# Staff paper

Agenda reference: 9

**IFRS® Interpretations Committee meeting**

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| Date | **November 2026** |
| Project | **Management-defined Performance Measures—Public Communications (IFRS 18)** |
| Topic | **Comment letters on tentative agenda decision** |
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## Introduction

1. At its June 2026 meeting, the IFRS Interpretations Committee (Committee) published a tentative agenda decision in response to a question about whether presentations provided on a confidential basis to a small number of identifiable shareholders or potential investors are public communications for the purpose of identifying a management-defined performance measure (MPM) applying IFRS 18 *Presentation and Disclosure in Financial Statements*.

2. The objective of this paper is:

   (a) to summarise and analyse comments on the tentative agenda decision; and

   (b) to ask the Committee whether it agrees with our recommendation to finalise the agenda decision.

## Structure of this paper

3. This paper includes:

   (a) background (paragraphs 4–8);

(b) summary of comment letters (paragraphs 9–11);

(c) staff analysis (paragraphs 12–27);

(d) staff recommendation and questions for the Committee (paragraphs 28–29);

(e) Appendix A—suggested wording of the agenda decision; and

(f) Appendix B—other comments.

## Background

4. The submission described a fact pattern in which:

(a) a private entity prepares and shares presentations (including pitch materials) with a small number of identifiable shareholders or potential investors. The presentations contain performance measures that could otherwise meet the definition of an MPM;

(b) the presentations are shared under agreements that require confidentiality and prevent redistribution of the presentations to other parties; and

(c) the presentations are not published online, included in press releases, distributed to analysts, or otherwise made accessible to a broader or undefined external audience.

5. The submission asked whether those presentations are ‘public communications’ as described in paragraph 117 of IFRS 18, which contains the definition of an MPM. That paragraph states:

> A management-defined performance measure is a subtotal of income and expenses that (see paragraphs B113–B122):
>
> (a) an entity uses in public communications outside financial statements;
>
> …

6. To help entities assess whether a communication is a public communication, paragraph B119 of IFRS 18 lists particular communications that 'public communications' include and exclude. Paragraph B119 of IFRS 18 states (emphasis added):

> A subtotal meets the definition of a management-defined performance measure only if an entity uses it in public communications outside its financial statements. *Public communications include management commentary, press releases and investor presentations*. For the purpose of defining management-defined performance measures, public communications exclude oral communications, written transcripts of oral communications and social media posts.

7. The Committee:

   (a) observed that the reference to 'investor presentations' in paragraph B119 of IFRS 18 should not be read to mean that all presentations provided to investors are public communications.

   (b) noted that an entity applies judgement in assessing whether a particular communication is a public communication.

   (c) concluded that the presentations described in the fact pattern are not public communications for the purposes of identifying an MPM applying IFRS 18.

8. Based on its analysis, the Committee concluded that the principles and requirements in IFRS 18 provide an adequate basis for the entity to assess whether the presentations described in the fact pattern are public communications as described in IFRS 18. Consequently, the Committee decided that a standard-setting project is not needed and it instead published a tentative agenda decision.

## Summary of the comment letters

9. The Committee received 13 comment letters by the comment letter deadline. All comment letters received, including any late comment letters, are available on our website.[1] This agenda paper includes analysis of only the comment letters received by the comment letter deadline.

10. Of the 13 respondents:

    (a) nine agree—or do not disagree—with the Committee's conclusion and tentative decision that a standard-setting project is not needed for the reasons set out in the tentative agenda decision.

    (b) three—all from Brazil—disagree with the Committee's analysis and conclusion. These respondents say whether a particular communication is a public communication is not a matter for an entity's judgement but rather a matter determined by the applicable securities laws and regulations. They suggest changing the agenda decision to reflect their view or recommend undertaking standard-setting if the Committee does not share their view.

    (c) one respondent does not explicitly agree or disagree with the Committee's analysis and conclusions but provides their own analysis and views on whether particular documents are public communications.

11. Three of the respondents that agree with the Committee's conclusion nonetheless suggest some changes to clarify the tentative agenda decision.

