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### **Adoption of IFRIC 8 *Scope of IFRS 2***

Dear Stig,

We agree with your positive advice to the European Commission on adopting IFRIC 8 *Scope of IFRS 2*.

The German Accounting Standards Board (GASB) and the Accounting Interpretation Committee (AIC) welcome the IFRIC's aim to support the IASB in establishing and improving International Financial Reporting Standards. The GASB agrees that guidance is needed if IFRS 2 has to be applied for arrangements where an entity makes share-based payments for apparently nil or inadequate consideration.

Although we were rather disappointed that the concerns raised by the AIC, the EFRAG and others in their respective comment letters to IFRIC D16 regarding the unclear formulation in para. 9 and the potentially misleading Illustrative Example have not been addressed in the final Interpretation IFRIC 8, we do not consider these reservations to be of such a weight that the endorsement advice should be affected by them.

The GASB concluded that the Interpretation meets the requirements of the Regulation (EC) No 1606/2002 of the European Parliament and of the Council and therefore recommends the endorsement of IFRIC 8 *Scope of IFRS 2*.

If you would like any clarification of these comments please do not hesitate to contact me.

Yours sincerely,

*Prof. Dr. Harald Wiedmann*

President

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