AASB Standard

AASB 10XX XX XXXX

General Purpose Financial Statements – Not-for-Profit Private Sector Tier 3 Entities





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BASIS FOR CONCLUSIONS

[Draft] Australian Accounting Standard AASB 10XX General Purpose Financial Statements – Not-for-Profit Private Sector Tier 3 Entities is set out in paragraphs 1.1–29.23 and Appendices A–C. All the paragraphs have equal authority. AASB 10XX is to be read in the context of other Australian Accounting Standards as set out in paragraph 1.3. In the absence of explicit guidance, Section 9 Accounting Policies, Estimates and Errors provides a basis for selecting and applying accounting policies.



Preface

Introduction

The Australian Accounting Standards Board (AASB) develops, issues and maintains Australian Accounting Standards, including Interpretations. The AASB is a Commonwealth entity under the *Australian Securities and Investments Commission Act* 2001.

AASB 1057 Application of Australian Accounting Standards identifies the application of Standards to entities and financial statements. AASB 1053 Application of Tiers of Australian Accounting Standards establishes a differential reporting framework consisting of three tiers of reporting requirements for preparing general purpose financial statements.

Main features of this [draft] Standard

Background

[to be developed]

Main requirements

This Standard sets out new, separate recognition, measurement, presentation and disclosure requirements for a new tier of reporting requirements (Tier 3), which is applicable to certain not-for-profit private sector entities. This Standard has been developed through applying a new approach and principles based on considering preparer costs and the information needs of users of general purpose financial statements to determine the modified recognition, measurement, presentation and disclosure requirements that are appropriate for smaller not-for-profit private sector entities that are not publicly accountable and are not prohibited from applying this Standard by the relevant legislation, constituting document or other document (Tier 3 entities). The approach and principles applied are outlined in the Basis for Conclusions accompanying this Standard.

This Standard does not specify which entities are permitted to apply Tier 3 reporting requirements. That is a matter for regulatory authorities to determine. The recognition, measurement, presentation and disclosure requirements that are relevant to general purpose financial statements of Tier 3 entities are set out in this separate Standard.

Application date

This Standard applies to annual reporting periods beginning on or after ... [date] (see paragraph B1). Earlier application is permitted.

[Draft] Accounting Standard AASB 10XX

The Australian Accounting Standards Board makes Accounting Standard AASB 10XX General Purpose Financial Statements – Not-for-Profit Private Sector Tier 3 Entities under section 334 of the Corporations Act 2001.

Dated ... [date]

Keith Kendall Chair – AASB

[Draft] Accounting Standard AASB 10XX General Purpose Financial Statements – Not-for-Profit Private Sector Tier 3 Entities

Notes to Board members

Staff have made amendments to Section 1 to reflect the following 3 July 2025 AASB meeting decisions:

- Paragraph 1.2 to clarify that NPF private sector entities without public accountability and are not prohibited from applying Tier 3 reporting requirements by the relevant legislative, constituting document or other document shall, as a minimum, apply the Tier 3 Standard.
- Paragraph 1.3 to clarify that the requirements of the topic-based Standards apply only to those specified transactions, events and other conditions for transactions within the Standard's scope.

Section 1: Objective, Scope and Application

Objective

1.1 The objective of this Standard is to specify proportionate, simplified financial reporting requirements for general purpose financial statements prepared by Tier 3 entities, to require the reporting of useful, consistent and transparent information by those entities in a manner that achieves an appropriate balance of costs and benefits.

Scope of this Standard

1.2 Not-for-profit private sector entities without public accountability that are not prohibited from applying Tier 3 reporting requirements by the relevant legislation, constituting document or other document shall, as a minimum, apply Tier 3: Australian Accounting Standards – Simplified Accounting reporting requirements under AASB 1053 *Application of Tiers of Australian Accounting Standards*. These entities may elect to apply Tier 1 or Tier 2 reporting requirements in their entirety, instead of Tier 3 reporting requirements, in preparing general purpose financial statements.

Application of this Standard

- 1.3 A not-for-profit private sector entity that applies the Tier 3 reporting requirements under AASB 1053 shall apply this Standard. In addition, the entity shall apply the recording, measurement, presentation and transition requirements of the following Australian Accounting Standards, and any related disclosure requirements (other than transition) in AASB 1060 General Purpose Financial Statements Simplified Disclosures for For-Profit and Not-for-Profit Tier 2 Entities:
 - (a) AASB 2 Share-based Payment (July 2015), in relation to share-based payment arrangements;
 - (b) AASB 17 *Insurance Contracts* (July 2017), in relation to insurance contracts issued by the entity;
 - (c) AASB 5 Non-current Assets Held for Sale and Discontinued Operations (August 2015), in relation to non-current assets held for sale except for:
 - (i) financial assets within the scope of Section 10 of this Standard; and
 - (ii) investment properties measured using the fair value model in Section 14 of this Standard;
 - (d) AASB 6 Exploration for and Evaluation of Mineral Resources (August 2015), in relation to exploration for, and evaluation of, mineral resources;

- (e) AASB 9 *Financial Instruments* (December 2014) and other applicable Australian Accounting Standards, in relation to the financial instruments listed in paragraph 10.4 of this Standard;
- (f) AASB 119 *Employee Benefits* (August 2015), in relation to obligations arising under a defined benefit plan; and
- (g) AASB 141 *Agriculture* (August 2015), in relation to biological assets except for bearer plants, and agricultural produce at the point of harvest.

Commencement of the legislative instrument

1.4 For legal purposes, this legislative instrument commences on ... [date].

Question 1 to Board members

As mentioned in Agenda Paper 5.3 for the Board's 3 July 2025 meeting, staff developed Sections 2-7 of the Tier 3 Standard based on AASB 1060, including the titles of the financial statements. As noted in the notes to the Board below, in this draft staff have made several suggested amendments to the titles of financial statements, using AASB 101 and AASB 1060 as a reference.

However, staff are cognisant that the Board is currently seeking stakeholders' views on aligning AASB 1060 with AASB 18 via ITC 56 Post-implementation Review of Tier 2 and the Removal of Special Purpose Financial Statements for Certain For-Profit Private Sector Entities and Further Update of Tier 2. Considering that AASB 1060 may likely change in the foreseeable future and potentially before a Tier 3 Standard becomes effective, staff consider it would be helpful if the Tier 3 Standard aligns the titles of the financial statements with those used by Tier 1 and Tier 2 entities. For example, AASB 18 refers to "a statement (or statements) of financial performance for the reporting period" rather than "a statement of profit or loss and other comprehensive income". Staff consider that aligning at least the title will promote consistency and clarity for users of Tier 3 financial statements. Accordingly, staff recommend that the titles of the financial statements in the Tier 3 Standard be aligned with those used in AASB 18. If the Board agrees with the staff recommendation, staff will bring those changes for the Board to consider at the next meeting in Q1 2026.

Do Board members agree with the staff recommendation to align the titles of the financial statements in the Tier 3 Standard with those used in AASB 18? If not, what do Board members suggest?

Notes to Board members

As mentioned in <u>Agenda Paper 5.3</u> for the Board's 3 July 2025 meeting, a few stakeholders who commented on ED 335 noted that the language expressed in Sections 3 – 7 could be expressed better and shortened. Prompted by the stakeholder comments, staff identified some requirements that potentially are unclear or mutually inconsistent and re-examined ED 335 to identify where text could be amended to use simpler, plainer English and ensure mutual consistency between requirements. The amendments made include:

- Paragraph 2.7 staff have amended the disclosure requirement by reverting it to the disclosure specified by AASB 1060.15, which only requires an entity that does not prepare financial statements on a going concern basis to disclose that fact.
- Paragraph 2.17 staff noted that "unless ... this Standard" was out of sequence and references to 'gross amounts' and 'separate' transactions/balances in para. 2.17 could be ambiguous or confusing. Moreover, staff note that the corresponding paragraph of AASB 1060 (para. 24) is much briefer. Staff suggest retaining the first sentence of paragraph 2.17 (consistent with para. A27 of the New Zealand Tier 3 Standard) but otherwise aligning with para. 24 of AASB 1060, which states: "An entity shall not offset assets and liabilities or income and expenses, unless required or permitted by an Australian Accounting Standard."
- Paragraph 2.19(b) staff have amended this paragraph to be clearer. AASB 18 was used as a reference.
- Paragraph 2.25 staff have amended the disclosure requirement by reverting it to the disclosure specified by AASB 1060.31(b), which is broader than the disclosure exposed (as, for example, it suggests that an entity should disclose that the financial statements include equity-accounted associates). Staff suggest making this change as the ED 335 disclosure is otherwise a duplicate of the disclosure specified in section 8.

Section 2: Financial Statement Presentation

Scope of this section

2.1 This section explains fair presentation of financial statements, what compliance with this Standard requires and what a complete set of financial statements is.

Fair presentation

2.2 Financial statements shall present fairly the financial position, financial performance and cash flows of an entity. Fair presentation requires the faithful representation of the effects of transactions, other events and conditions in accordance with the definitions and recognition (recording) criteria for assets, liabilities, income and expenses set out in the *Conceptual Framework for Financial Reporting* (as identified in AASB 1048 *Interpretation of Standards*) (*Conceptual Framework*). The application of the recording, measurement, presentation and disclosure requirements in this Standard, with additional disclosure when necessary, is presumed to result in financial statements that achieve a fair presentation of the financial position, financial performance and cash flows of Tier 3 entities. The additional disclosures referred to above are necessary when compliance with the specific requirements in this Standard is insufficient to enable users of the financial statements to understand the effects of particular transactions, other events and conditions on the entity's financial position, financial performance and cash flows.

Compliance with this Standard

- 2.3 An entity whose financial statements comply with the recording, measurement, presentation and disclosure requirements in this Standard shall make an explicit and unreserved statement of such compliance in the notes. Financial statements shall not be described as complying with this Standard unless they comply with all these requirements.
- 2.4 An entity shall disclose in the notes:
 - (a) the statutory basis or other reporting framework, if any, under which the financial statements are prepared; and
 - (b) that it is a not-for-profit entity.
- 2.5 Even if an entity's management considers that compliance with a requirement in this Standard would be misleading, entities applying this Standard shall not depart from any of its requirements. In the extremely rare circumstances in which management concludes that compliance with a requirement in this Standard would be so misleading that it would conflict with the objective of financial statements set out in the *Conceptual Framework*, the entity shall, to the maximum extent possible, reduce the perceived misleading aspects of compliance by disclosing:
 - (a) the nature of the requirement in this Standard and the reason why management has concluded that complying with that requirement is so misleading in the circumstances that it conflicts with the objective of financial statements set out in the *Conceptual Framework*; and
 - (b) for each period presented, the adjustments to each item in the financial statements that management has concluded would be necessary to achieve a fair presentation.

Going concern

When preparing financial statements, an entity's management shall assess the entity's ability and willingness to continue as a going concern. An entity is a going concern unless management either intends to liquidate the entity or to cease its operations, or has no realistic alternative to doing so. In assessing whether the going concern assumption is appropriate, management takes into account all information available about the future, looking forward at least twelve months from the end of the reporting period.

Disclosures of material uncertainties affecting the going concern assumption

2.7 When management is aware of material uncertainties about future events or conditions that might cast significant doubt upon the entity's ability or willingness to continue as a going concern, the entity shall disclose those uncertainties. When an entity does not prepare financial statements on a going concern basis, it shall also disclose:

- (a) that fact, together with the reason(s) why it is not regarded as a going concern; and
- (b) the basis on which the financial statements were prepared.
- 2.8 The effect of a change in an entity's ability to continue as a going concern on the amounts of the entity's assets and liabilities at the end of the reporting period will depend upon the entity's particular circumstances. For example, that effect will depend upon whether operations are to be transferred to another entity, sold in an orderly manner or liquidated in a rushed sale. Judgement is required in determining whether a change in the carrying amounts of assets and liabilities is required. It is also necessary to consider whether the change in circumstances leads to additional liabilities or triggers clauses in debt contracts that will lead to the reclassification of those debts as current liabilities.

Frequency of reporting

- 2.9 An entity shall present a complete set of financial statements (including comparative information see paragraph 2.12) at least annually. When the end of an entity's reporting period changes and the annual financial statements are presented for a period longer or shorter than one year, the entity shall disclose the following:
 - (a) that fact;
 - (b) the reason for using a longer or shorter period; and
 - (c) the fact that comparative amounts presented in the financial statements (including the related notes) are not entirely comparable.

Consistency of presentation

- 2.10 An entity shall retain the presentation and classification of items in the financial statements from one period to the next unless:
 - (a) it is apparent, following a significant change in the nature of the entity's operations or a review of its financial statements, that another presentation or classification would be more appropriate having regard to the criteria for the selection and application of accounting policies in Section 9; or
 - (b) this Standard requires a change in presentation or classification.
- 2.11 When the presentation or classification of items in the financial statements is changed, an entity shall reclassify comparative amounts unless the reclassification is impracticable.

Comparative information

2.12 Except when this Standard permits or requires otherwise, an entity shall disclose comparative information for the previous comparable period for all amounts presented in the current period's financial statements. An entity shall include comparative information for narrative and descriptive information when it is relevant to an understanding of the current period's financial statements.

Materiality and aggregation

- 2.13 An entity shall present separately each material class of similar items. An entity shall present separately items of a dissimilar nature or function unless they are immaterial.
- When applying this Standard an entity shall decide, having regard to its circumstances, how it aggregates information in the financial statements, which include the notes. An entity shall not reduce the understandability of its financial statements by obscuring material information with immaterial information or by aggregating material items that have different natures or functions.
- 2.15 Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity. Materiality depends on the nature or magnitude of information, or both. An entity assesses whether information, either individually or in combination with other information, is material in the context of its financial statements taken as a whole.
- 2.16 This Standard specifies information that is required to be included in the financial statements, which include the notes. An entity need not provide a specific disclosure if the information resulting from that disclosure is not material. This is the case even if this Standard contains a list of specific requirements or describes them as minimum requirements.

Offsetting

- 2.17 Users of financial statements should be given as much relevant information as possible about an entity's transactions and balances. Therefore, unless required or permitted to do so by this Standard, an entity shall not offset assets and liabilities or income and expenses.
- 2.18 The following practices do not involve offsetting:
 - (a) measuring assets net of valuation adjustments such as obsolescence or impairment write-downs of items of inventory or property, plant and equipment;
 - (b) netting amounts due from and payable to the same counterparty if the entity is legally entitled to settle the amounts on a net basis;
 - (c) presenting a gain or loss on the sale of an item of property, plant and equipment or investment by deducting from the asset's sale consideration the asset's carrying amount and related selling expenses; and
 - (d) presenting on a net basis gains and losses arising from transactions or other events of a similar nature (eg foreign exchange gains and losses).

Complete set of financial statements

- 2.19 A complete set of financial statements includes:
 - (a) a statement of financial position as at the reporting date;
 - (b) a statement (or statements) of profit or loss and other comprehensive income for the reporting period, presented as either:
 - a single statement with profit or loss and other comprehensive income presented in two sections. If this option is chosen, the profit or loss section is presented first, followed by the other comprehensive income section; or
 - (ii) a separate statement of profit or loss and a separate statement of comprehensive income. If this option is chosen, the statement of comprehensive income begins with profit or loss, followed by the items of other comprehensive income:
 - (c) a statement of changes in equity for the reporting period;
 - (d) a statement of cash flows for the reporting period; and
 - (e) notes, comprising material accounting policy information and other explanatory information.
- 2.20 If the only changes to equity during the periods for which financial statements are presented arise from profit or loss, corrections of prior period errors and changes in accounting policy, the entity may present a single statement of income and retained earnings in place of the statement of profit or loss and other comprehensive income and statement of changes in equity (see paragraph 5.4).
- 2.21 If an entity has no items of other comprehensive income in any of the periods for which financial statements are presented, it may present only a statement of profit or loss or it may present a statement of profit or loss and other comprehensive income in which the 'bottom line' is labelled 'profit or loss'.
- 2.22 Because paragraph 2.12 requires comparative amounts in respect of the previous period for all amounts presented in the financial statements, a complete set of financial statements means that an entity shall present, as a minimum, two of each of the required financial statements and related notes.
- 2.23 In a complete set of financial statements, an entity shall present each financial statement with equal prominence.
- 2.24 An entity may use titles for the financial statements other than those used in this Standard as long as they are not misleading. For example, an entity may use 'statement of surplus or deficit' instead of 'statement of profit or loss'.

Identification of the financial statements

- An entity shall clearly identify each of the financial statements and the notes and distinguish them from other information in the same document. In addition, an entity shall display the following information prominently and repeat it when necessary for an understanding of the information presented:
 - (a) the name of the reporting entity and any change in its name since the end of the preceding reporting period;

- (b) whether the financial statements cover the individual entity or a group of entities;
- (c) the reporting date and the period covered by the financial statements;
- (d) that the amounts in the financial statements are presented in Australian dollars; and
- (e) the level of rounding, if any, used in presenting amounts in the financial statements.
- 2.26 An entity shall disclose the following, if not disclosed elsewhere in information published with the financial statements:
 - (a) the domicile and legal form of the entity, its country of incorporation and the address of its registered office (or principal place of operations, if different from the registered office); and
 - (b) a description of the entity's primary purpose or mission and the nature of the entity's primary operations or activities.

Question 2 to Board members

On re-examination of the proposed requirements in ED 335, staff note that the presentation of line items in the statement of financial position in paragraph 3.2 only requires the presentation of an entity's investments in associates or joint ventures (paragraphs 3.2(h) and 3.2(i)) and does not include presentation requirements if an entity accounts for those investments as investments in notable relationship entities. As such, staff recommend adding a presentation requirement that an entity that accounts for investments in notable relationship entities shall present them as a line item instead of investments in associates and joint ventures, as referred to in paragraphs 3.2(h) and 3.2(i). The staff recommendation is reflected in paragraph 3.3 of this draft Standard.

Do Board members agree with the staff recommendation to add a requirement that an entity that accounts for investments in notable relationship entities shall present them as a line item instead of the investments referred to in paragraphs 3.2(h) and 3.2(i)? If not, what do Board members suggest?

Notes to Board members

Staff have made amendments to Section 3 to reflect the following 3 July 2025 AASB meeting decision:

Regarding the disclosures required about an entity's liabilities with covenants – to include the guidance from AASB 1060.47A in paragraph 3.10. Sub-paragraphs (a) and (b) were added to para. 3.10. In addition, the reference to the amount of the liabilities in the stem of para. 3.10 was omitted, consistent with the stem of para. 47A of AASB 1060, because the newly added sub-paragraph (a) includes a reference to 'the carrying amount of related liabilities'.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 3 are:

- Paragraph 3.8 was amended to better distinguish it from paragraph 3.2, by incorporating the subclassification examples from the related paragraph in AASB 1060 (AASB 1060.44).
- Removal of the disclosure specified in paragraph 3.10 of ED 335. This disclosure pertained to disclosures of
 forthcoming major disposals of assets (or assets and liabilities). Retaining this disclosure appeared inconsistent with
 the Board decision to require entities to apply AASB 5 for any non-current assets held for sale and make the relevant
 disclosures of AASB 1060. In addition, another factor in support of the removal is that this disclosure is not required
 of Tier 2 entities.

Section 3: Statement of Financial Position

Scope of this section

3.1 This section sets out the information to be presented in a statement of financial position and how to present it. The statement of financial position (sometimes called the balance sheet) presents an entity's assets, liabilities and equity as of a specific date – the reporting date.

Information to be presented in the statement of financial position

- 3.2 The statement of financial position shall include line items that present the following amounts when those amounts are material to an understanding of the entity's financial position:
 - (a) cash and cash equivalents;
 - (b) trade and other receivables ('debtors');

- (c) financial assets (excluding amounts shown under (a), (b), (h) and (i));
- (d) inventories;
- (e) property, plant and equipment;
- (f) investment property;
- (g) intangible assets;
- (h) investments in associates;
- (i) investments in joint ventures;
- (i) trade and other payables ('creditors');
- (k) financial liabilities (excluding amounts shown under (j) and (m));
- (1) liabilities and assets for current tax;
- (m) provisions;
- (n) non-controlling interests, presented within equity separately from the equity attributable to the owners of the parent; and
- (o) equity attributable to the owners of the parent.
- 3.3 An entity shall present additional line items, headings and subtotals in the statement of financial position when such presentation is relevant to an understanding of the entity's financial position. An entity that presents investments in notable relationship entities shall include this as a line item instead of amounts shown in 3.2(h) and 3.2(i).

Current/non-current distinction

3.4 An entity shall present current and non-current assets, and current and non-current liabilities, as separate classifications in its statement of financial position in accordance with paragraphs 3.5 and 3.6.

Current assets

- 3.5 An entity shall classify an asset as current when:
 - (a) it expects to convert the asset to cash (eg by selling it), or consume it, within twelve months after the reporting date;
 - (b) it holds the asset primarily for the purpose of trading; or
 - (c) the asset is cash or a cash equivalent, unless it is restricted from being exchanged or used to settle a liability for at least twelve months after the reporting date.

An entity shall classify all other assets as non-current.

Current liabilities

- 3.6 An entity shall classify a liability as current when:
 - (a) the liability is due to be settled within twelve months after the reporting date;
 - (b) it holds the liability primarily for the purpose of trading; or
 - (c) the entity does not have the right to defer settlement of the liability for at least twelve months after the reporting date.

An entity shall classify all other liabilities as non-current.

Sequencing and format of items in the statement of financial position

3.7 This Standard does not prescribe the sequence or format in which items are to be presented. In addition, the descriptions used and the sequencing of items or aggregation of similar items may be amended according to the nature of the entity and its transactions, to provide information relevant to an understanding of the entity's financial position.

Information to be presented in the statement of financial position or in the notes

- 3.8 An entity shall disclose, either in the statement of financial position or in the notes, further subclassifications of the line items presented when those amounts are material to an understanding of the entity's financial position, classified in a manner appropriate to the entity's operations. This includes, for example:
 - (a) for property, plant and equipment, classifications appropriate to the entity;
 - (b) for trade and other receivables, showing separately the amounts due from related parties from those due from other parties;(c) for inventories, showing separately amounts of inventories:
 - (i) held for sale or distribution in the ordinary course of operations;
 - (ii) in the process of production for such sale or distribution; and
 - (iii) in the form of materials or supplies to be consumed in the production process or in the rendering of services;
 - (d) for trade and other payables, showing separately amounts payable to trade suppliers from those payable to related parties;
 - (e) showing deferred revenue obligations separately from other liabilities;
 - (f) for provisions, showing separately provisions for employee benefits from other provisions; and
 - (g) disaggregating equity into its classes, such as contributed capital, retained earnings, reserves and items of income and expense that, as permitted or required by this Standard, are recorded in other comprehensive income and presented separately in equity (including any revaluation surplus).
- 3.9 An entity shall disclose the amount of contributed capital and changes in its amount during the period, and the rights and any restrictions attaching to contributed capital at the reporting date. These disclosures apply to entities with share capital and entities with any other form of contributed capital, such as partnerships or trusts.
- 3.10 In applying paragraph 3.6, if an entity classifies liabilities arising from loan arrangements as non-current although the entity's right to defer settlement of those liabilities is subject to the entity complying with covenants within twelve months after the reporting date, the entity shall disclose information in the notes that enables users of financial statements to understand the risk that the liabilities could become repayable within twelve months after the reporting date, including:
 - (a) information about the covenants (including the nature of the covenants and when the entity is required to comply with them) and the carrying amount of related liabilities; and
 - (b) any facts and circumstances that indicate the entity might have difficulty complying with the covenants for example, the entity having acted during or after the reporting period to avoid or mitigate a potential breach. Such facts and circumstances could also include the fact that the entity would not have complied with the covenants if they were to be assessed for compliance based on the entity's circumstances at the reporting date.

