

The Swedish Financial Reporting Board

RFR-rs 2015:03

International Accounting Standards Board
30 Cannon Street
London EC4M 6 XH
United Kingdom

Dear Sirs,

**Re: IASB Exposure Draft ED/2014/6 Disclosure Initiative -
Proposed amendments to IAS 7**

The Swedish Financial Reporting Board is responding to your invitation to comment on the Exposure Draft Disclosure Initiative - Proposed amendments to IAS 7.

We support the IASB's proposal to introduce an additional disclosure requirement on reconciliation of cash flows from financing activities. We believe this will assist users in deriving the information they seek. However, we believe that the IASB should consider whether such a disclosure requirement is relevant and meaningful for financial institutions.

We do not support the proposal to introduce further disclosures about restrictions on cash and cash equivalents, as we do not believe that these amendments sufficiently improve information about an entity's cash position and liquidity risk beyond the disclosures already mandated in paragraphs 48-49 of IAS 7. We do not believe that these amendments imply benefits in terms of information about liquidity risk that justify the costs.

Finally, regarding the presentation of the proposed amendments on the IFRS taxonomy, we believe that the XBRL issue is an important issue which should be treated in full in its own right and not reduced to a technical exercise dealt with piecemeal related to individual standards or even minor amendments of these. Because of this we are not commenting on the proposals for changes in taxonomy.



Rådet **för** **finansiell rapportering**

If you have any questions concerning our comments please address our Executive member Claes Janzon by e-mail to: claes.janzon@radetforfinansiellrapportering.se.

Stockholm, 30 March 2015

Yours sincerely,



Anders Ullberg
Chairman