## Staff analysis

12. This section analyses:

    (a) role of securities laws and regulations (paragraphs 14–25); and

    (b) clarification suggestions (paragraphs 26–27).

[1] At the date of posting this agenda paper, there were no late comment letters.

13. Appendix B contains analysis of other comments from respondents. We recommend no action and no changes to the agenda decision in respect of those comments.

### *Role of securities laws and regulations*

#### *Feedback*

14. The Brazilian national standard-setter, Comitê de Pronunciamentos Contábeis (CPC), Brazilian securities regulator, Comissão De Valores Mobiliários (CVM) and Renata Bandeira disagree with the Committee's analysis and conclusion.

15. In particular, these respondents disagree with the statement in the tentative agenda decision 'that an entity applies judgement in assessing whether a particular communication is a public communication'. In their view, assessing whether a communication is a public communication is a matter determined by the applicable securities laws and regulations.

16. These respondents say the reference in paragraph BC335 of the Basis for Conclusions on IFRS 18 (reproduced in paragraph 23) to an entity's compliance with laws and regulations supports their view. CPC says their view is further supported by:

    (a) the reference in paragraph B129(a) of IFRS 18 contemplating a subtotal that 'is required in a public communication by law or regulation' as a basis for rebutting the presumption in paragraph 119 of IFRS 18 that a subtotal of income and expenses used in public communications outside financial statements communicates to users of financial statements management's view of an aspect of financial performance of the entity as a whole.

    (b) paragraph B131 using an example of a subtotal 'required by a regulator' to illustrate when a subtotal might become, or cease to be, an MPM.

17. CPC and Renata Bandeira provide additional context on securities law in Brazil, explaining that in Brazil, securities law categorises communications as either public (in which case information is needed to be provided to all market participants) or

private (in which case the selected receivers of information are required by law to keep it confidential).

18. CPC and Renata Bandeira also provide comments on our analysis in Agenda Paper 3 to the June 2026 Committee meeting (June agenda paper) about why the International Accounting Standards Board (IASB) decided not to define 'public communications'. In particular, those respondents raise concerns about our reference to 'common understandings' of 'public' in paragraph 20(b) the June agenda paper.

19. These respondents suggest amending the tentative agenda decision to reflect their view by saying, for example, that:

    (a) an entity assesses whether a communication is public primarily by reference to how that communication is characterised and regulated under the securities laws and regulations it is subject to—including rules for private or restricted capital raisings and confidentiality restrictions attached to the communication; and

    (b) a communication lawfully made on a private, confidential or restricted basis under those rules is not a public communication for purposes of paragraph 117(a) of IFRS 18.

20. Those respondents say that if the Committee does not agree with their analysis, the Committee should refer the matter to the IASB for standard-setting.

*Staff analysis*

21. IFRS 18 uses 'public communications' as part of the definition of an MPM (see paragraph 5 of this paper). Paragraphs B119–B122 of IFRS 18 include application guidance describing how an entity assesses 'public communications'. Those paragraphs provide no definition of 'public communications' but provide examples of communications included in and excluded from 'public communications'.

22. We continue to agree with the Committee that an entity applies judgement in assessing whether a particular communication is a public communication. While we

accept that securities laws and regulations affect an entity's assessment of whether a communication is a public communication, there is no basis to state that an entity assesses whether a communication is a public communication only (or primarily) by reference to how that communication is characterised and regulated under the securities laws and regulations to which it is subject. We note:

(a) paragraphs B119–B122 of IFRS 18 (which describe how to assess public communications) do not directly refer to securities laws and regulations.

(b) the examples of communications that are not public communications for the purpose of IFRS 18 (for example, oral communications and written transcripts of oral communications) could, from our understanding, be considered public communications applying securities laws and regulations in some jurisdictions.

(c) paragraphs B129(a) and B131 of IFRS 18 discuss situations in which a regulator requires an entity to include specific subtotals in its public communications but do not provide requirements as to what a public communication is.