Question 3 to Board members

On re-examination of the proposed requirements in ED 335, similar to Question 2, staff note that the presentation of line items in the statement(s) of profit or loss and other comprehensive income in paragraph 4.6 only requires the presentation of an entity's share of the profit or loss and other comprehensive income of investments in associates and joint ventures accounted for using the equity method (paragraphs 4.6(c) and 4.6(g), respectively) and does not include presentation requirements if an entity accounts for those investments as investments in notable relationship entities. As such, staff recommend adding a presentation requirement that an entity that accounts for investments in notable relationship entities using the equity method shall present items of comprehensive income in respect of them as line items instead of items of comprehensive income in respect of investments in associates and joint ventures, as referred to in paragraphs 4.6(c) and 4.6(g).

Do Board members agree with the staff recommendation to add a requirement that an entity that accounts for investments in notable relationship entities using the equity method shall present items of comprehensive income in respect of them as line items instead of items of comprehensive income in respect of investments in associates and joint ventures, as referred to in paragraphs 4.6(c) and 4.6(g)? If not, what do Board members suggest?

Notes to Board members

Staff have made amendments to Section 4 to reflect the 3 July 2025 AASB meeting decision to permit the presentation of the analysis of expenses using a classification based on both the nature and function of expenses if this provides information that is the most useful structured summary of an entity's expenses as reflected in paragraphs 4.11 - 4.14.

In addition, staff have made amendments to the Section to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 4 are:

- Paragraphs 4.3 and 4.3(a) paragraph 4.3 was amended to bring more clarity to 'total' (in relation to comprehensive income) and better align with the definition provided in the glossary of terms. The reference in paragraph 4.3(a) to modified retrospective adjustments was amended simply to retrospective adjustments, which would encompass the different treatments of corrections of prior period errors and changes in accounting policies decided by the Board at its July 2025 meeting.
- Paragraph 4.4 (and 5.5) in developing ED 335, the Board decided that, in contrast to Tier 2 reporting requirements, a change between using the single-statement approach and two-statement approach to presenting profit or loss and other comprehensive income should not constitute a change in accounting policy. The Board viewed this as a form of simplification of the Tier 2 requirements. On reflection and to avoid potential differences in practice, staff think it would be useful for this position to be clearly stated in the Tier 3 Standard. Staff have similarly included a new requirement in Section 5 to apply this position also to a change between presenting a statement of income and retained earnings and presenting both a statement of profit or loss and other comprehensive income and a statement of changes in equity.
- Paragraph 4.6 and former para. 4.7 staff noted overlapping guidance in para. 4.3 and 4.7 of ED 335. In addition, paragraph 4.3(b) of ED 335– which states that items of other comprehensive income are reported outside profit or loss holds true regardless of whether a single-statement approach or two-statement approach is used (but, consistent with para. 51(b) of AASB 1060, was positioned under the heading 'Single-statement approach'). To improve the brevity of the draft Standard, staff broadened the scope of para. 4.3 of ED 335 to make that paragraph applicable to both a single-statement and a two-statement approach to presenting comprehensive income, and consequently omitted para. 4.7 of ED 335 from this draft Standard. Consistent therewith, staff moved the heading "Single-statement approach" from above paragraph 4.3 of ED 335 to now follow that paragraph.
- Paragraph 4.6(f)(i) and 4.6(f)(ii) have been removed as the draft Tier 3 Standard does not include any items of other comprehensive income that must be reclassified to profit or loss. Accordingly, staff concluded that retaining presentation requirements for grouping OCI items that cannot be recycled would not be useful.

Section 4: Statement of Profit or Loss and Other Comprehensive Income

Scope of this section

4.1 This section requires an entity to present its total comprehensive income for a reporting period – ie its financial performance for the period – across one or two financial statements. It sets out the information to be presented in those statements and how to present it.

Presentation of total comprehensive income

- 4.2 An entity shall present its total comprehensive income for a period either:
 - (a) in a single statement of profit or loss and other comprehensive income, in which case the statement presents all items of income and expense recorded in the period; or
 - (b) in two statements a statement of profit or loss and a statement of comprehensive income in which case the statement of profit or loss presents all items of income and expense recorded in the period except those that are recorded in total comprehensive income outside profit or loss as permitted or required by this Standard.
- 4.3 An entity's total comprehensive income for a reporting period is the change in equity during that period resulting from transactions and other events, other than those changes resulting from transactions with owners in their capacity as owners. It comprises all components of 'profit or loss' and of 'other comprehensive income'. This Standard provides different treatment of items of income and expense for the following circumstances:
 - (a) the effects of corrections of prior period errors and changes in accounting policies are presented as retrospective adjustments of prior periods instead of as part of the total comprehensive income for the current period (see Section 9); and
 - (b) items of other comprehensive income are recorded outside profit or loss when they arise.

4.4 A change between presenting total comprehensive income using the single-statement approach and the twostatement approach is not a change in accounting policy.

Single-statement approach

- 4.5 Under the single-statement approach, the statement of profit or loss and other comprehensive income shall include all items of income and expense recorded in a period unless this Standard requires otherwise.
- 4.6 An entity shall include, in the statement of profit or loss and other comprehensive income, line items that present the following amounts for the period when those amounts are material to an understanding of the entity's financial performance:
 - (a) revenue;
 - (b) finance costs;
 - (c) share of the profit or loss of investments in associates and joint ventures accounted for using the equity method or, where applicable, the share of the profit or loss of investments in notable relationship entities accounted for using the equity method;
 - (d) tax expense;
 - (e) profit or loss (if an entity has no items of other comprehensive income, this line need not be presented);
 - (f) each item of other comprehensive income classified by nature (excluding amounts in (g)).
 - (g) share of the other comprehensive income of associates and joint ventures accounted for using the equity method or, where applicable, the share of the other comprehensive income of notable relationship entities accounted for using the equity method; and
 - (h) total comprehensive income (if an entity has no items of other comprehensive income, it may use another term for this line, such as 'profit or loss').
- 4.7 An entity shall disclose separately the following items in the statement of profit or loss and other comprehensive income as allocations for the period:
 - (a) profit or loss for the period attributable to:
 - (i) non-controlling interests; and
 - (ii) owners of the parent; and
 - (b) total comprehensive income for the period attributable to:
 - (i) non-controlling interests; and
 - (ii) owners of the parent.

Two-statement approach

4.8 Under the two-statement approach, the statement of profit or loss shall display, as a minimum, line items that present the amounts in paragraph 4.6(a)–4.6(e) for the period, with profit or loss as the last line. The statement of comprehensive income shall begin with profit or loss as its first line and shall display, as a minimum, line items that present the amounts in paragraph 4.6(f)–4.6(h) and paragraph 4.7 for the period.

Requirements applicable to both approaches

- 4.9 An entity shall present additional line items, headings and subtotals in the statement of profit or loss and other comprehensive income when such presentation is relevant to an understanding of the entity's financial performance.
- 4.10 An entity shall not present or describe any items of income and expense as 'extraordinary items' in the statement of profit or loss and other comprehensive income or in the notes.

Structured summary of expenses

4.11 An entity shall present a structured summary of its expenses in the statement of profit or loss and other comprehensive income, or in the notes, classifying expenses by the nature of expenses or the function of expenses within the entity, or both, whichever way provides the most useful structured summary of its expenses.

Classification by nature of expense

(a) Under this method of classification, expenses are aggregated according to their nature (for example, depreciation, materials used, grants and donations made, transport costs, employee benefits, information technology support and advertising costs) and are not reallocated among various functions within the entity.

Classification by function of expense

- (b) Under this method of classification, expenses are aggregated according to their function as part of the costs of pursuing the entity's mission, for example, the costs of providing educational services, advice or other community services, the cost of sales and the costs of distribution or administrative activities.
- 4.12 In determining how to use the characteristics of nature and function to provide the most useful structured summary of expenses, an entity shall consider the main components and drivers of the entity's financial performance, how the entity's operations are managed and the classifications commonly used by entities in the same industry. An entity shall not classify expenses to a function if the allocation of expenses to that function would be so arbitrary that the amount presented would not provide a faithful representation of that function.
- 4.13 If an entity classifies and presents some expenses by nature and other expenses by function, it shall label the resulting items in a way that clearly identifies which expenses are included in each item presented. For example, if an entity includes some employee benefits in a function line item and other employee benefits in a nature line item, the label for the nature line item would clearly identify that it does not include all employee benefits (eg 'employee benefits excluding those included in cost of sales').
- 4.14 An entity that classifies and presents some or all expenses by function within the entity shall nonetheless disclose the items of expense that are required to be disclosed by other sections of this Standard (eg impairment losses).

Notes to Board members

Staff have made amendments to Section 5 to reflect the following 3 July 2025 AASB meeting decisions:

• Paragraph 5.3(b) was amended as marked up below to effect the Board's decision that corrections of prior period errors must be made on a fully retrospective basis.

In addition, staff have suggested amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 5 are:

- Paragraph 5.4 a sentence was added because it is insufficiently clear for smaller NFP entities that an entity has the option to present a single statement of income and retained earnings only if the changes in equity are confined to profit or loss and other movements in retained earnings. Therefore, although this presentation issue is not explained in AASB 1060, staff recommend clarifying this issue in the Tier 3 Standard, mentioning movements between reserves and changes in asset revaluation surplus as examples of disqualifying movements in equity.
- Paragraph 5.5 as noted in the text box preceding Section 4, this paragraph was added to clarify that a change between presenting a statement of income and retained earnings and presenting both a statement of profit or loss and other comprehensive income and a statement of changes in equity does not constitute a change in accounting policy.

Section 5: Statement of Changes in Equity and Statement of Income and Retained Earnings

Scope of this section

5.1 This section sets out requirements for presenting the changes in an entity's equity for a reporting period, either in a statement of changes in equity or, if the conditions specified in paragraph 5.4 are met and an entity so chooses, in a statement of income and retained earnings. It sets out the information to be presented in those statements and how to present it.

Statement of changes in equity

Purpose

5.2 The statement of changes in equity presents an entity's profit or loss for a reporting period, other comprehensive income for the period, the effects of changes in accounting policies and corrections of prior period errors, and the amounts of investments by, and distributions to, owners acting in their capacity as owners during the period.

Information to be presented in the statement of changes in equity

- 5.3 The statement of changes in equity shall include the following information:
 - (a) total comprehensive income for the period, showing separately the total amounts attributable to owners of the parent and to non-controlling interests;
 - (b) for each component of equity, the effects of retrospective application or retrospective restatement recorded in accordance with Section 9; and
 - (c) for each component of equity, a reconciliation between the carrying amount at the beginning and the end of the period, separately disclosing changes resulting from:
 - (i) profit or loss;
 - (ii) other comprehensive income; and
 - (iii) the amounts of contributions by owners acting in their capacity as owners, and changes in ownership interests in subsidiaries that do not result in a loss of control.

Statement of income and retained earnings

Purpose

- 5.4 The statement of income and retained earnings presents an entity's profit or loss and changes in retained earnings for a reporting period. Paragraph 2.20 permits an entity to present a statement of income and retained earnings in place of a statement of profit or loss and other comprehensive income and a statement of changes in equity if the only changes to its equity during the periods for which financial statements are presented arise from profit or loss, corrections of prior period errors and changes in accounting policy. Accordingly, an entity shall not present a statement of income and retained earnings if a transfer between classes of equity (eg between retained earnings and capital reserves) occurs, or items of other comprehensive income (eg a movement in asset revaluation surplus) are recorded, during the reporting period or any comparative period presented.
- 5.5 A change between presenting a statement of income and retained earnings and presenting both a statement of profit or loss and other comprehensive income and a statement of changes in equity is not a change in accounting policy.

Information to be presented in the statement of income and retained earnings

- 5.6 An entity shall present in the statement of income and retained earnings the information required by Section 4, and additionally:
 - (a) retained earnings as at the beginning of the reporting period;
 - (b) restatements of retained earnings for corrections of prior period errors;
 - (c) restatements of opening retained earnings for changes in accounting policy; and
 - (d) retained earnings as at the reporting date.

Notes to Board members

Staff have made amendments to Section 6 to reflect the following 3 July 2025 AASB meeting decisions:

- Paragraph 6.4(g) was amended as marked up below to effect the Board's decision to restrict the cash flows referred to, for alignment with paragraph 67 of AASB 1060.
- Paragraph 6.9 was amended by inserting 'relevant' before 'revenues and expenses'.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 6 are to:

- Paragraph 6.11 staff have included a requirement for the entity to disclose the major classes of gross cash receipts and gross cash payments arising from cash flows from other activities, consistent with the disclosure requirement for cash flows from operating activities presented using the direct method.
- Paragraph 6.17 this paragraph was amended to include, as sub-para. (a), the receipt of donated assets to provide a more common and NFP-context example of a non-cash transaction. It is consistent with para. G7.19(a) of Part 1 of the Exposure Draft of draft INPAS.

Section 6: Statement of Cash Flows

Scope of this section

6.1 This section sets out the information to be presented in a statement of cash flows and how to present it. The statement of cash flows provides information about the changes in cash and cash equivalents of an entity for a reporting period, showing separately changes from operating activities and changes from other activities.

Cash equivalents

6.2 Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and that are subject to an insignificant risk of changes in value. They include at-call deposits with banks, term deposit investments with a maturity not exceeding three months from their date of purchase and bank overdrafts that are repayable on demand and form an integral part of an entity's cash management.

Information to be presented in the statement of cash flows

6.3 An entity shall present a statement of cash flows that presents, at a minimum, cash flows for a reporting period classified by operating activities and other activities. Other activities comprise the entity's investing activities and financing activities. An entity may classify and present cash flows from investing activities separately from cash flows from financing activities instead of presenting cash flows from other activities.

Operating activities

- An entity's operating activities are its principal activities. Consequently, cash flows from operating activities generally result from the transactions and other events and conditions that enter into the determination of profit or loss. Examples of cash flows from operating activities are:
 - (a) cash receipts from grants and donations, excluding grants and donations that are restricted for the construction or other acquisition of long-term assets (eg property, plant and equipment);
 - (b) cash receipts from the sale of goods and the rendering of services;
 - (c) cash receipts from membership fees and subscriptions;
 - (d) cash payments to suppliers for goods and services;
 - (e) cash payments to and on behalf of employees;
 - (f) grants and donations paid to beneficiaries; and
 - (g) cash receipts from investments, and cash receipts and payments from loans, when those investments or loans are held for dealing or trading purposes.

Some transactions, such as the sale of a building, may give rise to a gain or loss included in profit or loss. However, the cash flows relating to such transactions are not typically cash flows from operating activities.

Other activities

- 6.5 Activities other than operating activities are:
 - (a) the acquisition and disposal of long-term assets and other investments not included in cash equivalents; and
 - (b) activities that result in changes in the size and composition of the contributed equity and borrowings of an entity.
- 6.6 Examples of cash flows arising from other activities are:
 - (a) cash payments to acquire or construct long-term assets such as property, plant and equipment;
 - (b) cash receipts from sales of long-term assets such as property, plant and equipment;
 - (c) cash payments to acquire equity or debt instruments of other entities and interests in joint ventures;
 - (d) cash receipts from sales of equity or debt instruments of other entities and interests in joint ventures;
 - (e) cash receipts and payments from borrowing and repaying loan principal.

Reporting cash flows from operating activities

6.7 An entity shall present cash flows from operating activities using either the indirect method in paragraphs 6.8 and 6.9 or the direct method in paragraph 6.10.

Indirect method

- 6.8 Under the indirect method, the net cash flow from operating activities is determined by adjusting profit or loss for the effects of non-cash transactions, any deferrals or accruals of past or future operating cash receipts or payments and items of income or expense associated with investing or financing cash flows. Under that method, the entity shall adjust profit or loss for the effects of:
 - (a) changes during the period in inventories and receivables and payables arising from operating activities;
 - (b) non-cash items such as depreciation, provisions, accrued income (expenses) not yet received (paid) in cash, unrealised foreign currency gains and losses, undistributed profits of associates and non-controlling interests; and
 - (c) all other items for which the cash flows relate to investing or financing activities.
- 6.9 Alternatively, the net cash flow from operating activities may be presented under the indirect method by showing the relevant revenues and expenses disclosed in the statement(s) of profit or loss and other comprehensive income and the changes during the period in inventories and receivables and payables arising from operating activities.

Direct method

- Under the direct method, net cash flow from operating activities is presented by disclosing information about major classes of gross cash receipts and gross cash payments. Such information may be obtained either:
 - (a) from the accounting records of the entity; or
 - (b) by adjusting sales, cost of sales and other items in the statement(s) of profit or loss and other comprehensive income for:
 - (i) changes during the period in inventories and receivables and payables arising from operating activities;
 - (ii) other non-cash items; and
 - (iii) other items for which the cash effects are investing or financing cash flows.

Reporting cash flows from other activities

6.11 An entity shall present separately major classes of gross cash receipts and gross cash payments arising from its activities other than operating activities. An entity that classifies cash flows from investing activities separately from cash flows from financing activities shall present cash flows from acquisitions and disposals

of notable relationship entities (or subsidiaries or other operating units, as applicable) as cash flows from investing activities.

Reporting cash flows on a net basis

6.12 Cash flows arising from operating and other activities may be reported on a net basis when they are cash receipts and cash payments for items in which the turnover is quick, the amounts are large and the maturities are short (eg the borrowing and repayment of short-term loans).

Interest and dividends

- 6.13 An entity shall present separately cash flows from interest paid and interest and dividends received. The entity shall classify these cash flows consistently from period to period.
- 6.14 An entity may classify interest paid and interest and dividends received as cash flows from operating activities because they are included in profit or loss. Alternatively, the entity may classify interest paid and interest and dividends received as cash flows from other activities because they are costs of obtaining financial resources or returns on investments.

Income tax

6.15 An entity shall present separately cash flows arising from income tax and shall classify them as cash flows from operating activities unless they can be specifically identified with an investing activity or a financing activity. When tax cash flows are allocated over more than one class of activity, the entity shall disclose the total amount of taxes paid.

Non-cash transactions

- 6.16 An entity shall exclude from the statement of cash flows investing and financing transactions that do not require the use of cash or cash equivalents. An entity shall disclose such transactions, separately or together, elsewhere in the financial statements in a way that provides all the relevant information about those other activities.
- 6.17 Many investing and financing activities do not have a direct impact on current cash flows even though they affect the capital and asset structure of an entity. The exclusion of non-cash transactions from the statement of cash flows is consistent with the objective of a statement of cash flows because these items do not involve cash flows in the current period. Examples of non-cash transactions are:
 - (a) the receipt of donated assets;
 - (b) the acquisition of assets by assuming directly related liabilities; and
 - (c) the acquisition of an entity by means of an equity issue.

Components of cash and cash equivalents

- 6.18 An entity shall disclose the components of cash and cash equivalents.
- An entity shall disclose, together with a commentary by management, the amount of significant cash and cash equivalent balances held by the entity that are unavailable for use by the entity. Cash and cash equivalents held by an entity may be unavailable for use by the entity because of, among other reasons, foreign exchange controls or legal restrictions.

Notes to Board members

Staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The most significant amendment to Section 7 is the deletion of paragraph 7.6, as staff consider the requirements for an entity to provide information about the basis of preparation of financial statements and specific accounting policies are already included in para. 7.3.

Section 7: Notes to the Financial Statements

Scope of this section

- 7.1 This section sets out the information to be presented in the notes to the financial statements and how to present it. Notes contain information in addition to that presented in:
 - (a) the statement of financial position;
 - (b) whichever of the following statements are presented: the statement of profit or loss and other comprehensive income, the statement of profit or loss and the statement of comprehensive income, the statement of income and retained earnings, and the statement of changes in equity; and
 - (c) the statement of cash flows.
- 7.2 Notes provide narrative descriptions or disaggregation of items presented in those statements and information about items that do not qualify for recording in those statements. In addition to the requirements of this section, nearly every other section of this Standard requires disclosures that are normally presented in the notes.

Structure of the notes

- 7.3 The notes shall:
 - (a) present information about the basis of preparation of the financial statements and the accounting policies used, in accordance with paragraphs 7.6–7.8; and
 - (b) disclose material information that is not presented elsewhere in the financial statements and either specifically required by this Standard or otherwise relevant to an understanding of any of the financial statements.
- 7.4 An entity shall, as far as practicable, present the notes in a systematic manner. An entity shall cross-reference each item in the financial statements to any related information in the notes.
- 7.5 Examples of systematic ordering or grouping of the notes include:
 - (a) giving prominence to the areas of its activities that the entity considers to be most relevant to an understanding of its financial performance and financial position, such as grouping information about particular operating activities;
 - (b) grouping information about items measured similarly, such as assets measured at fair value; and
 - (c) following the order of the line items in the statement of financial position and the statement(s) of profit or loss and other comprehensive income, such as:
 - (i) statement of compliance with this Standard (see paragraph 2.3);
 - (ii) material accounting policy information (see paragraph 7.6);
 - (iii) supporting information for items presented in the statement of financial position, the statement(s) of profit or loss and other comprehensive income, and the statements of changes in equity and of cash flows, in the order in which each statement and each line item is presented; and
 - (iv) other disclosures, including:
 - (1) contingent liabilities (see paragraph 19.15), contingent assets (see paragraph 19.17) and unrecorded firm commitments; and
 - (2) non-financial disclosures, if any.

Disclosure of accounting policy information

7.6 An entity shall disclose material accounting policy information. Accounting policy information is material if, when considered together with other information included in the entity's financial statements, it can reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements.

Information about judgements

7.7 An entity shall disclose, in the notes, the judgements, apart from those involving estimations (see paragraph 7.8), that management has made in the process of applying the entity's accounting policies and that have the most significant effect on the amounts recorded in the financial statements.

Information about key sources of estimation uncertainty

- 7.8 An entity shall disclose in the notes information about the key assumptions concerning the future, and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year. In respect of those assets and liabilities, the notes shall include details of:
 - (a) their nature; and
 - (b) their carrying amount as at the reporting date.

Audit fees

- 7.9 An entity shall disclose fees to each auditor or reviewer, including any network firm, separately for the following services performed during the reporting period:
 - (a) the audit or review of the financial statements; and
 - (b) all other services.

An entity shall disclose the nature of those other services.

Question 4 to Board members

An entity's investment in a notable relationship entity may be in the form of ordinary shares. On re-examination of the proposed requirements in ED 335, staff observe that unlike its requirements for financial instruments within the scope of Section 10, ED 335 is not clear as to whether it might be appropriate for an investment in a notable relationship entity that is measured at fair value to discontinue being measured at fair value when the investment comprises unlisted equity instruments and the conditions in paragraph 10.12 are met. Staff think this was implied by paragraphs 11.11-11.13 of ED 335 but recommend that, for clarity, Section 8 includes a specific requirement in this regard; mirroring the requirement set out in paragraph 10.12.

