

IASB's ED on Management Commentary

Question 1: The IASB's approach to the subject of MC - Do you agree with the Board's decision to develop a guidance document for the preparation of management commentary instead of an IFRS? If not, why not?

Yes, because a non-mandatory guidance will permit an entity's management to make its own judgement about the aspects to report in order to put its business into the correct context to be useful to different users.

Question 2: Content elements - Do you agree that the content elements described in paragraph 24-39 are necessary for the preparation of a decision - useful management commentary? If not, how should those content elements be changed to provide decision useful information to users of financial reports?

Yes, we agree that the content elements are useful for the preparation of the management commentary and with the principles basis they are based on, but we agree with EFRAG as to the aspect that there should be a focus upon the information objectives rather than a list of information to be provided.

Question 3: Application guidance and illustrative examples - Do you agree with the Board's decision not to include detailed application guidance and illustrative examples in the final management commentary guidance document? If not, what specific guidance would you include and why?

Yes, we agree with the Board's decision.

Additional Observations made by EFRAG

We agree with the additional comments made by EFRAG regarding:

- The lacking of requests by IASB about the proposals of the ED (§ 8-23)
- The focus of MC on paragraph 11 on the needs of existing and potential capital providers without taking into account other groups of users.

Lisbon, 06th January 2009