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Belgium

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E-Mail info@drsc.de

Berlin, 28 August 2009

Dear Stig,

### **EFRAG'S ASSESSMENTS OF AMENDMENTS TO IFRS 2 "GROUP CASH-SETTLED SHARE-BASED PAYMENT TRANSACTIONS"**

On behalf of the German Accounting Standards Board (GASB) I am writing to comment on EFRAG's Assessments of Amendments to IFRS 2 *Group Cash-settled Share-based Payment Transactions*.

We agree with the views set out in the assessment. As a national standard-setter we are not in a position to answer the questions regarding the costs that will arise for preparers and for users to implement the amendment and the interpretation. We therefore sent your assessment to the DAX30 entities, but we only got feedback from three companies listed in the DAX30.

As attachment to this letter you will find our comments to the above mentioned EFRAG's assessments. The comments as provided by two companies listed in the DAX30 have been made available to you. One company would like to remain anonymous. However, they also support EFRAG's assessments.

If you have any further questions, please do not hesitate to contact me.

Yours sincerely,

Liesel Knorr  
*President*

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Vorstandsausschuss:

Heinz-Joachim Neubürger (Vorsitzender), Prof. Dr. Helmut Perlet (Stellvertreter),  
Prof. Dr. Rolf Nonnenmacher (Schatzmeister), Dr. Kurt Bock, Dr. Werner Brandt

**INVITATION TO COMMENT ON THE EFRAG'S ASSESSMENTS OF AMENDMENTS TO IFRS 2 "GROUP CASH-SETTLED SHARE-BASED PAYMENT TRANSACTIONS"**

Comments should be sent to [commentletter@efrag.org](mailto:commentletter@efrag.org) or uploaded via our website by 4 September 2009

EFRAG has been asked by the European Commission to provide it with advice and supporting material on the Amendments to IFRS 2 *Group Cash-settled Share-based Payment Transactions* ("the Amendments"). In order to do that, EFRAG has been carrying out a technical assessment of the Amendments against the criteria for endorsement set out in Regulation (EC) No 1606/2002 and has also been assessing the costs and benefits that would arise from their implementation in the EU.

A summary of the Amendments is set out in Appendix 1.

Before finalising its two assessments, EFRAG would welcome your views on the issues set out below. Please note that all responses received will be placed on the public record unless the respondent requests confidentiality. In the interest of transparency EFRAG will wish to discuss the responses it receives in a public meeting, so we would prefer to be able to publish all the responses received.

1 Please provide the following details about yourself:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

German Accounting Standards Board (GASB)

- (b) Are you/Is your organisation or company a:

Preparer       User       Other (please specify)

Standard Setter

- (c) Please provide a short description of your activity/the general activity of your organisation or company:

(d) Country where you/your organisation or company is located:

Germany

(e) Contact details including e-mail address:

Liesel Knorr

Zimmerstr. 30, 10969 Berlin, Germany

knorr@drsc.de

2 EFRAG’s initial assessment of the Amendments is that they meet the technical criteria for endorsement. In other words, they are not contrary to the true and fair principle and they meet the criteria of understandability, relevance, reliability and comparability. EFRAG’s reasoning is set out in Appendix 2.

(a) Do you agree with this assessment?

Yes

No

If you do not, please explain why you do not agree and what you believe the implications of this should be for EFRAG’s endorsement advice.

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(b) Are there any issues that are not mentioned in Appendix 2 that you believe EFRAG should take into account in its technical evaluation of the Amendments? If there are, what are those issues and why do you believe they are relevant to the evaluation?

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3 EFRAG is also assessing the costs that will arise for preparers and for users to implement the Amendments, both in year one and in subsequent years. Some initial work has been carried out, and the responses to this Invitation to Comment will be used to complete the assessment.

The results of the initial assessment are set out in Appendix 3. To summarise, EFRAG’s initial assessment (see Appendix 3, paragraphs 8 and 9) is that the Amendments are:

(a) likely to involve preparers in incurring only insignificant incremental ongoing and virtually no day one costs; and

(b) likely to involve users in no year one or ongoing incremental costs.

Do you agree with this assessment?

Yes  No

If you do not, please explain why you do not and (if possible) explain broadly what you believe the costs involved will be?

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- 4 EFRAG’s initial assessment is that the Amendments are likely to result in improvements in the relevance and comparability of the information provided—although that benefit will be greatest in the case of entities preparing separate financial statements in accordance with IFRS—and will also benefit preparers by reducing uncertainty as to whether and how to apply IFRS 2. EFRAG’s initial assessment is that overall the benefits to be derived from applying the Amendments will exceed the costs involved (Appendix 3, paragraphs 10 - 13).

Do you agree with this assessment?

Yes  No

If you do not, please explain why you do not and what you think the implications should be for EFRAG’s endorsement advice?

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- 5 EFRAG is not aware of any other factors that should be taken into account in reaching a decision as to what endorsement advice it should give the European Commission on the Amendments.

Do you agree that there are no other factors?

Yes  No

If you do not, please explain why you do not and what you think the implications should be for EFRAG’s endorsement advice?

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1 Please provide the following details about yourself:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

\_\_\_\_\_  
Gerhard Faupel

\_\_\_\_\_  
Beiersdorf AG Hamburg

- (b) Are you/Is your organisation or company a:

X  Preparer       User       Other (please specify)

- (c) Please provide a short description of your activity/the general activity of your organisation or company:

\_\_\_\_\_  
Cosmetic Industrie

*Amendments to IFRS 2 – Invitation to Comment on the EFRAG’s initial assessments*

(d) Country where you/your organisation or company is located:

Germany

(e) Contact details including e-mail address:

Unnastr. 48

20245 Hamburg

Gerhard.Faupel@beiersdorf.com

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Yes                       No

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Yes                       No

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1 Please provide the following details about yourself:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

Deutsche Bank AG

Theodor-Heuss-Allee 70

60486 Frankfurt, Germany

- (b) Are you/Is your organisation or company a:

Preparer       User       Other (please specify)

- (c) Please provide a short description of your activity/the general activity of your organisation or company:

Banking / Financial Services



*Amendments to IFRS 2 – Invitation to Comment on the EFRAG’s initial assessments*

(d) Country where you/your organisation or company is located:

Germany

(e) Contact details including e-mail address:

Dr. Wolfgang Weber

Address see above

wolfgang.weber@db.com

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Yes

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(b) Are there any issues that are not mentioned in Appendix 2 that you believe EFRAG should take into account in its technical evaluation of the Amendments? If there are, what are those issues and why do you believe they are relevant to the evaluation?

n/a

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