Do Board members agree with the staff recommendation to add a requirement to this Standard that an entity that measures investments in notable relationship entities at fair value shall discontinue measuring an investment at fair value when:

- (a) a quoted price in an active market is not observable for an identical equity instrument, or a similar equity instrument, close to the measurement date;
- (b) the cost of the equity instrument does not represent the best estimate of its fair value; and
- (c) the variability in the range of reasonable fair value measures is significant, and the probabilities of the various measures cannot be reasonably assessed;

and for such investments to be measured at cost (represented by the carrying amount of the investment on the date its fair value was last determined) less any accumulated impairment losses until the conditions in (a)—(c) are no longer relevant?

If not, what do Board members suggest?

Draft text reflecting the staff recommendation is set out in paragraph 8.32 of this draft Standard.

Question 5 to Board members

ED 335 specified that investments in notable relationship entities (and investments in subsidiaries, associates and joint ventures in separate financial statements) may be presented at their cost. This is consistent with the requirements in AASB 127 Separate Financial Statements for reporting in a second set of financial statements.

Staff note that under Section 13 investments in associates and joint ventures may be measured under a cost model. The difference between the two requirements is that the cost model specifies that the financial asset is subject to impairment. Similarly, financial instruments within the scope of Section 10 that are measured at cost are subject to impairment.

Staff think that the impairment requirements for financial assets measured at cost should similarly be extended to investments in notable relationship entities (and investments in subsidiaries, associates and joint ventures in separate financial statements). This acknowledges that the invested amount may not be recoverable.

Do Board members agree with the staff recommendation that investments in notable relationship entities (and investments in subsidiaries, associates and joint ventures in separate financial statements) that are measured at cost should be subject to impairment? Text reflecting the staff recommendation is set out in paragraph 8.30 of this draft Standard?

If not, what do Board members suggest?

Notes to Board members

- 1. Staff have made amendments to Section 8 to reflect the 19 August 2025 AASB meeting decision to revise the following aspects of Section 8 for clarity:
 - (a) the intended operation of the Section and its requirements, including clarifying the interaction between Section 8 and Section 13;
 - (b) that separate financial statements have the same meaning as in Tier 1 and Tier 2 reporting requirements. To this end, staff have added to the defined term from AASB 127 *Separate Financial Statements* the acknowledgement that certain 'separate financial statements' may not be a second set of financial statements this is reflected in paragraph 8.29(a) of this draft Standard;
 - (c) that if the fair value through other comprehensive income measurement and recognition election is made in accounting for the entity's first investment in a notable relationship entity, then that measurement approach applies to all of the entity's investments in notable relationship entities this is reflected in paragraph 8.31 of this draft Standard; and
 - (d) the relationship between power and the right to appoint key management personnel this is reflected in paragraphs 8.10(f) and 8.12(e) of this draft Standard.
- 2. In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the readability of the Section and clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 8 are:
 - (a) Restructured the section, including to relocate the paragraphs pertaining to significant influence (8.2-8.4 of ED 335) to Section 13 (paragraphs 13.5 13.7). In part, the re-ordering of the section is made as part of the amendments to the section to address 1(a) and 1(b) above.
 - (b) 8.6 Added a definition of consolidated financial statements.
 - (c) 8.35(c) Added examples to help entities understand how to comply with the requirement to disclose a description of the relationship between the entity and the notable relationship entity.

Section 8: Consolidated and Separate Financial Statements

Scope of this section

8.1 This section sets out the accounting by an entity that is a parent or an investor in a notable relationship entity.

Classification

- 8.2 An entity that is a parent shall present consolidated financial statements. An entity that is a parent may, in addition, present separate financial statements.
- 8.3 Notwithstanding paragraph 8.2, an entity, including a parent, may elect to collectively classify its subsidiaries, investments in associates and interests in joint arrangements that involve a separate vehicle as investments in notable relationship entities. An investor that classifies these investments as investments in notable relationship entities does not present consolidated financial statements but prepares separate financial statements as its only financial statements in accordance with paragraphs 8.30—8.35.

- A notable relationship between the entity and another entity (a 'notable relationship entity') exists when the investor has the power to, at a minimum, participate in the financial and operating policy decisions of that other entity. Paragraphs 13.5—13.7 provide guidance on when this might be evidenced. An entity that accounts for investments in notable relationship entities is not required to determine whether the nature of its relationship with the notable relationship entity is that of a parent, an investor in an associate, or a joint venturer or joint operator in a joint arrangement.
- 8.5 An entity does not need to hold an equity interest in another entity to be able to participate in the financial and operating policy decisions of that other entity. Similarly, an entity need not obtain a financial benefit from the other entity when assessing the nature of the entity's involvement with that other entity.

Consolidated financial statements

8.6 Consolidated financial statements are the financial statements of a group in which the assets, liabilities, equity, income, expenses and cash flows of the parent and its subsidiaries are presented as those of a single economic entity. A parent that presents consolidated financial statements in accordance with paragraph 8.2 shall present consolidated financial statements that include all subsidiaries of the parent. The consolidated financial statements shall not consolidate any entity that is not a subsidiary.

Assessing control of an investee

- 8.7 A subsidiary is an entity (an investee) controlled by another entity (an investor). An investor, regardless of the nature of its involvement with the investee, shall determine whether it is a parent by assessing whether it controls the investee.
- 8.8 An investor controls an investee when the investor has all the following:
 - (a) power over the investee;
 - (b) exposure, or rights, to variable returns from its involvement with the investee; and
 - (c) the ability to use its power over the investee to affect the amount of the investor's returns.
- 8.9 The investor shall reassess whether it controls an investee if circumstances indicate there are changes to one or more of the three elements of control listed in paragraph 8.8.
- 8.10 An investor has power over an investee when the investor has existing rights that give it the current ability to direct the relevant activities, which are the activities that significantly affect the investor's returns. Relevant activities include, but are not limited to:
 - (a) selling and purchasing goods or services;
 - (b) selecting, acquiring or disposing of assets;
 - (c) providing services in accordance with the investor's objectives;
 - (d) fundraising;
 - (e) developing budgets in relation to the activities in (a) (d); and
 - (f) appointing and remunerating an investee's key management personnel and terminating their employment.
- An investor with the current ability to direct the relevant activities has power even if its rights to direct them have yet to be exercised. Evidence that the investor has been directing relevant activities can help determine whether the investor has power, but is not, in itself, conclusive in determining whether the investor has power over an investee.
- 8.12 An investor can have power even if it holds less than a majority of the voting rights of an investee, for example, through:
 - (a) a contractual arrangement between the investor and other vote holders;
 - (b) rights arising from other contractual arrangements;
 - (c) the investor's voting rights;
 - (d) potential voting rights;
 - (e) rights to appoint, reassign or remove members of an investee's key management personnel who have the ability to direct the relevant activities; or
 - (f) a combination of (a)–(e).

- 8.13 When determining whether it has power, an investor considers its potential voting rights as well as potential voting rights held by other parties. Potential voting rights are rights to obtain voting rights of an investee, such as those arising from convertible instruments or options, including forward contracts. Those potential voting rights are considered only if the holder of the right has the practical ability to exercise that right. Usually, for the holder of the right to have the practical ability to exercise that right, the right needs to be currently exercisable.
- 8.14 If an investor also has voting or other decision-making rights relating to the investee's relevant activities, the investor assesses whether those rights, in combination with potential voting rights, give the investor power.
- 8.15 An investor is exposed, or has rights, to variable returns from its involvement with the investee when the investor's returns from its involvement have the potential to vary as a result of the investee's performance. The investor's returns can be only positive, only negative or both positive and negative.
- An investor's returns from its involvement with an investee are broad in nature, encompassing financial, non-financial, direct and indirect benefits, such as when the furtherance of the investee's financial and non-financial objectives contributes to the furtherance of the investor's financial and non-financial objectives. For example, the provision of goods or services by the investee to its beneficiaries might further the achievement of the investor's social policy objectives. These returns to the investor would reflect factors such as the efficiency and effectiveness of delivery of the goods and services and changes in the outcomes for beneficiaries.
- 8.17 When an investor with decision-making rights (a decision-maker) assesses whether it controls an investee, it shall determine whether it is a principal or an agent. An investor shall also determine whether another entity with decision-making rights is acting as an agent for the investor. An agent is a party primarily engaged to act on behalf and for the benefit of another party or parties (the principal(s)) and therefore does not control the investee when it exercises its decision-making authority. Thus, sometimes a principal's power may be held and exercisable by an agent, but on behalf of the principal. A decision-maker is not an agent simply because other parties can benefit from the decisions it makes.

Consolidation procedures

- 8.18 In preparing consolidated financial statements, an entity shall:
 - (a) combine the financial statements of the parent and its subsidiaries line by line, by adding together like items of assets, liabilities, equity, income, expenses and cash flows;
 - (b) eliminate the carrying amount of the parent's investment in each subsidiary and the parent's portion of equity of each subsidiary;
 - (c) eliminate in full intragroup assets, liabilities, equity, income, expenses and cash flows (including dividends). Profits and losses resulting from intragroup transactions that are recorded in assets, such as inventory and property, plant and equipment, are eliminated in full. Intragroup losses may indicate an impairment that requires recording in the consolidated financial statements (see Section 23);
 - (d) measure and present non-controlling interests in the profit or loss of consolidated subsidiaries for the reporting period separately from the interest of the owners of the parent; and
 - (e) measure and present non-controlling interests in the net assets of consolidated subsidiaries separately from the parent owners' equity in them. Non-controlling interests in the net assets consist of:
 - (i) the amount of the non-controlling interests at the date of the original combination calculated in accordance with Section 17; and
 - (ii) the non-controlling interests' share of changes in equity since the date of the combination.
- 8.19 The proportions of profit or loss and changes in equity allocated to the owners of the parent and to the non-controlling interests are determined on the basis of existing ownership interests and do not reflect the possible exercise or conversion of potential voting rights.

Uniform reporting date

8.20 The financial statements of the parent and its subsidiaries used in the preparation of the consolidated financial statements shall be prepared as of the same reporting date unless doing so is impracticable. If it is impracticable to prepare the financial statements of a subsidiary as of the same reporting date as the parent, the parent shall consolidate the financial information of the subsidiary using the most recent financial statements of the subsidiary, adjusted for the effects of significant transactions or events that occur between the date of those financial statements and the date of the consolidated financial statements. In any case, the difference between

the date of the subsidiary's financial statements and that of the consolidated financial statements shall not exceed three months, and both the length of the reporting periods and any difference between the dates of the financial statements shall be the same from period to period.

Uniform accounting policies

8.21 Consolidated financial statements shall be prepared using uniform accounting policies for like transactions, other events and conditions in similar circumstances. If a subsidiary uses accounting policies other than those adopted in the consolidated financial statements for like transactions and other events in similar circumstances, appropriate adjustments are made to its financial statements in preparing the consolidated financial statements to ensure conformity with the group's accounting policies.

Acquisition and disposal of subsidiaries

- 8.22 The income and expenses of a subsidiary are included in the consolidated financial statements from the acquisition date until the date on which the parent loses control of the subsidiary.
- 8.23 If a parent loses control of a subsidiary, the parent:
 - (a) ceases recording:
 - (i) the assets and liabilities at their carrying amounts at the date control is lost in the former subsidiary; and
 - (ii) the carrying amount of any non-controlling interests in the former subsidiary at the date control is lost (including any components of other comprehensive income attributable to them);
 - (b) records:
 - (i) the fair value of the consideration received, if any, from the transaction, other event or circumstances that resulted in the loss of control; and
 - (ii) any investment retained in the former subsidiary at its fair value as at the date control is lost; and
 - (c) records the gain or loss associated with the loss of control attributable to the former controlling interest.
- 8.24 If a parent loses control of a subsidiary but continues to hold an interest in the former subsidiary, that interest shall be accounted for in accordance with the appropriate section of this Standard. If the retained interest is a financial asset, Section 10; and if it is an interest in an associate or a joint venture, Section 13 applies. The fair value at the date control is lost shall be regarded as the fair value on initial recording of a financial asset or the cost on initial recording of an investment in an associate or joint venture, if applicable.

Non-controlling interests in subsidiaries

- 8.25 An entity shall present non-controlling interests in the consolidated statement of financial position within equity, separately from the equity of the owners of the parent, as required by paragraph 3.2(n).
- 8.26 An entity shall treat changes in a parent's controlling interest in a subsidiary that do not result in a loss of control as transactions with owners acting in their capacity as owners. Accordingly, the carrying amount of the non-controlling interests shall be adjusted to reflect the change in the parent's interest in the subsidiary's net assets. Any difference between the amount by which the non-controlling interests are so adjusted and the fair value of the consideration paid or received, if any, shall be recorded directly in equity and attributed to owners of the parent. An entity shall not record any gain or loss on these changes. Also, an entity shall not record any change in the carrying amounts of assets or liabilities as a result of such transactions.
- 8.27 Profit or loss and each component of other comprehensive income shall be attributed to the owners of the parent and to the non-controlling interests. Total comprehensive income shall be attributed to the owners of the parent and to the non-controlling interests even if this results in the non-controlling interests having a deficit balance.

Disclosures in consolidated financial statements

- 8.28 In addition to the disclosures specified by Section 28, an entity shall disclose in its consolidated financial statements:
 - (a) that the financial statements are consolidated financial statements;

- (b) the basis for concluding that control exists if the parent does not own, directly or indirectly through subsidiaries, a majority of the voting rights of the other entity;
- (c) any difference between the reporting dates of the financial statements of the parent and its subsidiaries used in the preparation of the consolidated financial statements; and
- (d) the nature and extent of any significant restrictions (for example, resulting from borrowing arrangements or regulatory requirements) on the ability of subsidiaries to transfer funds to the parent in the form of cash dividends or to repay loans.

Separate financial statements

- 8.29 Separate financial statements are:
 - (a) the financial statements presented by an investor that accounts for investments in notable relationship entities;
 - (b) a second set of financial statements that a parent elects to present in addition to consolidated financial statements; or
 - (c) a second set of financial statements that an investor that is not a parent but has one or more investments in associates or joint ventures elects to present.

Measurement

- 8.30 Investments in notable relationship entities shall be measured at either:
 - (a) cost, less any accumulated impairment losses determined in accordance with Section 10;
 - (b) fair value; or
 - (c) the equity method-based amount, determined by following the procedures in paragraph 13.22.

The entity shall apply the same accounting policy to all investments in notable relationship entities.

- 8.31 Changes in the fair value of investments in notable relationship entities measured at fair value shall be presented in profit or loss unless the entity makes an irrevocable election, on the initial recording of the first asset in this class of assets, to present such changes in other comprehensive income. When an entity presents changes in the fair value of investments in notable relationship entities in other comprehensive income, those changes shall not subsequently be transferred to profit or loss.
- 8.32 Where an entity elects to measure investments in notable relationship entities at fair value, the entity shall discontinue measuring an investment that is represented by unlisted equity instruments at fair value when:
 - (a) a quoted price in an active market is not observable for an identical equity instrument, or a similar equity instrument, close to the measurement date;
 - (b) the cost of the equity instrument does not represent the best estimate of its fair value (refer paragraphs 10.15—10.17); and
 - (c) the variability in the range of reasonable fair value measures is significant, and the probabilities of the various measures cannot be reasonably assessed.

Such investments shall be measured at cost less any accumulated impairment losses. In these instances, the carrying amount of the investment on the date its fair value was last determinable shall be regarded as its cost. An entity shall resume measuring the investment in an unlisted equity instrument at fair value when the conditions in (a)—(c) are no longer relevant.

8.33 When an entity that classifies its investments as subsidiaries, associates or joint ventures prepares separate financial statements, the entity shall choose one of the accounting policies specified in paragraphs 8.30—8.32 and shall apply that policy to entire class of investments.

Disclosures in separate financial statements

- 8.34 When an entity prepares separate financial statements, those separate financial statements shall disclose:
 - (a) that they are separate financial statements; and
 - (b) a description of the method(s) used to account for its investments in notable relationship entities, or for its investments in subsidiaries, joint ventures and associates.
- 8.35 In addition to the disclosures specified by Section 28, in respect of each notable relationship entity, an entity shall disclose:

- (a) its name;
- (b) a clear and concise description of its primary purpose and an indication of the nature of its operations;
- (c) a description of its relationship with the reporting entity (eg that the entities operate a partnership, that the reporting entity is able to appoint the key management personnel of the notable relationship entity, or that the entity controls the notable relationship entity); and
- (d) whether the notable relationship entity prepares audited or reviewed financial statements.

Notes to Board members

Staff have made amendments to Section 9 to reflect the following 3 July 2025 AASB meeting decisions:

- Paragraphs 9.22 and 9.23 were amended as marked up below to effect the Board's decision to require retrospective application of the correction of prior period errors; and
- Paragraph 9.24 was amended and paragraph 9.27 of ED 335 was omitted to align the equivalent disclosure requirements to AASB 1060 for the revision to require retrospective application of the correction of prior period errors.

In addition, staff have suggested amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 9 are:

• Modified retrospective approach – Amendments made to improve the clarity of the requirements. This included (1) removing the duplication to paragraph 9.12(b) as it is incorporated into the leading paragraph of 9.10 (recording the adjustment to opening equity), (2) removing the requirement in paragraph 9.10(b) to apply the revised accounting policy to the current period, as this is not an application of the modified retrospective approach, and (3) amending paragraph 9.13 of ED 335 (now merged into paragraph 9.112), to reflect more clearly the original intent that applying a change in accounting policies to revalue assets for property, plant and equipment and intangible asset would not be subject to a change in accounting policies in Section 9 but accounted for prospectively, which aligns with paragraph 17 of AASB 108 Accounting Policies, Changes in Accounting Estimates and Errors

Section 9: Accounting Policies, Estimates and Errors

Scope of this section

9.1 This section provides requirements and guidance for selecting and applying the accounting policies used in preparing financial statements. It also covers changes in accounting estimates and corrections of errors in prior period financial statements.

Selection and application of accounting policies

- 9.2 Accounting policies are the specific principles and practices applied by an entity in preparing and presenting financial statements.
- 9.3 If this Standard specifically addresses a transaction, other event or condition, an entity shall apply this Standard. However, the entity need not follow a requirement in this Standard if the effect of doing so would be immaterial.

Accounting policies

- 9. If this Standard does not specifically address a transaction, other event or condition and paragraphs 1.3(a)–(g) do not apply, management shall use its judgement in developing and applying an accounting policy that results in information that is:
 - (a) relevant to the information needs of users of financial statements; and
 - (b) reliable, in that the financial statements:
 - (i) represent faithfully the financial position, financial performance and cash flows of the entity;
 - (ii) reflect the economic substance of transactions, other events and conditions, and not merely their legal form;

- (iii) are neutral, ie free from bias;
- (iv) are prudent; and
- (v) are complete in all material respects.
- 9.5 In making the judgement described in paragraph 9.5, management shall refer to, and consider the applicability of, the following sources in descending order:
 - (a) the requirements and guidance in this Standard dealing with similar and related issues; and
 - (b) the definitions, recognition criteria and measurement concepts for assets, liabilities, income and expenses in the *Conceptual Framework*.

In making this judgement, management may also consider the requirements and guidance in other Australian Accounting Standards dealing with similar and related issues, to the extent that those requirements and guidance do not conflict with this Standard.

Consistency of accounting policies

9.6 An entity shall select and apply its accounting policies consistently for similar transactions, other events and conditions, unless this Standard specifically requires or permits categorisation of items for which different policies may be appropriate. If this Standard requires or permits such categorisation, an appropriate accounting policy shall be selected and applied consistently to each category.

Changes in accounting policies

- 9.7 An entity shall change an accounting policy only if the change:
 - (a) is required by this Standard; or
 - (b) results in the financial statements providing reliable and more relevant information about the effects of transactions, other events or conditions on the entity's financial position, financial performance or cash flows.
- 9.8 Except as noted in paragraph 4.4, where this Standard allows a choice of accounting treatment (including the measurement basis) for a specified transaction, other event or condition and an entity changes its choice, that is a change in an accounting policy. A change to applying the cost model when a reliable measure of fair value is no longer available, or reverting to applying the revaluation model when a reliable measure of fair value once again becomes available, for an asset that this Standard would otherwise require or permit to be measured at fair value is not a change in an accounting policy.

Applying changes in accounting policies

- 9.9 An entity shall account for:
 - (a) a change in an accounting policy resulting from a change in the requirements of this Standard in accordance with the transitional provisions, if any, applying to that change; and
 - (b) all other changes in accounting policies retrospectively, using the modified retrospective approach specified in paragraphs 9.10–9.11. This applies to voluntary changes in accounting policies and changes in accounting policies resulting from a change in the requirements of this Standard without accompanying specified transitional provisions.

Modified retrospective approach

- 9.10 When a change in an accounting policy is applied retrospectively in accordance with paragraph 9.9, the entity shall record the cumulative effect of the new accounting policy at the beginning of the current reporting period, as if the new accounting policy had always been applied and without restating information presented in prior periods (a 'modified retrospective approach'). The entity shall, as at the beginning of the current reporting period:
 - (a) adjust the opening balance of each affected asset and liability for the cumulative effect of applying the new accounting policy; and
 - (b) make a corresponding adjustment to the opening balance of each affected component of equity (eg retained earnings).

The effects of the change in accounting policy pertaining to prior periods presented are not included in profit or loss of the current reporting period.

- 9.11 Notwithstanding paragraph 9.10, when it is impracticable to determine the cumulative effect, as at the beginning of the current period, of applying a new accounting policy retrospectively to all prior periods, the entity shall:
 - (a) adjust the opening balances of the current reporting period for affected assets, liabilities and items of equity to reflect application of the new accounting policy prospectively from the earliest date practicable, which may be the beginning of the current period; and
 - (b) disregard the portion of the cumulative adjustment to assets, liabilities and items of equity arising before the date in (a).

The initial application of a policy to revalue assets in accordance with Section 15 and Section 16 is a change in an accounting policy to be dealt with as a revaluation in accordance with Section 15 and Section 16. Consequently, a change from the cost model to the revaluation model for a class of property, plant and equipment or intangible assets shall be accounted for prospectively, instead of in accordance with paragraphs 9.10—9.11.

Disclosure of a change in an accounting policy

- 9.12 When an amendment to this Standard or a voluntary change in an accounting policy affects the opening balances of assets, liabilities or items of equity for the current period or other amounts recorded for the current period, an entity shall disclose the following:
 - (a) the nature of the change in accounting policy;
 - (b) the amounts of the adjustments to the opening balances for the current period, to the extent practicable; and
 - (c) for all other effects on the assets, liabilities, income and expenses for the current period, the amount of the adjustment for each financial statement line item affected.

When a modified retrospective approach applies to a change in an accounting policy, the entity's note disclosing the material accounting policies used (see paragraph 7.3(a)) shall disclose that fact and that the comparative information presented for prior periods was not adjusted.

