

Disclosure Agenda Paper 2A

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Purpose

Agenda Consultation 2011

 'Many respondents think that a disclosure framework is needed to ensure that information disclosed is more relevant to investors and to reduce the burden on preparers'

The IASB decided to host a Discussion Forum

- Explore
 opportunities to see
 how disclosures can
 be improved and
 simplified within the
 existing disclosure
 requirements
- Foster dialogue between preparers, auditors, regulators, users of financial statements and standard-setters
- Get a clearer picture of the 'disclosure problem' and its causes

Survey on disclosures launched

- In conjunction with the Discussion Forum
- To gain a clearer picture of the 'disclosure problem' in advance of the Discussion Forum



Disclosure Survey

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Survey preliminary analysis

- 225 responses to the survey
- Approximately
 - 50% preparers
 - 20% users
 - 30% other (includes regulators, auditors, industry organisations)
- Initial analysis focused on users and preparers
- There is a disclosure problem (over 80% agree)
- Preparers and users view the problem differently



Survey preliminary analysis

Preliminary Survey Results

Users' View Preparers' View Generic Poor communication language Disclosure overload **Immaterial** Not enough information relevant information



Discussion Forum

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Discussion Forum

- Held on 28 January 2013
- Over 120 external attendees at the Discussion Forum on disclosures, plus:
 - About 40 external people listened to the morning webcast
 - About 25 external people listened to the afternoon webcast
- A further 29 IASB members/staff attended



Discussion Forum—what we heard

- No clear agreement on what the disclosure problem is
- Preparers and investors do agree that financial reports are an important communication tool.
 - Preparers want to tell a story and investors want to hear their story (business model)
 - There are impediments. The objectives of the IASB, the auditors and regulators are appropriate and beneficial, but there is a perception that:
 - Standards—compel, rather than guide
 - Auditors—compliance rather than communication
 - Regulators—compliance rather than communication



Discussion Forum—what we heard

- Materiality
 - Application in practice is a challenge
 - The IASB has a responsibility to provide more guidance
 - Onus rests on the preparer to rebut a presumption that information should be disclosed
 - Linking back to the disclosure objective or the business model might help
- Better linkage is required
 - Linked information throughout report (context)
 - Policies, risks and the related financial information



Discussion Forum—what we heard

- Form matters
 - The order matters ... importance
 - The IASB should not constrain preparers
- Technology could help
 - Tension between communication and comparability
- Scope of financial reporting
 - Integrated reporting
 - Country-by-country reporting



But ...

- There are some legal and institutional barriers
- The line of least resistance is to simply disclose
- The cost of a failure to disclose is high
- The incentives are not right



Next steps

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Feedback statement

- We published a Feedback Statement on the survey and Discussion Forum in May 2013.
 - Summary of other work performed (by other bodies)
 - Survey results
 - Plenary presentation summaries
 - Panel discussion summary
 - Next steps



Possible next steps

- Amendments to IAS 1 (September 2013)
 - Materiality
 - Emphasise problems of presenting irrelevant information
 - Clarify that materiality applied to the main statements and notes
 - Clarify that materiality applies within a Standard
 - Presentation order
 - Accounting policies
 - Addressing investor and preparer 'concerns'
- Materiality (H2 2013)
 - Consider whether we should develop Application Guidance or Education Material
 - Work with securities regulators and Auditors (IAASB)



Possible next steps

- Drafting of disclosure requirements '... an entity shall ...' (on-going)
- Broader review of disclosure requirements (Start in 2013)
 - Start a research project with the goal of replacing our financial statement presentation and disclosure Standards with one consolidated IFRS – effectively a disclosure framework
 - We would draw on work already undertaken in the suspended Financial Statement Presentation project
 - We would develop a Discussion or Research Paper, in time to provide input into the next Agenda Consultation
 - Review all existing disclosure requirements, standard by standard.



Questions



