

DISCUSSION PAPER: NON-EXCHANGE TRANSFERS A ROLE FOR SOCIETAL BENEFIT?

Q1.1 Do you agree that NETs have differentiating characteristics that warrant the development of a specific accounting treatment?

Yes, we agree.

Q2.1 Do you agree with how the scope has been defined? If not, is there a different scope that would provide a better basis for developing a comprehensive approach?

Yes, we agree.

Q2.2 Is the definition of NETs and the guidance around the assessment of their existence sufficiently clear and operational?

Yes, we agree.

Q2.3 Do you agree with the proposed exclusions from the project? In particular, do you think that the approach could be fit also for income taxes?

Yes, we agree with the proposed exclusions, including the exclusion for income taxes.

Q3.1 Which of the methods presented in paragraph 2.11 do you support, and why?

We support method 2.11 c) because we believe that NETs must be separately recognized in order to provide the most relevant information.

Q4.1 Which of the approaches presented in paragraph 3.13 do you support, and why?

We support approach 3.13 b) because it provides information in line with substance over legal form

Q5.1 Do you agree with the outcome? And do you believe that the notion of 'societal benefit' provides a conceptually adequate basis to support the outcome?

Yes, we agree.

Q6.1 Do you think that the recognition of expense-generating and income-generating transfers should be subject to a symmetrical or asymmetrical approach? Please explain your answer.

We support the asymmetrical approach (4.12 b)) because we believe that the conceptual framework should be respected.

Lisbon, 30th April 2019