- 9.13 When a voluntary change in an accounting policy affects the opening balances of assets, liabilities or items of equity for the current period or other amounts recorded for the current period, an entity shall disclose the reasons why applying the new accounting policy provides reliable and more relevant information.
- 9.14 The disclosures made in accordance with paragraph 9.12 or 9.13 need not be repeated in financial statements of subsequent periods.

Accounting estimates

9.15 Some items in financial statements are subject to measurement uncertainty – that is, under the measurement basis applied, their amounts cannot be observed directly and must instead be estimated using judgements or assumptions about such matters as the fair value of infrequently sold assets, amounts recoverable from overdue receivables or old inventory and the remaining useful lives of items of property, plant and equipment.

Changes in accounting estimates

- 9.16 An entity may need to change an accounting estimate if changes occur in the circumstances on which the accounting estimate was based or as a result of new information, new developments or more experience. The revision of an accounting estimate does not relate to prior periods and is not a correction of an error.
- 9.17 An entity shall record the effect of a change in an accounting estimate, other than a change to which paragraph 9.20 applies, prospectively from the date of the change in estimate by including it in profit or loss in:
 - (a) the period of the change, if the change affects that period only; or
 - (b) the period of the change and future periods, if the change affects both.
- 9.18 To the extent that a change in an accounting estimate gives rise to changes in assets and liabilities, or relates to an item of equity, the entity shall record it by adjusting the carrying amount of the related asset, liability or equity item in the period of the change.

Disclosure of changes in accounting estimates

9.19 An entity shall disclose the nature of any change in an accounting estimate and the effect of the change on assets, liabilities, income and expenses for the current period.

Corrections of prior period errors

- 9.20 Prior period errors are omissions from, and misstatements in, an entity's financial statements for one or more prior periods arising from a failure to use, or misuse of, reliable information that:
 - (a) was available when financial statements for those periods were authorised for issue; and
 - (b) could reasonably be expected to have been obtained and taken into account in the preparation and presentation of those financial statements.
- 9.21 Such errors include the effects of mathematical mistakes, mistakes in applying accounting policies, oversights or misinterpretations of facts, and fraud.
- 9.22 Potential errors identified during the reporting period shall be corrected before the financial statements are authorised for issue. To the extent practicable, an entity shall correct a material prior period error retrospectively in the first set of financial statements authorised for issue after its discovery by:
 - (a) restating the comparative amounts for the prior period(s) presented in which the error occurred; or
 - (b) if the error occurred before the earliest prior period presented, restating the opening balances of assets, liabilities and equity for the earliest prior period presented.
- 9.23 When it is impracticable to determine the effects of an error on comparative information for one or more prior periods presented, the entity shall restate the opening balances of assets, liabilities and equity for the earliest period for which retrospective restatement is practicable (which might be the beginning of the current period).

Disclosure of prior period errors

- 9.24 An entity shall disclose the following about each prior period error:
 - (a) a description of the error;
 - (b) for each prior period presented, to the extent practicable, the amount of the correction for each financial statement line item affected;
 - (c) to the extent practicable, the amount of the correction at the beginning of the earliest prior period presented; and
 - (d) an explanation if it is not practicable to determine the amounts to be disclosed in (b) or (c).

The disclosures made in accordance with paragraph 9.24 need not be repeated in financial statements of subsequent periods.

Notes to Board members

- 1. Staff have made amendments to Section 10 to reflect the following 7 October 2025 AASB meeting decisions:
 - (a) to specify that AASB 9 (or other relevant Standards) applies only to the more complex financial instruments and financial instruments not commonly held by Tier 3 entities listed in paragraph 10.3 of ED 335, such that the entity will be required to develop an appropriate accounting policy for other such financial instruments:
 - (b) to explicitly specify that an entity need not separately recognise and measure embedded derivatives (as stated in paragraph 10.5(a) of this draft Standard);
 - (c) to no longer require the recognition of a commitment to provide a loan at a below-market rate (as stated in paragraph 10.5(b) of this draft Standard);
 - (d) to amend paragraph 10.7(a) of ED 335 to clarify that all financial assets <u>held</u> to generate both income and a capital return for the entity are to be measured at fair value;
 - (e) to avoid the apparent inconsistency with fair value as described in Tier 1 and Tier 2 reporting requirements. To this end, staff have made amendments to avoid depicting that a fair value estimate of equity instruments may not be reliably measurable to better align with AASB 13, which applies to the measurement of certain 'more complex financial instruments that are not commonly held by Tier 3 entities'. The purpose of the edit is so that the same fair value measurement principles apply to financial instruments whether they are measured in accordance with the Tier 3 Standard or AASB 9. The revised requirement set out in draft paragraph 10.12 simply states that fair value measurement is paused when certain conditions are present. The requirements were moved from their original location to keep them together with the related measurement requirements;

- (f) to amend paragraph 10.16 of ED 335 so that the calculation of interest income and expense is not limited by the carrying amount of the financial asset or financial liability at the beginning of a period;
- (g) to amend paragraph 10.21 of ED 335 to require an impairment loss to be measured as the difference between the asset's carrying amount and the estimated future cash flows receivable; and
- (h) to amend paragraph 10.27 of ED 335 to clarify that separate disclosure is required of those fair value measurements that are based are a quoted price in an active market for an identical asset or liability.
- 2. In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 10 are:
 - (a) paragraph 10.2 and elsewhere Per the Board's decisions in making its ED 335 proposals, financial instruments that are 'commonly held by NFP private sector Tier 3 entities' include **both** some 'more complex' financial instruments and all basic financial instruments. It follows then that it is only the more complex financial instruments that are not commonly held by NFP private sector Tier 3 entities that are to apply Tier 2 accounting requirements. To make this clear, staff:
 - i. have added 'other' to the "basic financial instruments or financial instruments commonly held" descriptor so that it states "basic financial instruments or <u>other</u> financial instruments ...";
 - ii. no longer use the "more complex financial instruments and financial instruments not commonly held" descriptor but have simply listed the financial instruments to which AASB 9 applies
 - iii. will add a comment in the Basis for Conclusions to make this point.
 - (b) paragraph 10.2 An addition to clarify the scoping of Section 10 is necessary so that it is clear that the disclosure and other requirements in Section 10 do not apply to financial instruments like investments in associates or employee benefits payable.
 - (c) paragraph 10.10 The ED 335 definition of a concessional loan does not include loans that have a market interest rate but concessionary terms such as a longer repayment period or waiver of collateral. Staff suggest amending the definition to indicate that such terms and conditions could also be reflective of a concessional loan, by aligning the concessional loan definition to the concessionary lease description in AASB 16 *Leases*: 'leases that have significantly below-market terms and conditions principally to enable the entity to further its objectives'. Also, staff reflected that a NFP entity might offer microfinance to small for-profit businesses on concessionary terms to enable the recipient to build the business (e.g. to empower people in poverty to lift themselves out of poverty). Consequently, staff think that the focus of the definition should be amended to reflect that the concessional terms are granted to fulfil the reporting entity's NFP objectives, rather than having regard to the borrower's objectives.
 - (d) the section formerly entitled 'Cost as estimated fair value of investments in equity instruments'— Amendments proposed to clarify when cost may be a relevant measure of fair value, and to avoid conflating cost as representative of fair value and cost as an alternative to fair value.
 - (e) paragraph 10.20 On further consideration of 10.17 and 10.20 of ED 335, it appeared redundant to require the impairment assessment of debtors to be separately considered from the impairment assessment of other financial assets, when taken together with the requirement for the impairment assessment to be actioned by asset or for a group that had similar credit risk characteristics.
 - (f) paragraph 10.27 deleted the requirement to disclose the nature of specified categories of financial assets and financial liabilities. Staff made this amendment on consideration that this requirement appears 'more than' what is required of entities complying with Tier 2 reporting requirements and to remove the potential double-up with the requirement for entities to disclose financial instrument line items.
 - (g) Paragraph 10.30(b) deleted the requirement to disclose the nature and amount of the liabilities and contingent liabilities against which financial assets have been pledged, as this appears additional to what is required of entities complying with Tier 2 reporting requirements. Staff note these disclosures are in effect a replication of paragraph 10.28 (information about significant borrowings) and paragraph 19.14 (disclosure about the nature and amount of contingent liabilities).
 - (h) Paragraph 10.32(b) ED 335 required the disclosure of interest income and interest expense for only financial instruments measured at FVTPL. Staff think this requirement is unnecessarily complex when considering the Board's decisions for financial instruments and the type and extent of financial instruments likely to be held by Tier 3 entities. Consequently, staff suggest amending the requirement to simply require the disclosure of total interest income and interest expense.

Section 10: Financial Instruments

Scope of this section

A financial instrument is a contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

- 10.2 Section 10 applies to basic financial instruments and other financial instruments commonly held by Tier 3 entities, and that are not addressed by another section of this Standard. These financial instruments include:
 - (a) cash and cash equivalents;
 - (b) trade and other receivables ('debtors');
 - (c) security bonds (eg residential bonds);
 - (d) term deposits;
 - (e) government and listed corporate bonds;
 - (f) units held in managed investment schemes, unit trusts and similar investment vehicles;
 - (g) ordinary shares and non-convertible preference shares held in listed or unlisted entities, including preference shares redeemable for a known amount of cash or the cash equivalent of their share of the investee's net assets;
 - (h) trade and other payables ('creditors'); and
 - (i) loans.
- 10.3 Loans may be amounts borrowed or amounts lent. The loan may be provided on interest-bearing or interest-free terms, or on terms that create leverage.
- An entity applying this Standard shall apply the recording, measurement, presentation and transition requirements of AASB 9 *Financial Instruments* and other applicable Australian Accounting Standards, and the relevant disclosure requirements of AASB 1060, to the following financial instruments:
 - (a) unlisted purchased debt instruments (eg unlisted corporate bonds and unlisted convertible notes);
 - (b) acquired equity instruments other than ordinary shares and non-convertible preference shares;
 - (c) financial guarantee contracts; and
 - (d) derivative financial instruments (eg interest rate swaps and forward exchange contracts).
- 10.5 An entity applying this Standard shall not:
 - (a) separately record any embedded derivatives;
 - (b) record a commitment to provide a loan at a below-market interest rate; or
 - (c) notwithstanding paragraph 10.4, apply the hedge accounting requirements in AASB 9 to its financial assets and financial liabilities.

Initial recording of financial assets and liabilities

- 10.6 An entity shall record a financial asset or a financial liability when and only when:
 - (a) cash is received; or
 - (b) the entity otherwise becomes a party to the contractual provisions of the instrument.
- 10.7 An entity is a party to the contractual provisions of a financial instrument when, for example:
 - (a) the entity has the legal right to receive cash from a debtor following the transfer of goods or services;
 - (b) the entity lends money to a borrower under a loan arrangement;
 - (c) the entity acquires equity instruments;
 - (d) the entity receives funds under a loan arrangement or bank overdraft facility; or
 - (e) the entity is legally obliged to pay for goods or services received from a supplier.

Initial measurement

- 10.8 Subject to paragraph 10.9 and 10.10, when a financial asset or financial liability is initially recorded, an entity shall measure it at its fair value (excluding transaction costs). Transaction costs and upfront fees incurred are expensed immediately.
- 10.9 Trade and other receivables shall be initially measured at the transaction price. Guidance on the recording of any related revenue is set out in Section 20.
- 10.10 A concessional loan shall be initially measured at its transaction price. A concessional loan is a loan that has significantly below-market terms and conditions principally to enable the reporting entity to further its objectives.

Subsequent measurement

- 10.11 After initial recording, an entity shall measure financial assets and financial liabilities as follows:
 - (a) financial assets held to generate both income and a capital return for the entity (including all investments in equity instruments) shall be measured at fair value, except when paragraph 10.12 applies;
 - (b) all other financial assets shall be measured at cost less any accumulated impairment losses; and
 - (c) all financial liabilities shall be measured at cost.
- 10.12 Notwithstanding paragraph 10.11, an entity shall discontinue measuring an investment in an unlisted equity instrument at fair value when:
 - (a) a quoted price in an active market is not observable for an identical equity instrument, or a similar equity instrument, close to the measurement date;
 - (b) the cost of the equity instrument does not represent the best estimate of its fair value; and
 - (c) the variability in the range of reasonable fair value measures is significant, and the probabilities of the various measures cannot be reasonably assessed.

Such instruments shall be measured at cost less any accumulated impairment losses. In these instances, the carrying amount of the instrument on the date its fair value was last determinable shall be regarded as its cost. An entity shall resume measuring an investment in an unlisted equity instrument at fair value when the conditions in (a)—(c) are no longer relevant.

- 10.13 Changes in the fair value of financial assets held to generate both income and a capital return for the entity shall be presented in profit or loss unless the entity makes an irrevocable election, on the initial recording of the first asset in a class of financial assets, to present changes in the fair value of that class of financial assets in other comprehensive income. When an entity presents changes in the fair value of financial assets in other comprehensive income, those changes shall not subsequently be transferred to profit or loss.
- The cost of a financial asset or financial liability as at each reporting date (before any reduction, directly or through the use of an allowance account, for impairment) is the net of the following amounts:
 - (a) the amount at which the financial asset or financial liability is measured at initial recording;
 - (b) minus any repayments of the principal; and
 - (c) plus or minus any prepayments or overdue payments of interest.

Cost as estimated fair value of investments in equity instruments

- An entity shall use valuation techniques that maximise the use of relevant observable inputs when measuring the fair value of investments in equity instruments that do not have a quoted price. In limited circumstances, the cost of an equity instrument might be an appropriate estimate of the instrument's fair value. This may be the case if insufficient more recent information is available to measure fair value, or if there is a wide range of possible fair value measurements and cost represents the best estimate of fair value within that range.
- 10.16 Indicators that the cost of an equity instrument that does not have a quoted price might not be representative of its fair value include:
 - (a) the transaction to acquire financial asset was between related parties. (However, the price in a related party transaction might be used as an input into a fair value measurement if the transaction was conducted at market terms);
 - (b) the transaction occurred under duress or the seller was forced to accept the sales price in the transaction because the seller was experiencing financial difficulty); and
 - (c) there has been one or more significant developments or unexpected changes since the equity instruments were acquired, in:
 - (i) the investee's operating performance, strategy or economic environment (eg market demand for its outputs); or
 - (ii) valuations implied by the overall market (eg due to changes in market interest rates).
- 10.17 The fair value of a quoted equity instrument can always be measured reliably. Cost is never the best estimate of fair value for investments in quoted equity instruments.

Dividend income

- 10.18 Dividends are recorded as amounts receivable and income in profit or loss only when:
 - (a) a dividend payable to the entity for a determinable amount has been declared; and
 - (b) publicly available information does not indicate that the dividend might not be collectible.

Interest income and interest expense

10.19 Interest income and interest expense is measured by reference to the financial instrument's contractual interest rate.

Impairment of financial assets measured at cost

Recording

- 10.20 At the end of each reporting period, an entity shall assess whether there is objective evidence of impairment of any financial assets measured at cost. If there is objective evidence of impairment, the entity shall record an impairment loss in profit or loss immediately. An entity shall assess financial assets for impairment either individually or grouped on the basis of similar credit risk characteristics.
- 10.21 Objective evidence that a financial asset, or group of assets, is impaired includes observable data that come to the attention of the entity about the following loss events:
 - (a) significant financial difficulty of the issuer or obligor;
 - (b) a breach of contract, such as a default or delinquency in interest or principal payments;
 - (c) the entity, for economic or legal reasons relating to an debtor's financial difficulty, granting to the debtor a concession that the entity would not otherwise consider;
 - (d) it has become probable that the debtor will enter bankruptcy or other financial reorganisation; or
 - (e) there has been a measurable decrease in the estimated future cash flows from a group of financial assets since the initial recording of those assets, even though the decrease cannot yet be identified with individual financial assets in the group, such as adverse national or local economic conditions or adverse changes in industry conditions.
- 10.22 Other factors may also be evidence of impairment, including significant changes with an adverse effect that have taken place in the technological, market, economic or legal environment in which the debtor or issuer operates.

Measurement

10.23 An entity shall measure an impairment loss for a financial asset measured at cost as the difference between the asset's carrying amount and the estimated future cash flows receivable.

Ceasing to record a financial asset

- An entity shall cease to record a financial asset only when either:
 - (a) the contractual rights to the cash flows from the financial asset expire or are settled; or
 - (b) the entity otherwise loses control of the financial asset.

Ceasing to record a financial liability

- 10.25 An entity shall cease to record a financial liability only when it is extinguished. A financial liability is extinguished when the obligation specified in the contract is discharged, is cancelled or expires.
- 10.26 A modification of the terms of a financial liability or an exchange of a debt instrument for a different debt instrument shall be treated as an extinguishment of the original financial liability.

Disclosures

Statement of financial position – categories of financial assets and financial liabilities

- 10.27 An entity shall disclose the carrying amount of each of the following categories of financial assets and financial liabilities as at the reporting date, in total, either in the statement of financial position or in the notes:
 - (a) financial assets measured at fair value through profit or loss;
 - (b) financial assets measured at fair value through other comprehensive income;
 - (c) financial assets measured at cost less any accumulated impairment losses; and
 - (d) financial liabilities.
- An entity shall disclose additional information that enables users of its financial statements to evaluate the significance of each individually significant loan payable or loan receivable for its financial position and performance. Such information would normally include the terms and conditions of the loan arrangement (such as interest rate, maturity and any restrictions that the arrangement imposes on the entity).
- 10.29 An entity shall disclose the total carrying amount of financial assets measured at a fair value that is based on a quoted price in an active market for an identical asset.

Collateral

- 10.30 When an entity has pledged financial assets as collateral for liabilities or contingent liabilities, it shall disclose the following:
 - (a) the carrying amount of the financial assets pledged as collateral; and
 - (b) the terms and conditions relating to its pledge.

Defaults and breaches on loans payable

- 10.31 For loans payable recorded as at the reporting date for which a breach of terms or a default of principal, interest, sinking fund or redemption terms has not been remedied by the reporting date, an entity shall disclose the following:
 - (a) details of that breach or default;
 - (b) the carrying amount of the related loans payable as at the reporting date; and
 - (c) whether the breach or default was remedied, or the terms of the loans payable were renegotiated, before the financial statements were authorised for issue.

Items of income and expense, and gains or losses

- 10.32 An entity shall disclose the following items of income, expense, gains or losses:
 - (a) income, expense, gains or losses, including changes in fair value, recorded on:
 - (i) financial assets measured at fair value through profit or loss;
 - (ii) financial assets measured at fair value through other comprehensive income;
 - (iii) financial assets measured at cost less any accumulated impairment losses; and
 - (iv) financial liabilities;
 - (b) total interest income and total interest expense; and
 - (c) the amount of any impairment loss for each class of financial asset.

Notes to Board members

Staff have made an amendment to Section 11 to reflect the following 3 July 2025 AASB meeting decision:

Paragraph 11.7 was amended by removing 'in general' from the beginning of the second sentence, so that after
applying the practical expedient in that sentence, there is no uncertainty about whether market participants'
assumptions still need to be estimated.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 11 is paragraph 11.13 of ED 335 — deleted because staff considered it more helpful for Tier 3 preparers that the guidance for when a reliable measure of fair value is no longer available for an asset should be provided within the individual topic sections instead (i.e. Sections 8, 10, 13, 14, 15 and 16).

Section 11: Fair Value Measurement

Scope of this section

This section applies when another section requires or permits fair value measurements or disclosures about fair value measurements.

Measurement

- The objective of a fair value measurement is to estimate the price at which an orderly transaction (not a forced transaction) to sell an asset or to transfer a liability would take place between market participants at the measurement date under current market conditions (ie, an exit price at the measurement date from the perspective of a market participant that holds the asset or owes the liability).
- Fair value is a market-based measurement, not an entity-specific measurement. Therefore, it is measured using the assumptions that market participants would use when pricing the asset or liability at the measurement date, taking into account the characteristics of the asset or liability that market participants would take into account. Such characteristics include, for example:
 - (a) the condition and existing location of the asset; and
 - (b) legal restrictions, if any, on the sale or use of the asset (see paragraph 11.6(b)).
- The market price used to measure the fair value of the asset or liability shall not be adjusted for transaction costs (ie costs directly attributable to selling an asset or transferring a liability, such as brokerage fees).

 Transaction costs are not a characteristic of an asset or a liability; rather, they are specific to a transaction.
- 11.5 If location is a characteristic of the asset, the asset's market price shall be adjusted for transport costs.

Highest and best use for non-financial assets

- 11.6 A fair value measurement of a non-financial asset (eg property, plant and equipment) assumes a market participant would use the asset for its highest and best use, which takes into account:
 - (a) the asset's physical characteristics (eg the location or size of a property);
 - (b) any legal restrictions affecting the market participant's use of the asset (eg the zoning regulations applicable to a property); and
 - (c) whether the use makes financial sense (eg whether a particular use would generate an adequate rate of return for market participants or deliver sufficient goods or services to beneficiaries).
- 11.7 An entity's current use of a non-financial asset is presumed to be its highest and best use unless market or other factors suggest that it is highly probable that a different use by market participants would maximise the value of the asset. This exception would occur only when it is highly probable that, within one year of the asset's measurement date, the asset will either be sold to a buyer who would use the asset for a different use or be redeployed by the entity.

Valuation techniques

- When a price for an identical asset or liability is not observable, an entity measures fair value using another valuation technique. The entity shall use valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs.
- Three widely used valuation techniques are the market approach, the cost approach and the income approach.

 An entity shall use valuation techniques consistent with one or more of these approaches to measure fair value:
 - (a) the market approach uses prices and other relevant information generated by market transactions involving identical or comparable assets or liabilities. This would often be the case for financial assets and non-financial assets such as land, non-specialised buildings and non-specialised motor vehicles.
 - (b) the cost approach reflects the amount that would be required to replace an asset's service capacity (often referred to as current replacement cost).
 - (c) the income approach discounts future cash flows or income and expense items to their present value.
- 11.10 The cost approach considers that from the perspective of a market participant seller, the price that would be received for an asset is based on the cost to a market participant buyer to acquire or construct a substitute asset with the same age, technology, service capacity and condition as that of the asset held. That is because a market participant buyer would not pay more for an asset than the cost of replacing its service capacity. One reason the current replacement cost method may be used is that the asset is specialised and without readily observable market evidence.

Reliable measure of fair value

- 11.11 The fair value of an asset is reliably measurable if:
 - (a) a market price of an identical asset or a similar asset is observable close to the measurement date; or
 - (b) either:
 - (i) the variability in the range of reasonable fair value measures is insignificant for that asset; or
 - the probabilities of the various measures within the range can be reasonably assessed and used in estimating fair value.
- 11.12 For assets for which a market price of an identical asset or a similar asset is not observable, there are many situations in which the variability in the range of reasonable fair value measures is likely to be insignificant. Normally it is possible to estimate the fair value of an asset that an entity has acquired recently from an outside party. However, if the range of reasonable fair value measures is significant and the probabilities of the various measures cannot be reasonably assessed, the entity is precluded from measuring the asset at fair value.

