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## DSR – öffentliche SITZUNGSUNTERLAGE

|                     |   |
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| <b>DSR-Sitzung:</b> | <b>142. / 25.03.2009 / 13:15 – 15:15 Uhr</b>                  |
| <b>TOP:</b>         | <b>04 – Financial Instruments: Impairment</b>                 |
| <b>Thema:</b>       | <b>Abgleich der Anhangangaben im ED/2009/12 und in IFRS 7</b> |
| <b>Papier:</b>      | <b>142_04b_Disclosures Abgleich ED und IFRS 7</b>             |

### Ausgangspunkt

- 1 Der DSR hat in seiner 138. Sitzung am 4. Dezember 2009 den Exposure Draft ED/2009/12 *Financial Instruments: Amortised Cost and Impairment* erstmals erörtert. Im Hinblick auf die darin enthaltenen Vorschläge für erforderliche Anhangangaben wurde geäußert, dass diese als sehr umfangreich anzusehen sind und im wesentlichen Unternehmen aus dem Finanzsektor im Blick haben. Daneben wurde angemerkt, dass diese Anhangangaben zum Teil schon vom derzeitigen IFRS 7 gefordert werden bzw. sich mit den dort vorgesehenen Angaben überschneiden. Daher wurde der Projektverantwortliche beauftragt, einen Abgleich der im Exposure Draft und im IFRS geforderten Anhangangaben zu erstellen.
- 2 Dieser im Folgenden dargestellte Abgleich orientiert sich an der Reihenfolge der im Exposure Draft vorgeschlagenen Anhangangaben und stellt diesen die – sofern vorhanden – entsprechenden Regelungen des IFRS 7 gegenüber.



## Classes of financial instruments and level of disclosure

- 3 Für Zwecke der im Exposure Draft geforderten Anhangangaben sind die zu fortgeführten Anschaffungskosten bilanzierten Finanzinstrumente in Klassen einzuteilen, für die die Angaben jeweils getrennt zu erfolgen haben. Dabei hat ein Unternehmen die Finanzinstrumente so in Klassen einzuordnen, dass diese der Art der geforderten Informationen angemessen sind und den Eigenschaften dieser Finanzinstrumente Rechnung tragen.
- 4 Der Wortlaut im Exposure Draft ist dabei fast identisch mit den entsprechenden Vorschriften in IFRS 7. Die entsprechenden Original-Textstellen sind nachfolgend aufgeführt.

| ED/2009/12  |  | IFRS 7   |
|---|--|--|
| 14 When this [draft] IFRS requires disclosures by class of financial asset or financial liability, an entity shall group financial instruments into classes that are appropriate to the nature of the information disclosed and that take into account the characteristics of those financial instruments. An entity shall provide sufficient information to permit reconciliation to the line items presented in the statement of financial position.              |  | 6 When this IFRS requires disclosures by class of financial instrument, an entity shall group financial instruments into classes that are appropriate to the nature of the information disclosed and that take into account the characteristics of those financial instruments. An entity shall provide sufficient information to permit reconciliation to the line items presented in the statement of financial position.  |
| B20 Paragraph 14 requires an entity to group financial instruments into classes that are appropriate to the nature of the information disclosed and that take into account the characteristics of those financial instruments. These classes are determined by the entity and are, thus, distinct from the measurement categories of financial instruments (which determine how financial instruments are measured and where changes in fair value are recognised). |  | B1 Paragraph 6 requires an entity to group financial instruments into classes that are appropriate to the nature of the information disclosed and that take into account the characteristics of those financial instruments. The classes described in paragraph 6 are determined by the entity and are, thus, distinct from the categories of financial instruments specified in IAS 39 (which determine how financial instruments are measured and where changes in fair value are recognised). |
|   |  | B2 In determining classes of financial instrument, an entity shall, at a minimum: <ul style="list-style-type: none"> <li>(a) distinguish instruments measured at amortised cost from those measured at fair value.</li> <li>(b) treat as a separate class or classes those financial instruments outside the scope of this IFRS.</li> </ul>  |