23. Paragraph BC335 of the Basis for Conclusions on IFRS 18 discusses the IASB's considerations of how laws and regulations affect an entity's assessment of whether a communication is a public communication. Paragraph BC335 states:

> Some stakeholders raised concerns that 'public communications' is not defined and could be interpreted broadly, making it onerous for an entity (and auditors and regulators) to identify all publicly communicated measures. However, the IASB observed that an entity actively decides how it communicates publicly and the performance measures it includes in those communications. An entity usually has systems and processes in place to monitor and control its communications to comply with laws and regulations restricting the type and timing of information permitted to be provided to the market—for example, to prevent unfair

advantages arising from communicating such information to different parties at different times.

24. The tentative agenda decision quotes the relevant portion of paragraph BC335 of the Basis for Conclusions on IFRS 18 that highlights how laws and regulations affect an entity's assessment of whether a communication is a public communication. We think further change or clarification is unnecessary. We also note the tentative agenda decision makes no reference to common understandings of the term 'public' as discussed in paragraph 20(b) of the June Agenda Paper.

25. We also see no basis for referring this matter to the IASB. In particular:

(a) based on our analysis, we continue to agree with the Committee's conclusion that IFRS 18 provides an adequate basis for an entity to assess whether the presentations described in the fact pattern are public communications for the purpose of identifying an MPM applying IFRS 18. Consequently, we agree with the Committee decision that a standard-setting project is not needed to address the matter.

(b) as evidenced by paragraph BC335 of the Basis for Conclusions on IFRS 18, the IASB considered during the development of IFRS 18 feedback on whether to define 'public communications' and the interaction with securities laws in an entity's jurisdiction.

### *Suggestions to improve the clarity of the tentative agenda decision*

#### *Feedback*

26. The Saudi Organization for Chartered and Professional Accountants (SOCPA) and Forvis Mazars both suggest the Committee explicitly explain its rationale for the conclusion that the communications in the fact pattern in the submission are not public communications. SOCPA suggests explaining that the conclusion is based on the combination of the facts described. Forvis Mazars says the agenda decision could, for example, clarify that the communication is not a public communication 'because it

is directed to a limited group of stakeholders rather than being made available to all shareholders or to a broader group of users'.

*Staff analysis*

27. We think no change is necessary in respect of the suggestions for the reasons considered by the Committee. In particular, in deciding to include a conclusion on the fact pattern in the tentative agenda decision, Committee members considered but decided it was unnecessary to include a rationale for their conclusion because all aspects of the fact pattern are relevant to the conclusion.

## Staff recommendation and questions for the Committee

28. Based on our analysis in this paper, we recommend finalising the agenda decision with no changes to the wording of the tentative agenda decision other than to remove the square brackets indicating the tentative stage of the agenda decision and a minor editorial change. Appendix A to this paper sets out the suggested wording for the agenda decision.

29. If the Committee agrees with our recommendation, we will ask the IASB whether it objects to the agenda decision at the first IASB meeting at which it is practicable to present the agenda decision.

| Questions for the Committee |
| --- |
| 1. Does the Committee agree with our recommendation to finalise the agenda decision as explained in paragraph 28 of this paper?<br>2. Do Committee members have any comments on the suggested wording of the agenda decision in Appendix A to this paper?<br>3. Do Committee members have additional observations they would like to report to the IASB regarding this matter? |

## Appendix A—Suggested wording of the agenda decision

This appendix sets out the suggested wording of the agenda decision. Paragraph numbers are included to facilitate referencing but will be removed when the agenda decision is published in IFRIC *Update*. New text is underlined and deleted text is struck through.

## Management-defined Performance Measures—Public Communications (IFRS 18 *Presentation and Disclosure in Financial Statements*)

A1. The Committee received a request asking whether presentations provided on a confidential basis to a small number of identifiable shareholders or potential investors are public communications for the purpose of identifying a management-defined performance measure applying IFRS 18.

