



Association pour la participation des  
entreprises françaises à l'harmonisation  
comptable internationale



IASB  
30 Cannon Street  
London EC4M 6XH  
UK

March 16, 2015

Dear Mr Hoogervorst,

**Re: ED/2014/5 Classification and measurement of share-based payment transactions**

We are pleased to have the opportunity to respond to the exposure draft Classification and measurement of share-based payment transactions (the ED).

We agree with all amendments proposed as we believe that these are pragmatic answers to concerns that have been raised. However we also believe that, given the high volume of implementation issues that the IASB and IFRS Interpretations Committee (IFRIC) has had to deal with in relation to this standard, a more comprehensive review of IFRS 2 is now essential.

Concerning the proposed transition provisions, while we agree with not mandating the application of the amendments retrospectively, we are concerned that no clear explanation is given of what prospective application means in the context of these proposals.

The definition provided in IAS 8 paragraph 5 implies that the amendment is applied only to transactions or other events and conditions occurring after the date as at which the policy is changed. That means that the new policy should not be applied to outstanding transactions which arose before the effective date.

However, the IFRIC has recently proposed, for uncertain tax positions, to require a prospective application, but for new and outstanding positions, with a cumulative effect in retained earnings at the start of the reporting period in which an entity first applies the new interpretation.

We therefore wonder how the IASB envisages prospective application in the case of amendments proposed to IFRS 2? Does it mean that the amendments would apply only to new plans or also to all outstanding plans?

We believe that the Board should clearly specify its intentions for this set of amendments and in future proposals always be explicit about exactly what it means by “prospective” application in the context of each amendment.

If you have any questions or need for further information, please do not hesitate to contact us.

Yours sincerely,

ACTEO

Patrice MARTEAU  
Chairman



AFEP

François SOULMAGNON  
Director General



MEDEF

Agnès LEPINAY  
Director of economic  
and financial affairs

