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Subject: Comments on Exposure Draft of Covid-19-Related Rent Concessions beyond 30 June 2021

- 1) I welcome the opportunity provided for sending comments on Exposure Draft of Covid-19-Related Rent Concessions beyond 30 June 2021
- 2) I support initiative of Accounting Standards Board of ICAI to extend the timeline and provide clarifications.
- 3) My view
  - a) I welcome and support the Exposure Draft's objective to continue providing lessees with practical relief as they are faced with significant disruptions related to the Covid-19 pandemic.

Considering the current developments, it appears that the proposed date of 30 June 2022 might be appropriate for preparers with operations in those countries where a large majority of the population is expected to be vaccinated by the end of 2021. However, this would not be the case for preparers with operations in many other countries where large scale vaccinations may not be completed until 2022 or beyond. As new strains of the virus arise as a result of mutation and the roll-out of vaccines may be impacted by huge demand worldwide, it is quite possible that significant disruption arising from the Covid-19 pandemic could last longer than expected and, thus, rent concessions could be granted in many countries beyond 30 June 2022.

Therefore, I suggest that the Board considers extending the date beyond 30 June 2022 in order to reduce the likelihood of further amendments (for example, 30 June or 31 December 2023) or, alternatively, remove a specific date in paragraph 46B(b) and instead rely on the requirement that the eligible rent concession occurs as a direct consequence of the Covid-19 pandemic as specified in paragraph 46B. If the Board decides to remove a specific date, we would suggest that the Board to provides further guidance on how entities should assess whether a rent concession occurs as a direct consequence of the Covid-19 pandemic. If the Board decides to keep a specific date for paragraph 46B(b), the Board will need to monitor the situation and may need to further extend the scope of the condition in a timely manner while also considering another set of transition provisions.

- b) I agree on the proposed effective date of amendment and also for retrospective amendment
- c) As regards Para 28F of IND AS 8 I don't agree with the view of the board. Every Company should give information for better understanding of readers of financial statement and comparison with others who don't apply this practical expedient
- d) As regards para C20BC contracts that became eligible for practical expedient otherwise this would lead to lot of judgments and ambiguities.

Regards

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