Notes to Board members

Staff have made amendments to Section 12 to reflect the following 3 July 2025 AASB meeting decisions:

- Paragraph 12.2 was amended to remove the reference to education/training course material under development to reflect that these items should be classified as intangible assets rather than inventories.
- Paragraph 12.5 was amended to clarify that the accounting policy for initial measurement of donated inventory
 is applied to each individual item donated to the entity.
- Paragraphs 12.5 to 12.7 of ED 335 were relocated to Section 23 underneath paragraph 23.5 to keep the requirements relating to identifying and measuring a loss of service potential within the impairment section.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 12 is that the second and third sentences of paragraph 12.6 were relocated into paragraph 12.9 – to give more prominence that an entity may elect to exclude an allocation of production overhead costs from the costs of conversion.

Section 12: Inventories

Scope of this section

- 12.1 This section applies to inventories. Inventories are assets:
 - (a) in the form of materials or supplies to be consumed in producing goods or rendering services;
 - (b) held for sale or distribution in the ordinary course of operations; or
 - (c) in the process of production for such sale or distribution.
- 12.2 An entity's inventories might include food, clothing or goods held for distribution, stocks held in charity shops, information brochures, goods purchased for resale, consumable stores, maintenance materials, spare parts for plant and equipment, and work-in-progress.

Recording inventories

12.3 Inventories are recorded as an asset from when they are purchased by, or donated to, the entity.

Measurement of inventories

- 12.4 An entity shall measure inventories at cost. However, where a condition set out in paragraph 23.3 for assessing impairment is present, the entity shall measure:
 - (a) inventories held for distribution at cost less any loss of service potential; and
 - (b) all other inventories at the lower of cost and estimated selling price less costs to complete and sell.
- For the purposes of applying paragraph 12.4 for each item of inventory donated to the entity, that entity may elect to initially measure the cost of that item either at:
 - (a) its cost to the entity (which might be nil, a nominal amount or another significantly discounted amount); or
 - (b) its current replacement cost as at the date of donation. Any resulting increase in inventory is recorded as donation income(revenue) in accordance with Section 20.

Cost of inventories

12.6 An entity shall include in the cost of inventories all costs incurred in bringing the inventories to their present location and condition, including costs of purchase and, for inventories produced by the entity, costs of conversion (eg costs of converting raw materials and labour into finished goods).

Costs of purchase

12.7 The costs of purchase of inventories comprise the purchase price, import duties and other taxes (other than those subsequently recoverable by the entity from the taxing authorities) and transport, handling and other

costs directly attributable to the acquisition of finished goods, materials and services. Trade discounts, rebates and other similar items are deducted in determining the costs of purchase.

Costs excluded from inventories

- 12.8 Examples of costs excluded from the cost of inventories and recorded as expenses in the reporting period in which they are incurred are:
 - (a) abnormal amounts of wasted materials, labour or other production costs;
 - (b) storage costs, unless those costs are necessary during the production process before a further production stage;
 - (c) administrative overheads that do not contribute to bringing inventories to their present location and condition. However, if an entity elects under paragraph 12.9 to exclude production overhead costs from the costs of conversion of inventories, all administrative overheads would be excluded from the cost of inventories; and
 - (d) selling costs.
- 12.9 Notwithstanding paragraph 12.6, an entity may exclude from the costs of conversion a systematic allocation of production overhead costs incurred in the conversion process, such as a share of depreciation and maintenance costs of buildings and equipment used to produce the inventories. If so, this election shall be applied consistently to all inventories produced by the entity.

Cost of inventories of a service provider

12.10 To the extent that service providers have inventories, they measure them at the costs of their production. These costs consist primarily of the labour and other costs of personnel directly engaged in providing the service, including supervisory personnel and attributable overheads. Labour and other costs relating to sales and general administrative personnel are not included but are recorded as expenses in the reporting period in which they are incurred. The cost of inventories of a service provider does not include profit margins or non-attributable overheads that are often factored into prices charged by service providers.

Techniques for measuring cost, such as standard costing, retail method, most recent purchase price and specific identification

An entity may use techniques such as the standard cost method, the retail method or most recent purchase price for measuring the cost of inventories if the result approximates cost. The standard cost method takes into account normal levels of materials and supplies, labour, efficiency and capacity utilisation. Standard costs are regularly reviewed and, if necessary, revised in the light of current conditions. The retail method measures cost by reducing the sales value of the inventory by the appropriate gross margin percentage. Where feasible (eg for different items that ordinarily are not interchangeable) an entity may measure the cost of inventories by using specific identification of their individual costs.

Cost formulae

12.12 An entity shall measure the cost of inventories, other than those measured using specific identification of their individual costs, by using the first-in, first-out (FIFO) or weighted average cost formula. An entity shall use the same cost formula for all inventories having a similar nature and use to the entity. For inventories with a different nature or use, different cost formulae may be justified. The last-in, first-out (LIFO) method is not permitted by this Standard.

Recording as an expense

- 12.13 When inventories are sold or distributed, the entity shall record the carrying amount of those inventories as an expense in the reporting period in which the related sales revenue is recorded, or inventory distributed.
- 12.14 The amount of any write-down of inventories for impairment or loss of service potential and all losses of inventories shall be recorded as an expense in the reporting period in which the write-down or loss occurs.
- 12.15 If an item of inventory was donated without charge to the entity, and the entity elected under paragraph 12.5 to initially measure the item at its cost to the entity (nil), no expense is recorded on sale or distribution of the item.

Disclosures

- 12.16 An entity shall disclose the following:
 - (a) accounting policy information about the measurement of inventories, including the cost formulae used;
 - (b) the total carrying amount of inventories and the carrying amount in classifications appropriate to the entity;
 - (c) the amount of inventories recorded as an expense during the reporting period;
 - (d) the impairment losses for inventories recorded in profit or loss and the related line item(s) in the statement(s) of profit or loss and other comprehensive income; and
 - (e) the total carrying amount of inventories pledged as security for loans.
- 12.17 An entity shall disclose the basis or bases on which any loss of service potential of inventories held for distribution is assessed.
- Where, in accordance with paragraph 12.5(a), an entity initially measures at cost a donated item of inventory, it shall make the disclosures specified by paragraphs 15.30 and 15.31 for donated items.

Notes to Board members

- 1. Staff have made amendments to Section 13 to reflect the following 19 August 2025 AASB meeting decisions:
 - (a) to clarify the interaction between Section 8 and Section 13;
 - (b) to clarify that a joint arrangement held through a separate vehicle can be classified as a joint operation (paragraph 13.14 of this draft Standard);
 - (c) in relation to the equity method of accounting:
 - to require transaction costs incurred in acquiring an associate or joint venture to be expensed as incurred (paragraph 13.22 of this draft Standard);
 - not to articulate how the consideration paid for the associate or joint venture should be determined (paragraph 13.22 of this draft Standard); and
 - to allow, but not require, an investor to adjust an investee's financial statements to reflect the application of the investor's accounting policies (paragraph 13.22(f) of this draft Standard);
 - (d) to clarify that the election to measure the investment in an associate or a joint venture at fair value through other comprehensive income applies to all investments in associates or joint ventures, respectively (paragraph 13.20 of this draft Standard).
 - (e) to refer to a loss of control of the transferred assets instead of the transfer of the significant risks and rewards of ownership (paragraph 13.24 of this draft Standard);
 - (f) to require the elimination of an investor's share of the unrealised gains and losses arising from transactions between the investor and its joint operation (paragraphs 13.24 13.25 of this draft Standard, and the related heading);
 - (g) to require the impairment of investments in associates or joint ventures measured under the cost model to be recognised in accordance with Section 10: *Financial Instruments* (paragraph 13.17 of this draft Standard); and
 - (h) to clarify that when the fair value of an associate or joint venture measured under the fair value model is not reliably measurable, the carrying amount of the asset is estimated in a different way under the fair value model (paragraph 13.21 of this draft Standard).
- 2. In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 13 are:
 - (a) paragraphs 13.5-13.7 The definition and guidance about significant influence has been moved from Section 8 to Section 13. Staff have made some amendments to the ED 335 text.
 - (b) paragraph 13.14 Addition of an example to illustrate how a contractual arrangement might affect the classification of a joint arrangement as a joint venture or joint operation. Addition of guidance that a joint arrangement that is structured through a separate vehicle whose legal form does not confer separation between the parties and the separate vehicle is a joint operation. The source of these examples is AASB 11, paragraphs B23-B24.
 - (c) paragraph 13.18 Staff suggest to move the guidance about the treatment of pre- and post-acquisition dividends to the Basis for Conclusions instead of including it in the body of the Standard.
 - (d) Paragraph 13.19 the current drafting requires investments in associates and joint ventures to be initially measured at their transaction price. This reflects a presumption that, in most cases, the transaction price is likely to represent fair value at the acquisition date. However, staff note that where this presumption does

- not hold, a fair value revaluation adjustment would be recognised in profit or loss. As such, and to promote consistency with the initial measurement requirements for financial assets in Section 10, staff have amended to require investments in associates and joint ventures to be initially measured at fair value.
- (e) paragraph 13.22(c) Amendments to align the requirements for impairment testing of an equity-accounted investment with the impairment requirements applying to other Tier 3 financial assets. Paragraph 13.22(c) of ED 335 was deleted as the guidance is already provided in the leading sentence in paragraph 13.22.
- (f) paragraphs 13.22(c) & (g) Deletion of instructions about how financial instruments for which settlement neither is planned nor likely to occur in the foreseeable future and which, in substance, forms part of the investor's net investment in an associate or joint venture, are treated when considering impairment of the equity accounted investment and discontinued application of the equity method. The deletions are made on consideration that such circumstances are likely to be rare.
- (g) Removed the presentation requirement for associates (paragraph 13.24 in ED 335) on review, staff observed that this is the only instance in the Standard where the classification of an asset/liability as current/non-current has been specified. Further, the requirement did not similarly apply to the classification of a joint venture. If the Board decides that it would like to continue to specify this requirement, staff recommend that the requirement be included as part of Section 3: Statement of Financial Position and apply also in relation to joint ventures.

Section 13: Investments in Associates and Interests in Joint Arrangements

Scope of this section

- 13.1 This section applies to investors in associates and parties to a joint arrangement in:
 - (a) the consolidated financial statements of a parent entity; and
 - (b) the financial statements of an entity that is an investor in one or more associates, or a party to a joint arrangement, but in either case is not a parent.
- 13.2 Notwithstanding paragraph 13.1(b), this section does not apply to investments in associates and joint arrangements that are collectively classified as a single class of assets in accordance with the alternative treatment permitted by paragraph 8.3.
- An investor that is not a parent but has one or more investments in associates or joint ventures may, in addition, present separate financial statements. Paragraphs 8.30–8.35 specify the accounting for investments in associates and joint ventures in these separate financial statements, where prepared. Other parties to a joint arrangement, including a joint operator, shall account for its interest in the joint arrangement in accordance with the requirements of this section in those separate financial statements.

Associates

- An associate is an entity over which the investor has significant influence. An associate may be an unincorporated entity, such as a partnership.
- 13.5 Significant influence is the power to participate in the financial and operating policy decisions of investee but is not control or joint control of those policies.
- An entity applies judgement in assessing whether it has significant influence. If an entity holds, directly or indirectly (eg through subsidiaries), 20 per cent or more of the voting power of investee, it is presumed that the entity has significant influence, unless it can clearly be demonstrated that this is not the case. Conversely, if the entity holds, directly or indirectly, less than 20 per cent of the voting power of the investee, it is presumed that the entity does not have significant influence, unless such influence can clearly be demonstrated. The existence and effect of potential voting rights currently exercisable or convertible (including potential voting rights held by other entities) are considered when assessing whether an entity has significant influence.
- 13.7 The existence of significant influence by an entity is usually evidenced in one or more of the following ways:
 - (a) representation on the board of directors or equivalent governing body of the investee;
 - (b) participation in policy-making processes, including participation in decisions about distributions of any surpluses;
 - (c) material transactions between the two entities;
 - (d) interchange of managerial personnel; and
 - (e) provision of essential technical information.

Joint arrangements

- Joint control is the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require the unanimous consent of the parties sharing control.
- An entity that is a party to an arrangement shall assess whether the contractual arrangement gives all the parties, or a group of the parties, control of the arrangement collectively. All the parties, or a group of the parties, control the arrangement collectively when they must act together to direct the activities that significantly affect the returns of the arrangement (that is, the relevant activities). A party with joint control of an arrangement can prevent any of the other parties, or a group of the parties, from controlling the arrangement.
- 13.10 A joint arrangement is an arrangement of which two or more parties have joint control. Joint arrangements can take the form of a joint operation or a joint venture.
- A joint operation is a joint arrangement whereby the parties that have joint control of the arrangement ('joint operators') have rights to the assets, and obligations for the liabilities, relating to the arrangement. A joint operation involves the use of the assets and other resources of the joint operators but does not require the establishment of a corporation, partnership or other entity, or a financial structure separate from the parties themselves. Each joint operator uses its own property, plant and equipment and carries its own inventories. It also incurs its own expenses and liabilities and raises its own finance, which represent its own obligations. The joint operation's activities may be carried out by the joint operator's employees alongside that joint operator's similar activities. The joint arrangement agreement usually provides a means by which the revenue from the sale of the joint product and any expenses incurred in common are shared among the joint operators.
- 13.12 A joint venture is a joint arrangement whereby the parties that have joint control of the arrangement ('joint venturers') have rights to the net assets of the arrangement.
 - 13.13 The classification of a joint arrangement as a joint operation or a joint venture depends upon the rights and obligations of the parties to the arrangement. An entity assesses its rights and obligations by considering the structure and legal form of the arrangement, the terms agreed by the parties in the contractual arrangement and, when relevant, other facts and circumstances.13.14 A joint arrangement in which the assets and liabilities relating to the arrangement are held in a separate vehicle can be either a joint venture or a joint operation as, for example, the terms agreed by the parties in their contractual arrangement and other facts and circumstances can override the rights and obligations conferred by the legal form of the separate vehicle. A joint arrangement that is structured through a separate vehicle is a joint operation. A joint arrangement that is not structured through a separate vehicle is a joint operation.

Measurement of investments in associates and joint ventures

- An entity shall account for its investments in associates and joint ventures in its consolidated financial statements using the equity method in paragraph 13.22.
- Where consolidated financial statements are not prepared, an entity shall account for its investments in associates and joint ventures using:
 - (a) the cost model
 - (b) the fair value model; or
 - (c) the equity method.

A different policy may be elected for each class of assets.

Cost model

- 13.17 Under the cost model, an investment in an associate or a joint venture, is measured at cost less any accumulated impairment losses recorded in accordance with Section 10.
- 13.18 Dividends and other distributions received are recorded as income in profit or loss when the entity has a legal right to the payment.

Fair value model

13.19 Under the fair value model, an investment in an associate or joint venture is initially measured at its fair value excluding transaction costs such as legal fees or other fees incurred as a direct result of buying the asset. Section 11 provides guidance on determining fair value.

- 13.20 After initial recording, an investor shall continue to measure investments in associates or joint ventures at fair value. Changes in fair value shall be recorded in profit or loss, except that an investor may make an irrevocable election, upon initial recording of its first investment in an associate, and first interest in a joint venture, to record these changes in other comprehensive income. Any such election applies to the entire class of instruments.
- An investor using the fair value model shall discontinue measuring an investment in an associate or joint venture that is represented by unlisted equity instruments at fair value when:
 - (a) a quoted price in an active market is not observable for an identical equity instrument, or a similar equity instrument, close to the measurement date;
 - (b) the cost of the equity instrument does not represent the best estimate of its fair value (refer paragraphs 10.15—10.17); and
 - (c) the variability in the range of reasonable fair value measures is significant, and the probabilities of the various measures cannot be reasonably assessed.

Such investments shall be measured in accordance with paragraph 13.17. In these instances, the carrying amount of the investment on the date its fair value was last determinable shall be regarded as its cost. An entity shall resume measuring the investment in an unlisted equity instrument at fair value when the conditions in (a)—(c) are no longer relevant.

Equity method

- 13.22 Under the equity method of accounting, an investment in an associate or a joint venture is initially measured at the investor's share of the carrying amounts of the net assets of the investee. The difference between this amount and the consideration paid (excluding any transaction costs) is recognised directly in equity, and is subsequently adjusted to reflect the investor's share of the profit or loss and other comprehensive income of the investee, by applying the following principles:
 - (a) distributions and other adjustments to carrying amount. Distributions received from the investee associate or joint venture reduce the carrying amount of the investment. Adjustments to the carrying amount might also be required as a consequence of changes in the investee's equity arising from items of other comprehensive income.
 - (b) potential voting rights. Although potential voting rights are considered in deciding whether significant influence or joint control exists, an investor shall measure its share of profit or loss and other comprehensive income of the investee and its share of changes in the investee's equity on the basis of present ownership interests. Those measurements shall not reflect the possible exercise or conversion of potential voting rights.
 - (c) *impairment*. If there is objective evidence that an investment in an investee is impaired, an investor shall record impairment in accordance with Section 10.
 - (d) *investor's transactions with investees.* The investor shall eliminate unrealised profits and losses resulting from upstream (investee to investor) and downstream (investor to investee) transactions to the extent of the investor's ownership interest in the investee. Unrealised losses on such transactions might provide evidence of an impairment of the asset transferred.
 - (e) date of investee's financial statements. In applying the equity method, the investor shall use the financial statements of the investee as of the same date as the financial statements of the investor unless doing so is impracticable. If it is impracticable, the investor shall use the most recent available financial statements of the investee, with adjustments made for the effects of any significant transactions or other events occurring between the reporting period ends. In any case, the difference between the date of the investor's and investee's financial statements shall not exceed three months, and both the length of the reporting periods and any difference between the dates of the financial statements shall be the same from period to period.
 - (f) *investee's accounting policies*. If the investee uses different accounting policies from those of the investor, the investor may adjust the investee's financial statements to reflect the investor's accounting policies for the purpose of applying the equity method unless doing so is impracticable.
 - (g) losses in excess of investment. If an investor's share of losses of an investee equals or exceeds the carrying amount of its investment in the investee, the investor shall discontinue recording its share of further losses. After the investor's interest is reduced to zero, the investor shall record additional losses only to the extent that the investor either has incurred legal or constructive obligations and records a provision (see Section 19) or has made payments on behalf of the investee. If the investee subsequently reports profits, the investor shall resume recording its share of those profits only after its share of the profits equals the share of losses not recorded.

Accounting for interests in joint operations

- 13.23 In respect of its interests in joint operations, a joint operator shall record in its financial statements:
 - its assets, including its share of the jointly controlled assets, classified according to the nature of the assets;
 - (b) its liabilities, including its share of any liabilities owed jointly with the other parties in relation to the joint arrangement;
 - (c) any revenue from the sale or use of its share of the output of the joint arrangement, together with its share of any expenses incurred by the joint arrangement; and
 - (d) any expenses it has incurred in respect of its interest in the joint arrangement.

Transactions between the entity and a joint arrangement

- When an entity that is a joint venturer or joint operator contributes or sells assets to the joint arrangement, the record of any portion of a gain or loss from the transaction shall reflect the substance of the transaction. While the assets are retained by the joint arrangement, and provided the entity has lost control of the transferred assets, the entity shall record only the portion of the gain or loss attributable to the other investors' interests. The entity shall record the full amount of any loss when the contribution or sale provides evidence of an impairment loss.
- When a joint venturer or joint operator purchases assets from a joint arrangement, that entity shall not record its share of the profits of the joint arrangement from the transaction until it resells the assets to an independent party. The entity shall record its share of the losses resulting from these transactions in the same way as profits, except that losses shall be recorded immediately if they represent an impairment loss.

If a party does not have joint control

- 13.26 An entity that participates in, but does not have joint control of, a joint venture shall account for its interest in the arrangement in accordance with Section 10 unless it has significant influence over the joint venture. Where an entity has significant influence over the joint venture, the entity shall account for it in accordance with this section (as an investment in an associate) or Section 8 (together with other investments in notable relationship entities), whichever applicable.
- An entity that participates in, but does not have joint control of, a joint operation shall account for its interest in the arrangement in accordance with paragraph 13.23 if that party has rights to the assets, and obligations for the liabilities, relating to the joint operation. If an entity that participates in, but does not have joint control of, a joint operation does not have rights to the assets, and obligations for the liabilities, relating to that joint operation, it shall account for its interest in the joint operation in accordance with the sections applicable to that interest.

Disclosures

- 13.28 In addition to the disclosures specified by Section 28, an entity shall disclose the following:
 - (a) accounting policy information for investments in associates and joint ventures;
 - (b) the total carrying amount of investments in associates;
 - (c) the total carrying amount of investments in joint ventures; and
 - (d) if the entity is an investor in one or more joint ventures, the aggregate amount of its commitments relating to those entities, including its share of the commitments incurred jointly with other parties.
- 13.29 An entity shall disclose the following information about each investment in associate and interest in joint venture accounted for using the cost model:
 - (a) its name;
 - (b) a description of its relationship with the reporting entity;
 - a clear and concise description of its primary purpose and an indication of the nature of its operations;
 - (d) whether the entity prepares audited or reviewed financial statements; and
 - (e) for investments in associates only the total amount of dividends and other distributions recorded as income for the period.

- 13.30 For investments in associates and joint ventures accounted for using the fair value model, an investor shall make the disclosures required by paragraphs 10.27 and 10.29.
- An entity shall disclose separately for investments in associates, and interests in joint ventures, accounted for using the equity method:
 - (a) its share of the profit or loss;
 - (b) its share of any discontinued operations; and
 - (c) the total fair value of its investments for which a quoted market price is available.

Question 6 to Board members

On re-examination of the requirements in ED 335 for entities that adopt the fair value model for their investment properties, staff note that paragraph 14.9 requires an entity to measure a particular investment property using the cost model. The property's carrying amount when its fair value ceased being reliably measurable becomes its cost until reliable measurement of the property's fair value on a continuing basis becomes possible. This requirement differs from the Tier 2 requirements, which require an entity to continue to measure investment property using the cost model until the disposal of the investment property, based on an initial 'permanent' assessment of ability to reliably measure fair value on a continuing basis, rather than allowing an entity to reapply the fair value model (refer to paragraph 53 of AASB 140 *Investment Property*). Staff consider that the drafting was unintentional given that the Board decided the Tier 3 requirements for investment property should be generally consistent with Tier 2 requirements. Staff also consider that aligning with Tier 2 requirements to require investment property, where its fair value cannot be measured reliably on a continuing basis, to be measured using the cost model until disposal would reduce complexity, given that entities would not need to determine when a property would once again be reliably measurable to reapply the fair value model. Therefore, staff recommend removing that requirement from paragraph 14.9 as reflected in the amendments.

Do Board members agree with the staff recommendation that if an entity determines that the fair value of an investment property is not reliably measurable on a continuing basis, the entity shall measure that investment property using the cost model in Section 15 until disposal of the investment property?

If not, what do Board members suggest?

