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Comments on the proposed improvements on the IFRS

IAS 1; Presentation of financial statements

Classification of a liability component of a convertible instrument

We agree with the Board's intention that liabilities be classified based on requirements to transfer cash or other assets rather than on settlement. However, in our view the amendment that has been made to paragraph 60d should also be made to 60a and 60c".

IAS 8; Accounting Policies, Changes in Accounting Estimates

Status of implementation guidance

The clarification proposed by the Board on the status of implementation guidance applies to all the standards and hence should not be included only in IAS 8. We propose that this be included in the preface to IFRS.

IAS 10; Events after the reporting period

The proposed amendment to paragraph 13 does not clearly explain the reasons for not recognizing these dividends as a liability. There are two forms of obligations recognized; legal & constructive. The paragraph identifies lack of "obligation" as the reason for no such recognition. We suggest that paragraph 13 be amended to read "no obligation (legal or constructive) exists at that time", to avoid any ambiguity.

IAS 16; Property, plant & equipment

Sale of assets held for rental

The proposal to include as part of revenue the proceeds from the sale of assets held for rental is welcomed as it will aid users in clearly evaluating the entity's past results and their projection of future cash flows.

Given this amendment IAS 40; *Investment Property*, should be amended to clarify whether or not the sale proceeds of investment property should also be considered as revenue in accordance with IAS 18.

We look forward to the issuance of the amended standards.

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