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| <p>B21 An entity decides, in the light of its circumstances, how much detail it provides to satisfy the requirements of this [draft] IFRS, how much emphasis it places on different aspects of the requirements and how it aggregates information to display the overall picture without combining information with different characteristics. It is necessary to strike a balance between overburdening financial statements with excessive detail that may not assist users of financial statements and obscuring important information as a result of too much aggregation. For example, an entity shall not obscure important information by including it among a large amount of insignificant detail. Similarly, an entity shall not disclose information that is so aggregated that it obscures important differences between individual transactions or associated risks.</p> |  | <p>B3 An entity decides, in the light of its circumstances, how much detail it provides to satisfy the requirements of this IFRS, how much emphasis it places on different aspects of the requirements and how it aggregates information to display the overall picture without combining information with different characteristics. It is necessary to strike a balance between overburdening financial statements with excessive detail that may not assist users of financial statements and obscuring important information as a result of too much aggregation. For example, an entity shall not obscure important information by including it among a large amount of insignificant detail. Similarly, an entity shall not disclose information that is so aggregated that it obscures important differences between individual transactions or associated risks.</p> |
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### **Allowance account**

- 5 Der Exposure Draft sieht die verpflichtende Anwendung eines Wertberichtigungskontos vor. Zur Darstellung der Veränderungen in diesem Konto während des Berichtszeitraums ist eine Überleitungsrechnung anzugeben.
- 6 Die derzeitigen Vorschriften in IAS 39 sehen keine Verpflichtung zur Anwendung eines Wertberichtigungskontos vor. Sofern ein Unternehmen jedoch (freiwillig) ein solches Konto benutzt, sieht IFRS 7 zusätzliche Angaben vor, die denen im Exposure Draft im Grundsatz entsprechen. Im Exposure Draft ist dabei die geforderte Überleitungsrechnung durch die Auflistung verpflichtender Mindestbestandteile detaillierter spezifiziert.



7 Nachfolgend finden sich die entsprechenden Original-Textstellen.

| ED/2009/12   |  | IFRS 7  |
|--|--|---|
| <p>15 For financial assets measured at amortised cost an entity shall use an allowance account to account for credit losses. An entity shall disclose for each class of financial assets:</p> <p>(a) a reconciliation of changes in that account during the period; and</p> <p>(b) its <i>write-off</i> policy.</p>  |  | <p>16 When financial assets are impaired by credit losses and the entity records the impairment in a separate account (eg an allowance account used to record individual impairments or a similar account used to record a collective impairment of assets) rather than directly reducing the carrying amount of the asset, it shall disclose a reconciliation of changes in that account during the period for each class of financial assets.</p>   |
| <p>B22 The reconciliation of changes in the allowance account for credit losses shall reconcile the balances at the beginning and end of the period showing at a minimum:</p> <p>(a) increases resulting from the allocation of initial expected credit losses, ie amounts presented as a reduction of gross interest revenue in accordance with paragraph 13(b);</p> <p>(b) increases resulting from changes in estimates of expected credit losses, ie amounts included in the gains and losses presented in accordance with paragraph 13(d);</p> <p>(c) decreases resulting from changes in estimates of expected credit losses, ie amounts included in the gains and losses presented in accordance with paragraph 13(d); and</p> <p>(d) write-offs.</p> |  | <p>B5 Paragraph 21 requires disclosure of the measurement basis (or bases) used in preparing the financial statements and the other accounting policies used that are relevant to an understanding of the financial statements. For financial instruments, such disclosure may include:</p> <p>...</p> <p>(d) when an allowance account is used to reduce the carrying amount of financial assets impaired by credit losses:</p> <p>(i) the criteria for determining when the carrying amount of impaired financial assets is reduced directly (or, in the case of a reversal of a write-down, increased directly) and when the allowance account is used; and</p> <p>(ii) the criteria for writing off amounts charged to the allowance account against the carrying amount of impaired financial assets (see paragraph 16).</p> |
| <p>B23 An entity shall include all write-offs in the reconciliation of changes in the allowance account (ie on a gross basis as both an addition to and a use of the allowance account). This applies even if a financial asset becomes impaired and is written off in the same period. Hence, direct write-offs against the contractual amount of financial assets without using an allowance account are prohibited.</p>   |  |   |