Notes to Board members

Staff have made an amendment to Section 14 to reflect the following 3 July 2025 AASB meeting decision:

• Paragraph 14.15(c) was amended to not require disclosures of commitments for repairs, maintenance or enhancements for investment property.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 14 are:

- Paragraph. 14.9 of ED 335 was merged with paragraph 14.7 for conciseness.
- Staff noted in Agenda Paper 5.5 presented at the July 2025 Board meeting that stakeholder feedback raised questions about whether paragraphs 14.10 and 14.12 were mutually exclusive, particularly in cases where a change in use or transfer of property could result in reclassification. In that paper, staff clarified that paragraph 14.12 would be mutually exclusive from reclassification, as it pertains to derecognition rather than changes in use. Staff suggest adding new paragraph 14.11 to clarify the accounting treatment for transfers of investment property—whether measured at cost or fair value—to owner-occupied property or inventories. Staff have drawn the drafting of paragraph 14.11 from AASB 140 paragraphs 59 and 60.
- Paragraph 14.15(e) disclosures were removed, as a similar disclosure requirement was also proposed in paragraph 15.28(c) of ED 335 namely, that an entity with investment property whose fair value cannot be measured reliably, is required to disclose the fact and reasons why.

Section 14: Investment Property

Scope of this section

14.1 This section applies to investment property except when paragraph 1.3 or another section of this Standard requires or permits a different accounting treatment.

- Investment property is property (land or a building, or part of a building, or both) held by the owner to earn rentals or for capital appreciation or both, instead of for:
 - (a) use in the production or supply of goods or services or for administrative purposes ('owner-occupied property'); or
 - (b) sale in the ordinary course of operations.

In relation to (a), a property's generation of incidental rental revenue does not preclude classifying that property as 'owner-occupied'.

14.3 The accounting for owner-occupied property is set out in Section 15. The accounting for property held for sale in the ordinary course of operations is addressed by Section 12. Mixed-use property shall be classified and accounted for as property, plant and equipment in accordance with Section 15.

Recording an investment property

An entity shall record an investment property as an asset from when it is purchased by, or donated to, the entity.

Initial measurement

- An investment property shall initially be measured at its cost. However, if an investment property was donated to the entity, the entity may elect to initially measure the property either at:
 - (a) its cost to the entity (which might be nil, a nominal amount or another significantly discounted amount); or
 - (b) its fair value as at the date of donation, measured in accordance with Section 11. Any resulting increase in investment property is recorded as donation income (revenue) in accordance with Section 20.

14.6 The cost of a purchased investment property comprises its purchase price and any directly attributable expenditure such as legal and brokerage fees, property transfer taxes and other transaction costs. An entity shall determine the cost of a self-constructed investment property in accordance with paragraphs 15.5 and 15.6.

Subsequent measurement

After initial recording, an entity shall apply either the cost model in Section 15 or the fair value model in paragraph 14.8 as its accounting policy and, subject to paragraph 14.9, shall apply that policy to an entire class of investment property. Where an entity initially measures a donated investment property at fair value, this amount shall be regarded as its cost for the purposes of applying the cost model.

Fair value model

- 14.8 Under the fair value model, investment properties are measured at fair value, in accordance with Section 11, as at each reporting date with changes in fair value recorded in profit or loss. An entity that changes its accounting policy from the cost model to the fair value model for a class of investment properties shall not subsequently revert to the cost model for those assets.
- When the fair value of a particular investment property cannot be measured reliably on a continuing basis, the entity shall measure that item using the cost model in Section 15 until disposal of the investment property. Applying the cost model to particular investment properties in the circumstances described in this paragraph is not a change in accounting policy.

Transfers to, or from, investment property

14.10 An entity shall transfer a property to, or from, investment property only when there is a change in use. A change in use occurs when the property meets, or ceases to meet, the definition of investment property and there is evidence of the change in use.

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14.11 When an entity uses the cost model, transfers between investment property, inventories and owner-occupied property do not change the cost or other carrying amount of the property transferred. For a transfer from investment property measured under the fair value model to inventories or owner-occupied property, the property's fair value at the date of change in use shall be regarded as its cost for the purposes of applying Section 15 or Section 12.

Ceasing to record an investment property

- 14.12 An entity shall cease recording an investment property when the property is:
 - (a) sold or otherwise disposed of; or
 - (b) permanently withdrawn from use and no future economic benefits are expected from its disposal.
- 14.13 An entity shall determine the gain or loss arising from ceasing to record an investment property as the difference between the net disposal proceeds, if any, and the carrying amount of the property. An entity shall record the gain or loss in profit or loss in the reporting period in which the property ceases to be recorded as an asset.

Disclosures

- 14.14 An entity shall disclose the information specified by paragraphs 15.27 and 15.28 for investment properties measured under the cost model.
- 14.15 An entity shall disclose the following information for investment property measured under the fair value model:
 - (a) the extent to which the fair value is based on a valuation by an independent valuer;
 - (b) the existence and amounts of restrictions on the realisability of investment property or the remittance of income and proceeds of disposal;
 - (c) the amount of contractual commitments to purchase, construct or develop investment property; and
 - (d) net gains or losses from fair value adjustments.
- Where, in accordance with paragraph 14.5(a), an entity initially measures at cost a donated investment property, it shall make the disclosures specified by paragraphs 15.30 and 15.31 for that investment property. However, for a donated investment property, it is unnecessary to comply with the requirement in paragraph 15.30(b)(i) to disclose the class of assets to which the donated asset relates.

Question 7 to Board members

On re-examination of the requirements in ED 335, staff note that paragraph 15.28(a) requires disclosure of the nature and amount of loans for which items of property, plant and equipment are pledged as security. ED 335 included this disclosure, which was based on the New Zealand Tier 3 Standard relating to loans (slightly different from Tier 2 requirements, which refers to liabilities). However, having regard to the Board's principle that Tier 2 disclosures should be the cap for developing Tier 3 disclosures where recognition and measurement requirements are similar, staff recommend removing the disclosures.

Do Board members agree with the staff recommendation to remove the disclosures to require the nature and amount of loans for which items of property, plant and equipment are pledged as security, as reflected in the tracked changes in paragraph 15.28(a)?

If not, what do Board members suggest?

Notes to Board members

Staff have made amendments to Section 15 to reflect the following 3 July 2025 AASB meeting decisions:

- Paragraph 15.1 was amended to clarify that parts of Section 15 also apply to investment property for which an
 entity has chosen the cost model.
- Paragraph 15.9 was amended to remove the reference to software, and combine land and buildings as a class of property, plant and equipment.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 15 are:

- Paragraph 15.7 was added to bring prominence to the election that an entity may exclude from the costs of constructing an item of property, plant and equipment a systematic allocation of overhead costs incurred in the construction process and the depreciation of items of property, plant and equipment and intangible assets used in their construction. This amendment aligns with the staff-suggested change in Section 12 to permit an entity to exclude certain cost from the costs of conversion.
- Paragraph 15.8 was amended to reduce verbosity and to remove the detail about the option for measuring property, plant and equipment on the cost model or revaluation model applying regardless of whether the item was donated. Staff consider that the information should be included in the Basis for Conclusions. A similar sentence in 16.12 has also been removed for the same reason.
- Paragraph 15.13 was amended to remove reference to deducting accumulated impairment losses when determining the revalued amount since the Board decided the Tier 3 impairment requirements should apply only to non-financial assets (other than inventory) if they are subsequently measured at cost or deemed cost (see minutes of the 7 April 2022 Board meeting). Items of property, plant and equipment measured at deemed cost (due to an inability to reliably measure their fair value) are addressed instead in paragraph 15.14, which requires application of the cost model, including, per paragraph 15.12, deduction of any accumulated impairment losses.
- Paragraph 15.14 added based on the deleted paragraph 15.8 of ED 335 to give further guidance on the accounting for when the fair value of an item of property, plant, and equipment cannot be measured reliably.
- Paragraph 15.27(c) was amended to remove the requirement to disclose impairment losses recorded in other comprehensive income, consistent with the Board's decision that impairment assessments do not apply to non-financial assets measured using the revaluation model.
- Paragraph 15.28(c) was amended to align with AASB 1060 para. 135(c), which refers to individual investment property, rather than all investment properties, whose fair value cannot be reliably measured, and disclosing the reasons why for those items of investment property.

Section 15: Property, Plant and Equipment

Scope of this section

- 15.1 This section applies to:
 - (a) property, plant and equipment; and
 - (b) investment property the fair value of which cannot be measured reliably on a continuing basis and other investment property measured under the cost model;

except when paragraph 1.3 or another section of this Standard requires or permits a different accounting treatment

- 15.2 Property, plant and equipment are tangible assets that are:
 - (a) held for use in the production or supply of goods or services, for rental to others, or for administrative purposes; and
 - (b) expected to be used during more than one reporting period.

Recording an item of property, plant and equipment

15.3 An entity shall record an item of property, plant and equipment as an asset from when it is purchased by, or donated to, the entity.

Initial measurement

- 15.4 An item of property, plant and equipment shall initially be measured at its cost. However, if an item of property, plant and equipment was donated to the entity, that entity may elect to initially measure the item either at:
 - (a) its cost to the entity (which might be nil, a nominal amount or another significantly discounted amount); or
 - (b) its fair value as at the date of donation, measured in accordance with Section 11. Any resulting increase in property, plant and equipment is recorded as donation income(revenue) in accordance with Section 20.

Elements of cost

- 15.5 The cost of an item of property, plant and equipment comprises all of the following:
 - (a) its purchase price, including legal and brokerage fees, import duties and non-refundable purchase taxes, after deducting trade discounts and rebates;
 - (b) any costs directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management (eg initial delivery and handling and installation costs).; and
 - (c) the initial estimate of the cost of dismantling and removing the item and restoring the site on which it is located (ie "make good" obligation).
- 15.6 The following costs are not costs of an item of property, plant and equipment and shall be recorded as an expense when they are incurred:
 - (a) costs of opening a new facility;
 - (b) costs of introducing a new good or service (including costs of advertising and promotional activities) and costs of operating in a new location or with a new class of beneficiaries (including costs of staff training); and
 - (c) administration and other general overhead costs.
- 15.7 Notwithstanding paragraph 15.5, an entity may exclude from the costs of constructing an item of property, plant and equipment a systematic allocation of overhead costs incurred in the construction process and the depreciation of items of property, plant and equipment and intangible assets used in their construction. If so, this election shall be applied consistently to all property, plant and equipment constructed by the entity.

Subsequent measurement

- An entity shall choose either the cost model in paragraph 15.12 or the revaluation model in paragraph 15.13 as its accounting policy and shall apply that policy to an entire class of property, plant and equipment. Where an entity initially measures an item of donated property, plant and equipment at fair value, this amount shall be regarded as its cost for the purposes of applying the cost model.
- 15.9 A class of property, plant and equipment is a grouping of property, plant and equipment of a similar nature or function. Possible classes of property, plant and equipment are:
 - (a) land;
 - (b) land and buildings;
 - (c) motor vehicles;
 - (d) furniture and fixtures;
 - (e) office equipment;
 - (f) computers; and
 - (g) machinery.
- 15.10An entity that changes its accounting policy from the cost model to the revaluation model for a class of property, plant and equipment shall not subsequently revert to the cost model for those assets.
- An entity shall record the costs of day-to-day servicing of an item of property, plant and equipment in profit or loss in the reporting period in which the costs are incurred.

Cost model

15.12 An entity shall measure an item of property, plant and equipment after initial recording at cost less any accumulated depreciation and any accumulated impairment losses recorded in accordance with Section 23.

Revaluation model

- 15.13 An entity shall measure an item of property, plant and equipment after initial recording whose fair value can be measured reliably at a revalued amount, being its fair value as at the date of the revaluation less any subsequent accumulated depreciation. Revaluations shall be made with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value at the end of the reporting period. Section 11 provides guidance on determining fair value.
- When the fair value of an item within a class of revalued property, plant, and equipment cannot be measured reliably, the entity shall measure that item using the cost model until the item is once again reliably measurable. The item's carrying amount when its fair value ceased being reliably measurable shall be regarded as its cost for the purpose of applying the cost model. Applying the cost model to an item of property, plant and equipment in the circumstances described in this paragraph is not a change in accounting policy.

Recording revaluation increases and decreases

- 15.15 If the carrying amount of a class of assets is increased as a result of a revaluation, the revaluation increase shall be recorded in other comprehensive income and accumulated in equity under the heading of revaluation surplus. However, the revaluation increase shall be recorded in profit or loss to the extent that it reverses a revaluation decrease of the same class of assets previously recorded in profit or loss.
- 15.16 If the carrying amount of a class of assets decreased as a result of a revaluation, the revaluation decrease shall be recorded in profit or loss. However, the revaluation decrease shall be recorded in other comprehensive income to the extent of any credit balance existing in the revaluation surplus in respect of that same class of assets. The revaluation decrease recorded in other comprehensive income reduces the amount accumulated in equity under the heading of revaluation surplus.

Depreciation

- 15.17 An entity shall allocate the depreciable amount of an asset on a systematic basis over its useful life. The depreciation charge for each period shall be recorded in profit or loss unless another section of this Standard requires or permits the cost to be recorded as part of the cost of an asset. For example, the depreciation of manufacturing property, plant and equipment might be included as part of the costs of conversion of inventories (see Section 12). Depreciation of an asset begins when it is available for use, ie when it is in the location and condition necessary for it to be capable of operating in the manner intended by management.
- 15.18 If the major components of an item of property, plant and equipment have significantly different useful lives or patterns of consumption of economic benefits, an entity shall allocate the initial cost of the asset to its major components and depreciate each such component separately over its useful life. Other assets are depreciated over their useful lives as a single asset. Land is considered to have an unlimited useful life and is not depreciated.

Depreciable amount and depreciation period

- 15.19 An entity shall consider all the following factors in determining the useful life of an asset:
 - (a) the expected usage of the asset, assessed by reference to the asset's expected capacity or physical output;
 - (b) expected physical wear and tear;
 - (c) technical or commercial obsolescence arising from changes or improvements in production, or from a change in the external demand for the output (goods or services) of the asset; and
 - (d) legal or similar limits on the use of the asset, such as the expiry dates of related leases.
- 15.20 If an asset has been damaged physically or its capacity to provide services has been affected adversely as a result of either:
 - (a) the entity having changed its strategy; or
 - (b) being affected by a reduction in external demand for its services,

this may indicate that the residual value, useful life or pattern of consumption of the future economic benefits embodied in the asset has changed since the most recent annual reporting date. If such indicators are present, the entity shall review its previous estimates and, if current expectations differ, amend the residual value, depreciation method or useful life. The entity shall account for the change in residual value, depreciation method or useful life as a change in an accounting estimate in accordance with Section 9.

Depreciation of an asset ceases when the asset ceases to be recorded. Depreciation does not cease when the asset becomes idle or is retired from active use unless the asset is fully depreciated. However, under usage methods of depreciation the depreciation charge can be nil while there is no production.

Depreciation method

- 15.22 An entity shall select a depreciation method that reflects the pattern in which it expects to consume the asset's future economic benefits. Possible depreciation methods include the straight-line method, the diminishing balance method and a method based on usage such as the units of production method.
- 15.23 If there is an indication that there has been a significant change since the last annual reporting date in the pattern in which an entity expects to consume an asset's future economic benefits, the entity shall review its present depreciation method and, if current expectations differ, change the depreciation method to reflect the new pattern. The entity shall account for the change as a change in an accounting estimate in accordance with Section 9.

Ceasing to record an item of property, plant and equipment

- 15.24 An entity shall cease recording an item of property, plant and equipment when:
 - (a) it is sold or otherwise disposed of; or
 - (b) no future economic benefits are expected from its use or disposal.
- 15.25 For the purposes of paragraph 15.24(b), an entity needs to consider the possibility that no future economic benefits are expected from the use or disposal of an asset only when:
 - (a) the asset has been damaged physically; or
 - (b) the entity has changed its strategy or been affected by a reduction in external demand for its services and in either case the asset's capacity to provide services might have been affected adversely as a result.
- 15.26 An entity shall determine the gain or loss arising from ceasing to record an item of property, plant and equipment as the difference between the net disposal proceeds, if any, and the carrying amount of the item. An entity shall record the gain or loss in profit or loss in the reporting period in which the item ceases to be recorded as an asset. The entity shall not classify such a gain as revenue.

Disclosures

- 15.27 An entity shall disclose the following for each class of property, plant and equipment, and for investment property measured under the cost model:
 - (a) the measurement bases used;
 - (b) the carrying amount at the beginning and end of the reporting period;
 - (c) increases or decreases resulting from revaluations recorded in other comprehensive income under paragraphs 15.15 and 15.16;
 - (d) impairment losses recorded in profit or loss and the related line item(s) in the statement(s) of profit or loss and other comprehensive income; and
 - (e) depreciation.
- 15.28 An entity shall also disclose:
 - (a) the existence and carrying amounts of property, plant and equipment to which the entity has restricted title or that is pledged as security for loans;
 - (b) the amount of contractual commitments for the acquisition of property, plant and equipment; and
 - (c) if the entity has investment property whose fair value cannot be measured reliably on a continuing basis, it shall disclose that fact and the reasons why fair value cannot be measured reliably for those items of investment property.

- 15.29 If items of property, plant and equipment are stated at revalued amounts, an entity shall disclose:
 - (a) the effective date of the revaluation; and
 - (b) whether an independent valuer was involved.
- 15.30 Where, in accordance with paragraph 15.4(a), an entity initially measures at cost a donated item of property, plant and equipment, it shall disclose, for each material item, information that helps users of financial statements to assess:
 - (a) the entity's dependence on donations of property, plant and equipment; and
 - (b) the nature and terms of the donation arrangement, including:
 - (i) a description of the donated asset and the class of assets to which it relates;
 - (ii) any amounts owing to the donor at the reporting date; and
 - (iii) restrictions on the use of the donated asset imposed by the donor.
- 15.31 The disclosures in paragraph 15.30:
 - (a) shall be aggregated for donated assets of a similar nature; and
 - (b) need not be made in respect of any donated assets measured using the revaluation model.

An entity shall consider the level of detail necessary to enable those assessments by users of financial statements. The disclosures shall be aggregated or disaggregated so that useful information is not obscured by either the inclusion of a large amount of insignificant detail or the aggregation of items with substantially different characteristics.

Question 8 to Board members

On re-examination of the requirements in ED 335, staff note that entities are required by paragraph 16.26(d) of ED 335 to disclose the line item(s) in the statement(s) of profit or loss and other comprehensive income (or statement of income and retained earnings, if presented) in which any amortisation of intangible assets is included. However, an equivalent disclosure is not required for the depreciation amounts for investment property or property, plant and equipment in Sections 14 and 15, respectively. While the disclosure in paragraph 16.26(d) of ED 335 reflects the same Tier 2 disclosures requirements in AASB 1060.137(d), staff prefer internal consistency between sections and given other sections do not require the same disclosures, staff recommend removing the requirement to disclose the line item(s) in the statement(s) of profit or loss and other comprehensive income (or statement of income and retained earnings, if presented) in which any amortisation of intangible assets is included, as reflected via tracked changes in paragraph 16.26(d) of ED 335.

Do Board members agree with the staff recommendation to remove the disclosure requirement in paragraph 16.26(d) of ED 335?

If not, what do Board members suggest?

Question 9 to Board members

On re-examination of the requirements in ED 335, similar to Section 15, staff note that paragraph 16.27(a) requires disclosure of the nature and amount of loans for which intangible assets are pledged as security. ED 335 included this disclosure, which was based on the New Zealand Tier 3 Standard relating to loans (slightly different from Tier 2 requirements, which refers to liabilities) However, having regard to the Board's principle that Tier 2 disclosures should be the cap for developing Tier 3 disclosures where recognition and measurement requirements are similar, staff recommend removing the disclosures.

Do Board members agree with the staff recommendation to remove the disclosures to require the nature and amount of loans for which intangible assets are pledged as security, as reflected in tracked changes in paragraph 16.27(a)?

If not, what do Board members suggest?

Notes to Board members

Staff have made amendments to Section 16 to reflect the following 19 August 2025 AASB meeting decisions:

Paragraph 16.29(b), was amended remove the disclosure requirement regarding whether an independent valuer
was involved when intangible assets are stated in revalued amounts.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 16 are:

- Paragraph 16.6 of ED 335 was removed to keep entity combination guidance within that Section.
- Paragraph 16.12 of ED 335 was deleted as the guidance on where a donated intangible asset is initially measured at fair value, and that amount is regarded as its cost for the purpose of applying the cost model, is relocated to paragraph 16.10 to be consistent with Sections 14 and 15.
- Paragraph 16.12, relating to the guidance that if an intangible asset in a class of revalued intangible assets cannot be revalued when an intangible asset ceases being traded in an active market, was relocated to paragraph 16.15 within the revaluation section.
- Paragraph 16.14 was amended to remove reference to deducting accumulated impairment losses when determining the revalued amount since the Board decided the Tier 3 impairment requirements should apply only to non-financial assets (other than inventory) if they are subsequently measured at cost or deemed cost.
- Paragraph. 16.18 of ED 335 was deleted and moved to the end of paragraph 16.18 as both paragraphs provide guidance on treating the useful lives of all intangible assets as finite.
- Paragraphs 16.24 and 16.25 were added to provide guidance about ceasing recording an intangible asset, which would have otherwise required an entity to refer to Section 15.
- Paragraph 16.26(c) was amended to remove the requirement to disclose impairment losses recorded in other comprehensive income, consistent with the Board's decision that impairment assessments do not apply to non-financial assets measured using the revaluation model.

Section 16: Intangible Assets

Scope of this section

- 16.1 This section applies to intangible assets, except when paragraph 1.3 or another section of this Standard requires or permits a different accounting treatment.
- An intangible asset is an identifiable non-monetary asset without physical substance. Such an asset is identifiable when it either:
 - (a) is separable, ie capable of being separated or divided from the entity and sold, transferred, licensed, rented or exchanged, either individually or together with a related contract, asset or liability; or
 - (b) arises from contractual or other legal rights, regardless of whether those rights are transferable or separable from the entity or from other rights and obligations.

Recording an intangible asset

16.3 An entity shall record an intangible asset as an asset from when it is purchased by, or donated to, the entity.

Initial measurement

- An intangible asset shall initially be measured at cost. However, if an intangible asset was donated to the entity, that entity may elect to initially measure the asset either at:
 - (a) its cost to the entity (which might be nil, a nominal amount or another significantly discounted amount); or
 - (b) its fair value as at the date of donation, measured in accordance with Section 11. Any resulting increase in intangible assets is recorded as donation income (revenue) in accordance with Section 20.

Elements of cost

- 16.5 The cost of an acquired intangible asset comprises:
 - (a) its purchase price, including import duties and non-refundable purchase taxes, after deducting trade discounts and rebates; and
 - (b) any directly attributable cost of preparing the asset for its intended use.

Internally generated intangible assets

- An entity shall record expenditure incurred internally on an intangible item, including all expenditure for both research and development activities, as an expense when it is incurred.
- As examples of applying paragraph 16.6, an entity shall write off expenditure on the following items immediately as an expense and shall not record such expenditure as intangible assets:
 - (a) internally generated brands, logos, publishing titles, customer lists and items similar in substance;
 - (b) start-up activities (ie start-up costs), which include establishment costs such as legal and secretarial costs incurred in establishing a legal entity, expenditure to open a new facility (ie pre-opening costs) and expenditure for starting new operations or launching new products or processes (ie pre-operating costs);
 - (c) training activities;
 - (d) advertising and promotional activities; and
 - (e) relocating or reorganising part or all of an entity.
- Paragraph 16.7 does not preclude recording a prepayment as an asset when payment for goods or services has been made in advance of the delivery of the goods or the rendering of the services.

