Implementation guidance:** Illustrative examples addressing direct investments, indirect holdings, partially held investments and investment-linked insurance funds would facilitate consistent interpretation and reduce implementation difficulties.

We believe that these clarifications would enhance the understandability, consistency and practical applicability of the proposed amendments while preserving the intended accounting treatment.

We request the Accounting Standards Board to consider the above suggestions while finalising the amendments to Ind AS 28.

Thank you for providing this opportunity to submit our comments.

Yours faithfully,

J&K Branch of NIRC of the ICAI