## Credit quality of financial assets

- 8 Der Exposure Draft enthält eine Definition des Begriffs „notleidend“ (non-performing) und verlangt entsprechende Anhangangaben über notleidende finanzielle Vermögenswerte und deren Veränderungen während des Berichtszeitraums.
- 9 Der IFRS 7 sieht umfangreiche Angabepflichten zu den Risiken, die sich aus Finanzinstrumenten ergeben, vor. Ein explizit genanntes Risiko stellt dabei das Kreditrisiko dar. Im Rahmen dieses Risikofeldes werden auch Angaben zu finanziellen Vermögenswerten, die überfällig (*past due*) oder wertgemindert sind, gefordert.
- 10 Die unter die Angabepflichten des Exposure Draft fallenden finanziellen Vermögenswerte stellen eine Teilmenge der von IFRS 7.37 erfassten finanziellen Vermögenswerte dar, für die zusätzliche – hinsichtlich Information über die Kreditqualität ähnliche (und daher redundante?) – Angaben zu machen sind.
- 11 Die entsprechenden Original-Textstellen sind nachfolgend aufgeführt.

| ED/2009/12  |  | IFRS 7  |
|---|--|---|
| <b>Appendix A<br/>Defined terms</b><br>...<br><b>non-performing</b> The status of a financial asset that is more than 90 days past due or is considered uncollectible.  |  | <b>Appendix A<br/>Defined terms</b><br>...<br><b>past due</b> A financial asset is past due when a counterparty has failed to make a payment when contractually due.  |
| 21 For financial assets measured at amortised cost an entity shall disclose for each class of financial assets: <ul style="list-style-type: none"> <li>(a) a reconciliation of changes in <i>non-performing</i> financial assets during the period; and</li> <li>(b) a qualitative analysis of the interaction between changes in non-performing financial assets and changes in the allowance account if that interaction is significant.</li> </ul> |  | <i>Financial assets that are either past due or impaired</i><br>37 An entity shall disclose by class of financial asset: <ul style="list-style-type: none"> <li>(a) an analysis of the age of financial assets that are past due as at the end of the reporting period but not impaired;</li> <li>(b) an analysis of financial assets that are individually determined to be impaired as at the end of the reporting period, including the factors the entity considered in determining that they are impaired; and</li> <li>(c) for the amounts disclosed in (a) and (b), a description of collateral held by</li> </ul> |



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|     |   | the entity as security and other credit enhancements and, unless impracticable, an estimate of their fair value. |
| B27 | The reconciliation of changes in non-performing financial assets shall reconcile the nominal amounts at the beginning and end of the period showing at a minimum:<br><br>(a) increases resulting from reclassifications of performing loans as non-performing (ie deterioration of credit quality);<br><br>(b) increases resulting from acquisition of non-performing loans;<br><br>(c) decreases resulting from recoveries through enforcing securities;<br><br>(d) decreases resulting from recoveries due to payments of the debtor;<br><br>(e) renegotiations; and<br><br>(f) write-offs. |  |
| B28 | The qualitative analysis of the interaction between changes in non-performing financial assets and changes in the allowance account is a narrative explanation of how the two types of changes relate to each other and any common causes of the changes.   |  |

### Origination and maturity (vintage) information

- 12 Der Exposure Draft verlangt Angaben zum Ursprung und zur Fälligkeit von finanziellen Vermögenswerten in einer verknüpften Darstellung (vorgeschlagen wird eine Matrix), damit das mit bestimmten Jahrgängen verbundene Kreditrisiko besser beurteilt werden kann. Die Angaben haben dabei auf Basis der Nominalbeträge zu erfolgen.
- 13 Der IFRS 7 erfordert grundsätzlich keine Angaben zum Ursprung und zur Fälligkeit von finanziellen Vermögenswerten. Lediglich in bestimmten Einzelfällen ist im Rahmen der Angaben zum Liquiditätsrisiko eine Restlaufzeitenanalyse für finanzielle Vermögenswerte, die zur Steuerung des Liquiditätsrisikos gehalten werden, vorzunehmen.

14 Nur in den genannten Einzelfällen kommt es für eine Teilmenge der finanziellen Vermögenswerte zu einer doppelten Angabe von Informationen zu deren Fälligkeit/Restlaufzeit.