Past expenses not to be recorded (reinstated) as an asset

Expenditure on an intangible item recorded as an expense shall not subsequently be recorded as part of the cost of an asset.

Subsequent measurement

- 16.10 An entity shall choose either the cost model in paragraph 16.13 or the revaluation model in paragraphs 16.14 and 16.15 as its accounting policy and shall apply that policy to an entire class of intangible assets. Where an entity initially measures a donated intangible asset at fair value, this amount shall be regarded as its cost for the purpose of applying the cost model.
- A class of intangible assets is a grouping of assets of a similar nature and use in an entity's operations. Notwithstanding paragraph 16.10, an entity shall apply the cost model to an intangible asset within a class of intangible assets measured under the revaluation model when the asset's fair value cannot be measured by reference to an active market for the asset.
- 16.12 An entity that changes its accounting policy from the cost model to the revaluation model for a class of intangible assets shall not subsequently revert to the cost model for those assets unless an active market for those assets no longer exists.

Cost model

An entity shall measure an intangible asset after initial recording at cost less any accumulated amortisation and any accumulated impairment losses recorded in accordance with Section 23).

Revaluation model

An entity shall measure an intangible asset whose fair value can be measured by reference to an active market at a revalued amount, being its fair value at the date of the revaluation less any subsequent accumulated amortisation. Revaluations shall be made with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value as at the reporting date. Section 11 provides guidance on determining fair value.

16.15 If an intangible asset in a class of revalued intangible assets is measured using the cost model because there is no active market for the asset, the carrying amount of that intangible asset when it ceases being traded in an active market shall be regarded as the asset's cost for the purposes of applying the cost model. Applying the cost model to an intangible asset in these circumstances is not a change in accounting policy.

Recording revaluation increases and decreases

16.16 If the carrying amount of a class of intangible assets is increased or decreased as a result of a revaluation, the revaluation increase or decrease shall be recorded in the same manner as revaluation increases and decreases for classes of property, plant and equipment, as specified in paragraphs 15.15 and 15.16.

Amortisation

An entity shall allocate the depreciable amount of an intangible asset on a systematic basis over its useful life. The amortisation charge for each period shall be recorded in profit or loss, unless the entity elects, in accordance with Section 12 or Section 15, to include an appropriate portion of that charge in the cost of assets. Amortisation of an asset begins when it is available for use, ie when it is in the location and condition necessary for it to be usable in the manner intended by management.

Amortisation amount and amortisation period

- All intangible assets shall be accounted for as if they have a finite useful life. The useful life of an intangible asset that arises from contractual or other legal rights shall not exceed the period of the contractual or other legal rights, but may be shorter, depending on the period over which the entity expects to use the asset. If the contractual or other legal rights are conveyed for a limited term that can be renewed, the useful life of the intangible asset shall include the renewal period(s) only if there is evidence to support renewal by the entity without significant cost. If the useful life of an intangible asset is indefinite, it shall be determined based on management's best estimate but shall not exceed ten years.
- 16.19 An entity shall assume that the residual value of an intangible asset is zero unless:
 - (a) there is a commitment by a third party to purchase the asset at the end of its useful life; or
 - (b) there is an active market for the asset and:
 - (i) residual value can be determined by reference to that market; and
 - (ii) it is probable that such a market will exist at the end of the asset's useful life.
- 16.20 If an intangible asset's capacity to provide services has been affected adversely as a result of either:
 - (a) the entity having changed its strategy; or
 - (b) being affected by a reduction in external demand for its services,

this might indicate that the residual value, useful life, or pattern of consumption of the future economic benefits embodied in the intangible asset has changed since the most recent annual reporting date. If such indicators are present, the entity shall review its previous estimates and, if current expectations differ, amend the useful life, amortisation method or residual value. The entity shall account for the change in useful life, amortisation method or residual value as a change in accounting estimate in accordance with Section 9.

Amortisation of an asset ceases when the asset ceases to be recorded. Amortisation does not cease when the asset becomes idle or is retired from active use unless the asset is fully amortised.

Amortisation method

An entity shall select an amortisation method that reflects the pattern in which it expects to consume the asset's future economic benefits. If the entity cannot determine a more reliable pattern, it shall use the straight-line method.

Ceasing to record an intangible asset

- 16.23 An entity shall cease recording an intangible asset , when:
 - (a) it is sold or otherwise disposed of; or
 - (b) no future economic benefits are expected from its use or disposal.

- 16.24 For the purposes of paragraph 16.23(b), an entity needs to consider the possibility that no future economic benefits are expected from the use or disposal of an asset only when the entity has changed its strategy or been affected by a reduction in external demand for its services and in either case the asset's capacity to provide services might have been affected adversely as a result.
- An entity shall determine the gain or loss arising from ceasing to record an item of intangible asset as the difference between the net disposal proceeds, if any, and the carrying amount of the item. An entity shall record the gain or loss in profit or loss in the reporting period in which the item ceases to be recorded as an asset. The entity shall not classify such a gain as revenue.

Disclosures

- 16.26 An entity shall disclose the following for each class of intangible assets:
 - (a) the measurement basis used;
 - (b) the carrying amount as at the beginning and end of the reporting period;
 - (c) increases or decreases resulting from revaluations recorded in other comprehensive income under paragraphs 16.14 and 16.15;
 - (d) impairment losses recorded in profit or loss and the related line item(s) in the statement(s) of profit or loss and other comprehensive income; and
 - (e) amortisation.
- 16.27 An entity shall also disclose:
 - (a) the existence and carrying amounts of intangible assets to which the entity has restricted title or that are pledged as security for loans; and
 - (b) the amount of contractual commitments for the acquisition of intangible assets.
- An entity shall disclose the aggregate amount of research and development expenditure recorded as an expense during the period.
- 16.29 If intangible assets are stated at revalued amounts, an entity shall disclose the effective date of the revaluation.
- Where, in accordance with paragraph 16.4(a), an entity initially measures at cost a donated intangible asset, it shall make the disclosures specified by paragraphs 15.30–15.31 for that intangible asset.

Notes to Board members

- 1. Staff amended Section 17 to reflect the 19 August 2025 AASB meeting decision to revise the following aspects of Section 17:
 - (a) require an entity combination to be recognised from the date of gaining control of the acquired entity or operating unit. In addition, to include guidance that (1) the date of gaining control may, where unclear, be an estimated date as long as this date is unlikely to result in a material difference to the financial performance and position of the entity (see paragraphs 17.5 and 17.6); and (2) an entity should disclose the key judgements that the entity has made about the date it gains control of another entity or operating unit, where these judgements had a significant effect on the amounts recorded in the financial statements (see paragraph 17.12);
 - (b) extend the exemption from measuring assets at fair value to donated non-financial assets for which the entity paid a nominal or other significantly discounted amount and that were originally measured at cost (paragraph 17.7 of ED 335). For the purposes of entity combination accounting, the carrying amounts of the donated assets should be determined as though the Tier 3 Standard had always applied to the assets (for example, the cost of a donated building would be subject to depreciation from the time when it is available for use) (see paragraph 17.7(b));
 - (c) specify that an internally generated intangible asset acquired in an entity combination is not recognised (see paragraph 17.7(c));
 - (d) for the purposes of recognition on the combination date, clarify that an entity is not required to determine the fair value of all assets and liabilities in order to determine whether particular assets or liabilities are material to the entity (see paragraph 17.6). As proposed in the related Agenda Paper 4.3, staff have effected this decision by replacing the reference to 'material assets and liabilities' with 'major assets and liabilities':
 - (e) clarify that the exemption from measuring assets at fair value applies to any acquired unrecognised donated non-financial assets for which the acquiree had not paid any consideration in exchange (see paragraph 17.7(a)); and

- (f) clarify that it is the acquiree's accounting policies that are adjusted before the carrying amounts of the acquiree's assets, liabilities and items of equity are combined with those of the acquirer (see paragraph 17.8).
- 2. In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the readability of the Section and clarity of the requirements, and to make technical and internal consistency improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 17 are:
 - (a) replace references to the 'combining entities', 'reporting entity' and 'entities subject to the combination' with 'entity', 'acquirer', 'acquiree' or other expression as appropriate. This change is suggested to make it clear that the entity preparing the financial statements is the acquirer, consistent with the notion of 'gaining control', and that changes to accounting policies and the remeasurement of assets and liabilities are made in regard to the acquiree's financial statements. The changes are also suggested to ensure that the requirements address a combination involving the acquisition of an operating unit rather than a separate entity; and
 - (b) clarify the scoping of this section and its relationship to Section 8, Section 10 and Section 13.

Section 17: Entity Combinations

Scope of this section

- 17.1 This section provides the requirements for the recording, initial measurement and disclosure of combinations of the entity (the 'acquirer') with other entities or operating units (the 'acquiree') for which either:
 - (a) consolidated financial statements are prepared for the post-combination consolidated entity in accordance with paragraphs 8.2; or
 - (b) only one entity exists after the combination and, consequently, the only items (assets, liabilities and items of equity) transferred to the acquirer are its direct interests and direct obligations.

An entity combination combines separate entities or operating units into a larger reporting entity.

- 17.2 This section does not apply to combinations between an acquirer and another entity when, in accordance with paragraph 8.3, the entity has elected to collectively classify its subsidiaries, investments in associates and interests in joint arrangements involving a separate vehicle as investments in notable relationship entities. Those requirements do not require the presentation of consolidated financial statements.
- 17.3 An entity shall determine whether a transaction or another event is an entity combination by applying paragraphs 17.1 and 17.4, which require that the assets received and liabilities assumed constitute an entity or another operating unit. If an entity receives assets and the transaction or other event does not involve an entity combination, the entity shall account for the transaction or other event as an acquisition of one or more assets and, where applicable, the assumption of one or more liabilities.
- An operating unit is an integrated set of activities and related assets capable of being conducted and managed for the purpose of achieving an entity's objectives, by producing goods or services and/or generating income. It consists of assets capable of producing goods or services or generating income and operating processes applied to those assets to pursue that objective.

Recording and measurement principles

- 17.5 Subject to paragraphs 17.6—17.8, on the date an entity (the acquirer) gains control of another entity or operating unit (the acquiree), the carrying amounts of the assets, liabilities and items of equity of the acquiree on that date become the carrying amounts of the assets, liabilities and items of equity of the larger reporting entity. Where the date of gaining control is not observable, the entity shall use an estimated date. The estimated date selected shall not be one that causes the financial position of the entity to vary significantly when considered against the suite of other possible dates.
- 17.6 In applying paragraph 17.5, if a major asset or liability of the acquiree subject to the combination had not been recorded in accordance with Australian Accounting Standards, it shall initially be measured at its fair value as at the combination date.
- 17.7 The requirement in paragraph 17.6 does not apply to:
 - (a) non-financial assets that the acquiree had obtained in exchange for nil consideration;

- (b) non-financial assets that the acquiree had obtained in exchange for nominal consideration, or another significantly discounted amount, and that are measured at cost or using a cost model before the combination date. On the combination date, the acquirer shall determine the carrying amounts of these assets as though this Standard had always been applied; and
- (c) internally generated intangible assets of the acquiree.
- 17.8 If the combining entities applied different accounting policies to record or measure assets or liabilities in their financial statements immediately before the entity combination, the balances of the acquiree's assets or liabilities shall be adjusted as at the date of the combination to achieve uniformity of accounting policies across the combining entities.
- 17.9 Any difference between the carrying amount of the consideration paid by the acquirer in an entity combination and the carrying amount of the net assets acquired in the combination is recorded directly in equity. An entity combination does not give rise to the recording of goodwill.
- 17.10 Transaction costs incurred as a result of the entity combination shall be recorded as an expense when incurred.
- 17.11 After the initial recording of an entity combination, the entity shall measure and account for the combined assets, liabilities and items of equity in accordance with the sections of this Standard applicable to those items, consistently with the reporting entity's accounting policies.

Disclosure

- 17.12 An entity shall disclose for each entity combination occurring during the reporting period:
 - (a) the names of the combining entities or operating units and a description of their operations; and
 - (b) the total amounts recorded on the combination date for each class of the acquired assets and liabilities.

When required by paragraph 7.8, an entity shall also disclose the key judgements the management has made about the date the entity gained control of another entity or operating unit.

- 17.13 If an entity is a party to a major entity combination after the end of the reporting period but before the financial statements are authorised for issue by the entity's management, it shall disclose:
 - (a) the names of the acquired entities and a description of their operations; and
 - (b) the combination date.

Notes to Board members

Staff have made an amendment to reflect the 3 July 2025 AASB meeting decision to revise the following aspect of Section 18:

 Paragraph 18.2 was amended by removing the requirements for the lessee to separate the cost of services from lease payments.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the readability of the Section and clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 18 are:

- Paragraph 18.8(c) was amended to replace its reference to 'contingent rent' with 'variable lease payments' to align with AASB 1060 paragraphs 144(c), 147(f) and 148(c).
- Paragraphs 18.9 and 18.10 of ED 335 were deleted as staff consider it simpler to incorporate an additional subparagraph (d) in paragraph 18.8 and to reflect that the Board decided at the July 2025 Board meeting not to include any detailed guidance on leases with rent increases tied to inflation or similar indices.
- Paragraph 18.12 of ED 335 was merged with paragraph 18.9 of this draft Standard. Staff also deleted the first sentence of paragraph 18.12 of ED 335 to improve readability. Instead, for each lease arrangement that has significantly below-market terms and conditions principally to enable the lessee to further its not-for-profit objectives, paragraph 18.9 of this draft Standard indicates disclosures are required for each material lease by simply adding 'for each such material lease'.

Section 18: Leases

Scope of this section

This section applies to leases, except that the measurement of leased land and buildings that are investment property is specified by Section 14. All other requirements, including disclosures, in this section apply to the lessees and lessors of such leased property.

Financial statements of lessees

Recording and measurement

- A lessee shall record lease payments (including costs for services such as insurance and maintenance) as an expense over the lease term on a straight-line basis, unless another systematic basis is more representative of the time pattern of the lessee's benefit from the leased asset (in which case that other systematic basis shall be used), even if the payments are not on that basis.
- The lease payments recorded as an expense over the lease term shall include any initial direct costs of the lessee incurred in negotiating and arranging a lease and the benefit of any lease incentive receivable (eg a rental holiday period), such that those costs and incentives are recorded over the term of the lease on the same basis as other lease payments.

Financial statements of lessors

Recording and measurement

- 18.4 A lessor shall present leased assets in its statement of financial position together with other assets of a similar nature and apply the recording and measurement requirements of the section of this Standard relevant to that asset.
- 18.5 A lessor shall record lease income (excluding costs for services such as insurance and maintenance) in profit or loss over the lease term on a straight-line basis, unless another systematic basis is more representative of the time pattern of the lessee's benefit from the leased asset (in which case that other systematic basis shall be used).
- 18.6 A lessor shall record as an expense costs, including depreciation, incurred in earning the lease income.
- A lessor shall add to the carrying amount of the leased asset any initial direct costs it incurs in negotiating and arranging a lease and shall record such costs as an expense over the lease term on the same basis as the lease

income. The time pattern of income and expense recording does not depend on the time pattern of lease payments.

Disclosures for lessees and lessors

- 18.8 A lessee or lessor shall disclose the following for leases:
 - (a) a description of the underlying leased assets;
 - (b) the future minimum lease payments under non-cancellable leases for each of the following periods:
 - (i) not later than one year;
 - (ii) later than one year and not later than five years; and
 - (iii) later than five years; and
 - (c) a general description of the entity's significant leasing arrangements, including, for example, information about variable lease payments, renewal or purchase options and escalation clauses, subleases (if a lessee) and restrictions imposed by lease arrangements.
 - (d) total lease expense and total lease income for the period.
- 18.9 An entity may be a lessee in a lease arrangement that has significantly below-market terms and conditions (eg the rental payment is for a nil or nominal amount) principally to enable the lessee to further its not-for-profit objectives. The entity shall disclose, for each such material lease, information that helps users of financial statements to assess:
 - (a) the lessee's dependence on the donated asset; and
 - (b) the nature and terms of the lease, including:
 - (i) the lease payments;
 - (ii) the lease term; and
 - (iii) any amounts owing to the lessor (donor) at the reporting date.

The entity shall consider the level of detail necessary to enable those assessments by users of financial statements. The disclosures shall be aggregated or disaggregated so that useful information is not obscured by either the inclusion of a large amount of insignificant detail or the aggregation of items with substantially different characteristics.

18.10 A lessor shall disclose the information specified by Section 14, Section 15, Section 16 and Section 23 for assets provided under leases, as relevant.

Question 10 to Board members

On re-examination of the requirements in ED 335, staff note that paragraphs 19.12 – 19.13 and 19.15 thereof, relating to the disclosure requirements of contingent liabilities and contingent assets respectively, were drafted based on the New Zealand Standard Tier 3 Standard. The New Zealand Standard does not include a similar Tier 2 requirement allowing entities not to make the disclosures if impracticable to do so (per AASB 1060.154 and AASB 1060.155). At the time of drafting, staff did not include an impracticability exemption from making the disclosures about contingent liabilities and contingent assets, as the Board, at an earlier stage of developing the Tier 3 requirement, considered that requiring an entity to determine impracticability may increase judgement. However, the Board decided to include impracticability considerations in various areas (e.g. Section 9, when applying the retrospective approach to changes in accounting policies and corrections of errors; or Section 13 in applying the equity method, where the investor shall use the financial statements of the investor shall use the financial statements of the investor, unless doing so is impracticable). Staff consider that excluding an impracticability exemption would make the Tier 3 requirements more onerous than Tier 2 requirements.

Therefore, staff recommend to include a requirement that, if it is impracticable to make one or more of the disclosures in paragraphs 19.15(a) – 19.15(c), that fact shall be stated, as reflected in the last sentence of draft paragraph 19.15. Similarly, an impracticability exemption (and related disclosure) for disclosures of contingent assets was added to paragraph 19.17. These changes are to replicate the impracticability exemption (and related disclosure) for disclosures of contingent liabilities and contingent assets in AASB 1060 paragraphs 154 – 155. This adheres to the Tier 3 development principle that Tier 3 disclosure requirements should not be more onerous than Tier 2 disclosure requirements, except where necessary to compensate for simplified recognition and measurement requirements.

Do Board members agree with the staff recommendation to provide an impracticability exemption from making the disclosures about contingent liabilities and contingent assets in paragraphs 19.15 and 19.17, respectively, including disclosing that fact as reflected in the tracked changes?

If not, what do Board members suggest?

Question 11 to Board members

On re-examination of the requirements in ED 335, staff note that the disclosure requirements in paragraphs 19.13 and 19.17 of ED 335 about guarantees and firm commitments were drafted based on paragraphs A237 and A240 of the New Zealand Tier 3 Standard, respectively. However, on reflection, staff consider requiring disclosures about guarantees will make the Tier 3 requirements more onerous than Tier 2 requirements, as the same disclosures are not required in AASB 1060. Additionally, staff consider that requiring disclosure about guarantees may not align with the requirements in Section 10, which directs entities to apply AASB 9 to financial guarantee contracts. Regarding the guidance on firm commitments disclosures being specified in other topic sections, staff think it would be useful to retain the guidance in paragraph 19.16 of ED 335 but relocate it within the Possible Future Liabilities subsection (as paragraph 19.9) to provide guidance on the nature of firm commitments and signal that disclosures about commitments are required by other sections of this Standard. Staff think that should provide sufficient guidance to Tier 3 preparers without needing to specify the types of commitment disclosures in paragraph 19.17 of ED 335.

Therefore, staff recommend not to require the disclosure of guarantees in paragraph 19.13 of ED 335 and the examples of requirements to disclose information about type of firm commitments in paragraph 19.17 of ED 335, as reflected by the marked-up deletion of those paragraphs. Staff also recommend relocating paragraph 19.16 of ED 335 to within the Possible Future Liabilities subsection as paragraph 19.9.

Do Board members agree with this staff recommendation?

If not, what do Board members suggest?

Notes to Board members

Staff have made an amendment to reflect the 3 July 2025 AASB meeting decision to revise the following aspect of Section 19:

• Paragraph 19.10 was amended to clarify that provisions are measured at the entity's best estimate of the undiscounted amount to be paid.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the readability of the Section and clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 19 are:

- Paragraph 19.1 was included to clarify the scope of the section.
- Paragraph 19.2 was included to provide clarity that 'provisions' used in the context of other items are not covered by this section. This para. is based on paragraph 21.3 of the IFRS for SMES Standard (equivalent to para. 7 of AASB 137).
- Paragraph 19.4(b) was amended to remove "more likely than not" and move the definition of 'probable' into the glossary, as that term is used earlier in another section without definition.
- Paragraph 19.14 replaces the examples removed from the stem of paragraph 19.13.
- Paragraphs 19.15(a) and 19.17 were amended to remove 'best' from before 'estimate' to align with AASB 1060 paragraphs 154(a) and 155, consistent with the Board's decision at the July 2025 Board meeting to avoid using different terminology if the Tier 3 requirements are the same as Tier 2 requirements.

Section 19: Provisions and Contingencies

Scope of this section

- This section applies to provisions, contingent liabilities and contingent assets, except for those addressed by paragraph 1.3 or another section of this Standard. These include:
 - (a) financial instruments (including financial guarantee contracts (see Section 10);
 - (b) leases (see Section 18);
 - (c) employee benefit obligations (see Section 24); and
 - (d) income tax (see Section 25).

19.2 The word 'provisions' is sometimes used in the context of such items as depreciation and impairment of assets (eg uncollectable receivables). Those are adjustments of the carrying amounts of assets, instead of the recording of liabilities, and therefore are not covered by this section.

Provisions

19.3 A provision is a liability of uncertain timing or amount. For example, an entity's lease of office premises may contain conditions that require the premises to be renovated at the end of the lease, so a provision for this is recorded.

Recording provisions

- 19.4 A provision shall be recorded as a liability when:
 - (a) the entity has a present obligation (legal or constructive) as a result of a past event;
 - (b) it is probable that the entity will need to transfer assets to another party in settling the obligation;
 - (c) the entity can make a reliable estimate of the amount of the obligation.
- Only obligations arising from past events and that the entity has no realistic alternative to avoid settling are present obligations. Present obligations exist independently of the entity's future actions (ie they must be settled in one manner or another, regardless of choices the entity makes about how it operates in the future).
- 19.6 A constructive obligation is an obligation that derives from an entity's actions, where:
 - (a) by an established pattern of past practice, published policies or a sufficiently specific current statement, the entity has indicated to other parties that it will accept certain responsibilities; and
 - (b) as a result, the entity has created a valid expectation on the part of those other parties that it will discharge those responsibilities.

An example of a constructive obligation is a non-legally binding obligation to remediate an operating site to its original condition. For example, an entity would have a constructive obligation to restore a disturbed operating site if the entity has made a public announcement that, consistent with its past practice, it will remediate that site, and other parties expect the entity to act in a manner consistent with its public announcement.