### *Fact pattern*

A2. The request described a fact pattern in which:

(a) a private entity prepares and shares presentations (including pitch materials) with a small number of identifiable shareholders or potential investors. The presentations contain performance measures that could otherwise meet the definition of a management-defined performance measure;

(b) the presentations are shared under agreements that require confidentiality and prevent redistribution of the presentations to other parties; and

(c) the presentations are not published online, included in press releases, distributed to analysts, or otherwise made accessible to a broader or undefined external audience.

### *Applying the requirements in IFRS 18*

A3. Paragraph 117 of IFRS 18 contains the definition of a management-defined performance measure. Part (a) of the definition states that to be a management-defined

performance measure, a subtotal of income and expenses must be used 'in public communications outside financial statements'.

A4. To help entities assess whether a communication is a public communication, paragraph B119 of IFRS 18 lists particular communications that 'public communications' include and exclude. The Committee observed that the reference to 'investor presentations' in paragraph B119 of IFRS 18 should not be read to mean that all presentations provided to investors are public communications.

A5. The Committee noted that an entity applies judgement in assessing whether a particular communication is a public communication. In paragraph BC335 of the Basis for Conclusions on ~~accompanying~~ IFRS 18, the IASB observed that 'an entity actively decides how it communicates publicly and the performance measures it includes in those communications. An entity usually has systems and processes in place to monitor and control its communications to comply with laws and regulations restricting the type and timing of information permitted to be provided to the market…'.

A6. The Committee concluded that the presentations described in the fact pattern are not public communications for the purposes of identifying a management-defined performance measure applying IFRS 18.

### *Conclusion*

A7. The Committee concluded that the principles and requirements in IFRS 18 provide an adequate basis for the entity to assess whether the presentations described in the fact pattern are public communications for the purpose of identifying a management-defined performance measure applying IFRS 18. Consequently, the Committee ~~[~~decided~~]~~ that a standard-setting project is not needed to address the request.

## Appendix B—Other comments

B1. The following table summarises other comments, together with our analysis of those comments, raised by CPA Australia that apply to all the tentative agenda decisions on IFRS 18 *Presentation and Disclosure in Financial Statements*.

| Respondent's comment | Staff analysis and conclusion |
|---|---|
| *1. Clarify that each agenda decision is specific to a fact pattern*<br><br>CPA Australia says the fact patterns considered in the tentative agenda decisions are highly specific, and preparers and other stakeholders should therefore be careful not to draw broader conclusions without first assessing whether their own specific facts and circumstances align with those addressed in an agenda decision. | *We recommend no further action.*<br><br>We agree with the respondent's comment—and think it is already clear that stakeholders should consider each agenda decision in the light of the fact pattern and question addressed in that agenda decision. |
| *2. Implementation support for IFRS 18*<br><br>CPA Australia says the number of application questions received by the Committee on IFRS 18 indicates that preparers are identifying a broad range of practical challenges in applying that Standard.<br><br>The respondent encourages the IASB, working with the Committee, to adopt a more holistic approach to developing and issuing further implementation support for preparers, including guidance that | *We recommend no further action.*<br><br>It is not unusual for stakeholders to identify and submit application questions to the Committee as they work through the requirements of a new or amended IFRS Accounting Standard. The Committee's experience with application questions on IFRS 18 is not inconsistent with its experience on application questions on other IFRS Accounting Standards as stakeholders worked through the requirements of those Standards (for example, IFRS 15 |

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| explains the overarching principles in IFRS 18, and how they apply across a broader range of circumstances, to help reduce the risk of inconsistent interpretation and application. The respondent says the final and tentative agenda decisions issued to date should inform additional guidance and illustrative examples that support more consistent application of IFRS 18. | *Revenue from Contracts with Customers* and IFRS 16 *Leases*).<br><br>We note that:<br><br>(a) for almost all questions considered by the Committee on IFRS 18, it has concluded that the Standard provides an adequate basis for determining the appropriate accounting and that standard-setting is not needed.<br><br>(b) in accordance with the IFRS Foundation's *Due Process Handbook*, for each matter received about the application of IFRS Accounting Standards (including IFRS 18), the Committee considers whether a standard-setting project is needed to address the matter and whether to report any additional information about the matter to the IASB. The IASB is provided with an update after each Committee meeting. |