15 Nachfolgend finden sich die entsprechenden Original-Textstellen.

| ED/2009/12  |           | IFRS 7   |           |           |           |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
|---|-----------|--|-----------|-----------|-----------|-------|-------|------|------|------|----|----|----|----|----------|--|--|--|--|--|------|----|----|----|--|----|------|----|----|----|----|----|------|----|----|----|----|----|------|--|----|----|----|----|------|--|----|--|----|----|------|--|--|--|----|----|-------|-----------|-----------|-----------|-----------|-----------|--|--|
| <p>22 For financial assets measured at amortised cost an entity shall disclose for each class of financial assets information showing the year of origination and the year of maturity (vintage information).</p>   |           | <p><b>Liquidity risk</b></p> <p>39 An entity shall disclose:</p> <p>(a) a maturity analysis for non-derivative financial liabilities (including issued financial guarantee contracts) that shows the remaining contractual maturities.</p> <p>(b) a maturity analysis for derivative financial liabilities. The maturity analysis shall include the remaining contractual maturities for those derivative financial liabilities for which contractual maturities are essential for an understanding of the timing of the cash flows (see paragraph B11B).</p> <p>(c) a description of how it manages the liquidity risk inherent in (a) and (b).</p> |           |           |           |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| <p>B29 The information showing the year of origination and maturity shall be provided:</p> <p>(a) on the basis of nominal amounts; and</p> <p>(b) in tabular format (an example of a possible format is provided below).</p> <table border="1" data-bbox="263 1478 750 1881"> <thead> <tr> <th rowspan="3"></th> <th colspan="4">Year of origination</th> <th rowspan="3">Total</th> </tr> <tr> <th>20X1</th> <th>20X2</th> <th>20X3</th> <th>20X4</th> </tr> <tr> <th>CU</th> <th>CU</th> <th>CU</th> <th>CU</th> </tr> </thead> <tbody> <tr> <td>Maturity</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>20X3</td> <td>xx</td> <td>xx</td> <td>xx</td> <td></td> <td>zz</td> </tr> <tr> <td>20X4</td> <td>xx</td> <td>xx</td> <td>xx</td> <td>xx</td> <td>zz</td> </tr> <tr> <td>20X5</td> <td>xx</td> <td>xx</td> <td>xx</td> <td>xx</td> <td>zz</td> </tr> <tr> <td>20X6</td> <td></td> <td>xx</td> <td>xx</td> <td>xx</td> <td>zz</td> </tr> <tr> <td>20X7</td> <td></td> <td>xx</td> <td></td> <td>xx</td> <td>zz</td> </tr> <tr> <td>20X8</td> <td></td> <td></td> <td></td> <td>xx</td> <td>zz</td> </tr> <tr> <td>Total</td> <td><u>zz</u></td> <td><u>zz</u></td> <td><u>zz</u></td> <td><u>zz</u></td> <td><u>zz</u></td> </tr> </tbody> </table> |           | Year of origination  |           |           |           | Total | 20X1  | 20X2 | 20X3 | 20X4 | CU | CU | CU | CU | Maturity |  |  |  |  |  | 20X3 | xx | xx | xx |  | zz | 20X4 | xx | xx | xx | xx | zz | 20X5 | xx | xx | xx | xx | zz | 20X6 |  | xx | xx | xx | zz | 20X7 |  | xx |  | xx | zz | 20X8 |  |  |  | xx | zz | Total | <u>zz</u> | <u>zz</u> | <u>zz</u> | <u>zz</u> | <u>zz</u> |  | <p>B11E Paragraph 39(c) requires an entity to describe how it manages the liquidity risk inherent in the items disclosed in the quantitative disclosures required in paragraph 39(a) and (b). An entity shall disclose a maturity analysis of financial assets it holds for managing liquidity risk (eg financial assets that are readily saleable or expected to generate cash inflows to meet cash outflows on financial liabilities), if that information is necessary to enable users of its financial statements to evaluate the nature and extent of liquidity risk.</p> |
|   |           | Year of origination  |           |           |           |       | Total |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
|   |           | 20X1   | 20X2      | 20X3      | 20X4      |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
|   | CU        | CU   | CU        | CU        |           |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| Maturity  |           |  |           |           |           |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| 20X3  | xx        | xx   | xx        |           | zz        |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| 20X4  | xx        | xx   | xx        | xx        | zz        |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| 20X5  | xx        | xx   | xx        | xx        | zz        |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| 20X6  |           | xx   | xx        | xx        | zz        |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| 20X7  |           | xx   |           | xx        | zz        |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| 20X8  |           |  |           | xx        | zz        |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |
| Total   | <u>zz</u> | <u>zz</u>  | <u>zz</u> | <u>zz</u> | <u>zz</u> |       |       |      |      |      |    |    |    |    |          |  |  |  |  |  |      |    |    |    |  |    |      |    |    |    |    |    |      |    |    |    |    |    |      |  |    |    |    |    |      |  |    |  |    |    |      |  |  |  |    |    |       |           |           |           |           |           |  |  |