19.7 The use of estimates is an essential part of the preparation of financial statements and does not undermine their reliability. This is especially true in the case of provisions, which by their nature are more uncertain than most other liabilities. Except in extremely rare cases, an entity should be able to make a reliable estimate of the amount of the obligation and therefore record a provision. Where a reliable estimate of the amount of a provision cannot be made, the liability is not recorded, and instead is disclosed as a contingent liability (see paragraphs 19.13 – 19.15).

Possible future liabilities

- 19.8 The only liabilities recorded in an entity's statement of financial position are obligations existing at the end of the reporting period as a result of a past event. Therefore, a provision shall not be recorded for liabilities that might result from a future event, because these liabilities do not yet exist. For example, costs likely to be incurred in the future to continue an entity's activities in the future are not liabilities. Similarly, provisions shall not be recorded for expected future operating losses.
- 19.9 Firm commitments are binding agreements for the exchange of a specified quantity of assets at a specified price on a specified future date or dates. They are not recorded as liabilities because the counterparty has yet to perform its promises under the binding agreement or satisfy other eligibility criteria, which is necessary for a present obligation of the entity to arise. Information about an entity's firm commitments to purchase goods, services or other assets is useful for users. An entity shall disclose the information about commitments specified in other sections of this Standard.

Measurement of provisions

19.10 Provisions shall be measured at the entity's best estimate of the undiscounted amount to be paid, taking into account current information about conditions existing at the end of the reporting period. For example, where an entity expects to settle an obligation to clean up a site where it held a fundraising event, by engaging a contractor to perform this work, the entity would take current contractor rates, and the estimated effort to

complete the work based on the site conditions at the reporting date, into account in estimating the amount required to settle the obligation.

Reimbursements

19.11 When some or all of the amount required to settle a provision might be reimbursed by another party (for example, through an insurance claim), the entity shall record any right to reimbursement as an asset, separately from the provision, only when it is virtually certain that the entity will receive the reimbursement if it settles the provision. The amount recorded for the reimbursement shall not exceed the amount recorded for the provision. In the statement(s) of profit or loss and other comprehensive income, the entity may offset any reimbursement income against the expense relating to the provision.

Disclosure of provisions

- 19.12 For each class of provision, an entity shall disclose:
 - (a) a brief description of the nature of the obligations;
 - (b) the expected amount at which the provision is recorded, separated into current and non-current portions;
 - (c) an indication of the uncertainties about the amount of the future payments required to settle the obligations;
 - (d) if significant uncertainty exists about the classification of the provision into its current and noncurrent portions, the existence of that uncertainty and reason(s) why; and
 - (e) the amount of any expected reimbursement, stating the amount of any asset recorded for that expected reimbursement.

Comparative information for prior periods is not required.

Contingent liabilities

- 19.13 A contingent liability is:
 - (a) a possible obligation, the existence of which will be confirmed only by the occurrence or non-occurrence of an uncertain future event not wholly within the entity's control; or
 - (b) a present obligation that arises from past events but is not recorded because:
 - (i) it is not probable that a transfer of assets will be required to settle the obligation; or
 - (ii) the amount of the obligation cannot be measured reliably.
- 19.14 Examples of a contingent liability are, in relation to court cases in progress, a possible obligation where the entity disputes an unproven claim against it, or a present obligation where the entity does not dispute a claim against it but the amount of the compensation to be determined by the court cannot be measured reliably. Contingent liabilities shall not be recorded in the statement of financial position, but information about them shall be disclosed in the notes (see paragraph 19.15).

Disclosure of contingent liabilities

- 19.15 Unless the possibility of any outflow of resources in settlement is remote, an entity shall disclose, for each class of contingent liability, a brief description of the nature of the contingent liability and, when practicable:
 - (a) an estimate of the amount of the contingent liability;
 - (b) an indication of the uncertainties about the amount or timing of any outflow of assets (where this is known by the entity); and
 - (c) the possibility of any reimbursement.

If it is impracticable to make one or more of the disclosures in paragraphs (a) – (c), that fact shall be stated.

Contingent assets

19.16 A contingent asset is a possible asset (eg a claim that is being disputed by the other party) that arises from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the entity's control. Contingent assets shall not be recorded in the

statement of financial position, but information about them shall be disclosed in the notes (see paragraph 19.17). However, when it is virtually certain that economic benefits will flow to the entity (eg when an amount becomes receivable as a result of a favourable judgement), then the related asset is not a contingent asset and should be recorded as an asset in the statement of financial position.

Disclosures

- 19.17 If an inflow of economic benefits from a contingent asset is probable at the end of the reporting period, an entity shall disclose in the notes a brief description of the nature of the contingent asset and, when practicable,
 - (a) an estimate of the amount of the contingent asset (where this can be estimated). If it is impracticable to disclose an estimate of the amount of the contingent asset, that fact shall be stated.

Prejudicial disclosures

19.18 In extremely rare cases, disclosures of some or all of the information required by paragraphs 19.12 19.15 and 19.17 can be expected to prejudice seriously the position of the entity in a dispute with other parties on the subject matter of the provision, contingent liability or contingent asset. In such cases, an entity need not disclose the information, but shall disclose the general nature of the dispute, together with the fact that, and reason why, the information has not been disclosed.

Section 20: Revenue

[To be updated]

Scope of this section

- 20.1 Revenue is income arising in the course of an entity's ordinary activities. Revenue includes:
 - (a) recorded inflows of cash and other assets to the entity, other than:
 - (i) inflows from borrowings, sales of assets, or contributions of capital from owners; and
 - (ii) inflows that give rise to liabilities to act or perform in a particular way in the future, such as liabilities to transfer goods or render services;
 - (b) recorded reductions in liabilities to act or perform in a particular way in the future (see paragraphs 20.7 and 20.11); and
 - (c) recorded increases in debtors (accounts receivable) resulting from transfers of goods, or the rendering of services, by the entity.
- Examples of revenue are donations, grants, members' fees, funding or sales consideration earned through the provision of goods or services to beneficiaries or customers (including fundraising events).

Accounting for revenue

- 20.3 On initial recording of cash or another asset provided to the entity (ie without the entity purchasing it from a supplier):
 - (a) the entity shall record a deferred revenue obligation (liability) if the entity and that provider have a common understanding that, in response, the entity will perform in a particular manner resulting in the related expenditure, transfer or using up of:
 - (i) that asset; or:
 - (ii) other assets of the entity with a similar value in accordance with that common understanding (see paragraph 20.9); or
 - (b) if a deferred revenue obligation liability described in (a) does not exist, record revenue simultaneously with initially recording the asset. This occurs at the earlier of receiving the asset and obtaining control of a right to receive the asset.
- The liability in paragraph 20.3(a) and the revenue in paragraph 20.3(b) shall be measured at the same amount as the amount recorded initially for the asset. That amount shall be measured in accordance with:
 - (a) the measurement requirements in paragraph 20.5, for debtors; and
 - (b) the applicable section of this Standard, for all other assets.

Measurement of debtors

Amounts receivable in exchange for goods or services transferred to customers (debtors) shall be measured initially at fair value, estimated as the amount of consideration to which the entity expects to be entitled. That amount excludes amounts collectible on behalf of third parties (eg goods and services tax). The subsequent measurement requirements for debtors, including assessing their recorded amounts for impairment, are set out in Section 10: Financial Instruments.

Deferred revenue obligations

- For the purposes of paragraph 20.3(a), for a deferred revenue obligation to arise from a common understanding that the entity will perform in a particular manner, it is unnecessary for the obligation to be enforceable against the entity by legal or other means.
- 20.7 Examples of an entity's performance in a particular manner resulting in the expenditure, transfer or using up of either the asset received, or other assets, referred to in paragraph 20.3(a), are:
 - transferring specified goods or rendering specified services, either to the asset provider in return or to third party beneficiaries;
 - (b) performing a specified activity (including acquiring or constructing a specific asset eg constructing a building under the terms of a capital grant);
 - (c) incurring eligible expenditure for a specified purpose (eg acquiring a specified asset); and
 - (d) using the asset(s) for a specified period, either for specific programmes or activities, or for the entity's programmes and activities generally.
- 20.8 Judgement is required to determine when an entity satisfies its deferred revenue obligations that arose from receiving transferred assets and revenue is no longer deferred. Revenue shall be recorded in the manner that most faithfully represents the amount and pattern of the entity's using up of the assets received (or other assets with a similar value). Examples of the events and time patterns for identifying the satisfaction of deferred revenue obligations are:
 - (a) when goods and services are transferred (identified by reference to the proportion of the total quantity, cost or value of the goods or services expected to be provided, or on a time basis);
 - (b) when activities are performed;
 - (c) when eligible expenditure is incurred; and
 - (d) as time elapses over the specified period, reflected in a systematic allocation basis over that period.

Evidence of a common understanding

- 20.9 For the purposes of paragraph 20.3(a), evidence of a common understanding that the entity will expend, transfer or use up an asset it received, or other assets of similar value in accordance with that common understanding includes written communication, between the entity and the provider of the asset, or other written/oral representations made to customers, regarding:
 - (a) the purpose for which the asset, or other assets of the entity, is to be expended, transferred or used up; or
 - (b) the period over which the transferred asset is to be used.

If a deferred revenue obligation is enforceable, evidence of the aspects in (a) or (b) would normally exist. However, enforceability of a deferred revenue obligation is not required to satisfy the evidence requirement of this paragraph.

- 20.10 For the purposes of paragraph 20.9:
 - (a) in sales of goods or services, the asset provided to the entity is the sales consideration, and the communication between the customer and the entity can be in writing or email, or other representations (such as advertising) made to the customer regarding the goods or services that will be provided in return for the sales consideration;
 - (b) where an application for funding sets out how or when the entity expects to use the funds, approval of the application by the funding provider is sufficient to demonstrate that there is common understanding between both parties concerning the expected use of the funds; and

(c) an example of communication is a specific current statement of the entity regarding how it would use assets provided to it, which creates a valid expectation of asset providers that it would discharge its responsibilities to use the assets in the promised manner.

Satisfying deferred revenue obligations

- When paragraph 20.3(a) applies on initial recording of an asset, the entity shall subsequently reduce the liability, and simultaneously record revenue for the same amount, as the deferred revenue obligation is satisfied by the entity (either on the occurrence of a commonly understood event, such as a transfer of a specified good or making a specified expenditure, or progressively over a period, such as where specified services are rendered by the entity).
- An expectation to use assets received to support the general operating costs of the entity over an unspecified period of time is not identified as giving rise to deferred revenue. In these circumstances, revenue is recorded simultaneously with initially recording the asset.
- 20.13 Internal expectations or decisions by those charged with governance about how or when the entity expects to use funds received from donations, grants and bequests are not relevant when determining whether a deferred revenue obligation of the entity exists.

Principal versus agent considerations

- When another party is involved in satisfying the requirements of an obligation of the entity to a beneficiary or customer, the entity shall determine whether the nature of its obligation is to satisfy the requirements itself (that is, the entity is a principal) or to arrange for those requirements to be met by the other party (that is, the entity is an agent).
- 20.15 An entity is a principal if it controls the specified good or service before that good or service is transferred to the beneficiary or customer. Indicators that an entity controls the specified good or service before it is transferred to the beneficiary or customer include, but are not limited to, the following:
 - (a) the entity has the primary responsibility for providing the good or service to the beneficiary or customer, including the primary responsibility for the acceptability of the good or service (such as whether the good or service meets a customer's specifications);
 - (b) the entity has discretion in establishing the prices, either directly or indirectly, for the good or service; and
 - (c) the entity has inventory risk in relation to the specified good or service transferred to a beneficiary or customer (eg the beneficiary or customer has a right of return).
- 20.16 An example of the entity as principal is when the entity organises a conference for a group of not-for-profit entities, receives the conference fees, and is responsible for all the conference content and delivery even though the entity engages external parties to deliver various sessions under its supervision.
- 20.17 In applying paragraph 20.5:
 - (a) an entity that is a principal shall record revenue in the gross amount of consideration to which the entity expects to be entitled in exchange for providing specified goods or services to beneficiaries or customers; and
 - (b) an entity that is an agent shall record revenue in the amount of any management or administration charge, fee or commission to which the entity expects to be entitled in exchange for arranging for the specified goods or services to be provided to beneficiaries or customers. An entity's charge, fee or commission as agent might be the net amount of consideration that the entity retains after paying another party the consideration for providing specified goods or services to beneficiaries or customers.
- 20.18 Regardless of whether an entity is a principal or an agent, its debtors exclude amounts collectible on behalf of third parties (eg goods and services tax).

Pledges

20.19 A pledge is a promise made by a donor to contribute assets to the entity in the future. Pledged assets and related revenue are not recorded until the promised assets are received.

Volunteer services

- 20.20 An entity may, as an accounting policy choice, elect to record volunteer services received, or a class of volunteer services received, if the fair value of those services can be measured reliably. If an entity elects to record volunteer services received, it shall measure those services at their fair value.
- 20.21 The entries for voluntarily recording the fair value of volunteer services shall include that amount in:
 - (a) revenue or (in rare circumstances, eg when the controlling entity donates legal services to the entity) contributions by owners; and
 - (b) expenses for the using up of those services as they are received.
- 20.22 Some volunteer services, such as professional services, might have readily observable market prices. In such circumstances, obtaining a reliable measure of their fair value would be relatively straightforward.

Unit of account for deferred revenue obligations

- 20.23 The unit of account for deferred revenue obligations is each separately documented commonly understood obligation identified. There might be multiple documented obligations attached to an inflow of assets, each of which shall be accounted for separately when reducing the deferred revenue liability balance and recording revenue. However, if one or more deferred revenue obligations arise and are fully satisfied in the same reporting period, there is no need to disaggregate the deferred revenue obligations; the entire amount of the asset(s) received is recorded as revenue in that period.
- Judgement will be required to determine an appropriate revenue recording approach for determining the point in time at which, or the period over which, the documented commonly understood obligation is satisfied. The following are examples of documented commonly understood obligations and the different revenue recording approaches that may be used, consistent with the requirements of paragraphs 20.7 and 20.8:
 - (a) Deliver specified goods or services to beneficiaries (eg to deliver 1,000 school lunches) revenue could be recorded as the specified goods or services are delivered.
 - (b) Purchase an asset (eg a vehicle) as stipulated under a funding agreement revenue could be recorded when the asset is purchased.
 - (c) Construct an asset (eg building) revenue could be recorded over the construction period (eg on a stage of completion basis).
 - (d) Support general operating costs (over a specified time period, eg three years) revenue could be recorded on a straight-line basis over the three-year period.
 - (e) Host an event or deliver a specific programme or activity revenue could be recorded on a stage of completion basis as the costs to host the event or deliver the specified programme or activity are incurred.

Disclosures

- 20.25 An entity's total revenue for the period shall be disaggregated into categories that help users of its financial statements assess the nature, amount, timing and uncertainty of each dissimilar type of revenue recorded. At a minimum, the amounts recorded for the following categories shall be disclosed separately if they were received by the entity:
 - (a) donations, bequests and other revenue from general fundraising activities, apart from those disclosed separately under (c) below;
 - (b) grants stipulated to be used for the provision of goods or services consistent with the entity's mission, without specification of which goods or services are to be provided;
 - (c) grants and donations specified to be used for the construction or purchase of assets;
 - (d) revenue from providing specified goods or services sold to customers (including governments as purchasers of those goods or services);
 - (e) membership fees and subscriptions;
 - interest, dividends and other investment revenue, disaggregated where required by para. 10.30(a);
 and
 - (g) other revenue.

- In relation to any amounts of revenue disclosed under (d), a general description of the nature of the goods and services provided to customers shall also be disclosed.
- 20.26 The categories may be described using terminology appropriate for the entity and need not use the titles used in paragraph 20.25, provided that the separate categories are still disclosed.
- 20.27 If there is difficulty in determining the category that should be used for a particular transaction, the entity shall use judgement to determine an appropriate classification. This classification shall then be used consistently in future periods so that the information reported is comparable over time.

Volunteer services

- 20.28 In relation to any volunteer services (such as free professional services) provided to the entity during the reporting period, the entity shall disclose:
 - (a) a description of those services;
 - (b) any amount recorded as revenue under the option to do so in paragraph 20.21(a); and
 - (c) any other information necessary to satisfy the disclosure objective for revenue in paragraph 20.25.
- 20.29 The entity shall disclose sufficient descriptive information about volunteer services to enable users of its financial statements to understand the effects of volunteer services on the entity's operations, including the entity's dependence on volunteer services for the achievement of its objectives and any known information about impending significant changes to the nature and amount of volunteer services. The entity shall consider the level of detail necessary to satisfy this disclosure objective, and shall aggregate or disaggregate disclosures so that useful information is not obscured by either the inclusion of a large amount of insignificant detail or the aggregation of items with substantially different characteristics. Meeting this disclosure objective does not require an entity to quantify the value of volunteer services received.

Deferred revenue obligations

- 20.30 An entity shall disclose the amount recorded as liabilities in respect of deferred revenue obligations at the reporting date, disaggregated according to:
 - (a) its current and non-current portions; and
 - (b) (b) the nature of the transfers, expenditures or using up of assets expected to occur in settling the obligations (eg transfers of inventories, expenditures to be incurred in rendering services, and expenditures to construct or purchase assets).

Section 21: Expenses

- 21.1 Expenses are decreases in assets, or increases in liabilities, that result in decreases in equity, other than those relating to distributions to holders of equity claims. Expenses shall be recorded upon the recording of a decrease in assets, or an increase in liabilities, of the nature referred to above. Recording expenses is based on accrual accounting, where not all cash payments give rise to an expense (eg purchases of assets or settlements of liabilities paid for with cash, neither of which decreases equity), and some expenses arise in the absence of a cash payment (eg liabilities incurred to pay for employee services consumed, and using up of assets recorded as depreciation). The timing of the recording of various types of expense is specified in other sections of this Standard.
- Expenses include only amounts paid and payable by the entity with resources it controls. Amounts paid on behalf of others using resources controlled by that other entity are not expenses of the entity. Paragraphs 20.15–20.16 provide guidance on whether an entity is acting as an agent of another entity.

Notes to Board members

The Board decided to finalise Section 22 as exposed in ED 335 at the 3 July 2025 Board meeting. However, on re-examination of the requirements, staff have removed this section because staff think that the accounting for borrowing costs is already addressed by Section 10 and other sections of this Standard, which already specify requirements for interest and transaction costs incurred. Staff note that this section was drafted based on Section 25 of the IFRS for SMEs Standard, which references 'other costs' as being 1) finance charges in respect of finance leases; and 2) exchange differences arising from foreign currency borrowings to the extent that they are regarded as an adjustment to interest costs. Neither of these costs is relevant in the context of the Board's decisions regarding leases and loans. Staff have not yet updated the Section numbers to reflect the deletion of Section 22, but will do so when staff bring the next version of the working draft of the Tier 3 Standard for the Board's consideration.

Question 12 to Board members

On re-examination of the requirements in ED 335, staff note that paragraph 23.5(a) provides guidance that a loss of service potential of inventory held for distribution shall be measured using the <u>more easily determined</u> of either cost or current replacement cost. When drafting the requirements, staff had regard to AASB 102 *Inventories*, particularly the Basis for Conclusions in AASB 2007-5 *Amendments to Australian Accounting Standard – Inventories Held for Distribution by Not-for-Profit Entities*, which acknowledge that the loss of service potential of inventories held for distribution can be measured in various ways for both conceptual and practical reasons (paragraphs BC5 – BC20). Staff initially considered that allowing entities to choose the more easily determinable measure – cost or current replacement cost – would simplify application and reduce the need for judgement. However, staff have reconsidered that proposal in ED 335 because cost will almost always be the most easily determinable measure, which might lead to inappropriate outcomes in some cases. Therefore, staff recommend removing the flexibility by deleting the phrase 'more easily determined' from paragraph 23.5. To support application of the revised guidance, staff have added an example in paragraph 23.6 to illustrate when measuring a loss of service potential by reference to either cost or current replacement cost may be more appropriate, depending on the nature of inventory held for distribution.

Do Board members agree with the staff recommendation to remove the flexibility in paragraph 23.5 by deleting the phrase 'more easily determined', thereby requiring entities to apply judgement to determine an appropriate measurement basis for a loss of service potential of inventory held for distribution, and add an example in paragraph 23.6 to illustrate when measuring a loss of service potential by reference to either cost or current replacement cost may be more appropriate, depending on the nature of inventory held for distribution?

If not, what do Board members suggest?

Notes to Board members

Staff have made amendments to reflect the 19 August 2025 AASB meeting decisions to revise the following aspects of Section 23:

- Paragraph 23.4 was amended to clarify that the recoverable amounts of non-financial assets (other than inventory) are measured at an individual asset level. This was edited to acknowledge that some inventories have such similar characteristics that it is practical to assess them for impairment on a grouped basis.
- Paragraph 23.6 (originally paragraph 12.6 of ED 335) is included beneath paragraph 23.5 to keep the requirements relating to identifying and measuring a loss of service potential within the impairment section. While the Board also agreed with relocating paragraph 12.7 with 12.6 into Section 23, on reflection, the guidance that an entity should consider the appropriate measurement bases for different inventories' loss of service potential is already provided in paragraph 23.6. As such, staff considered paragraph 12.7 unnecessary and omitted it (it is shown as relocated in Section 23 for audit trail purposes only).
- While the Board agreed to include inventories as a class of non-financial assets for which disclosure of information about impairment losses would be required, staff note that the requirement to disclose impairment losses recorded in profit or loss is already required in Section 12. Staff consider it easier to simply include within Section 12 the requirement to disclose the line item(s) in the statement(s) of profit or loss and other comprehensive income. Staff's suggested amendments apply also to Sections 15 and 16, as presented in the last dot point below relating to staff amendments.
- Paragraph 23.12, which proposed the option for impairment losses to be disclosed with depreciation and amortisation expenses, was deleted.

In addition, staff have made amendments to address stakeholder comments to reduce verbosity and improve the readability of the Section and clarity of the requirements, and to make technical and editorial corrections or improvements following further staff consideration of the exposure draft. The more significant of these amendments to Section 23 are:

- Paragraph 23.1 of ED 335 was deleted as the information is covered in paragraphs 23.2 and 23.3.
- Paragraph 23.1(b) was amended to include a reference to paragraph 14.8, to scope out of Section 23 investment property measured at fair value.
- Paragraph 23.6 was amended to clarify the measurement of loss of service potential, including to reduce verbosity.
- Paragraph 23.8 and its heading referencing fair value less costs to sell were amended to refer to costs of disposal. While Section 23 was drafted based on the IFRS for SMEs Standard, which uses 'costs to sell', staff have amended the term to 'costs of disposal' to align with terminology used in AASB 136 Impairment of Assets. This change responds to stakeholder feedback to use the existing terminology required in Tier 1/Tier 2 requirements if the requirements are consistent. Staff also consider 'costs to sell' is used in AASB 5, which would add confusion for Tier 3 preparers, given that entities are directed to apply AASB 5 for non-current assets held for sale.
- Paragraph 23.9 of ED 335 was deleted as non-financial assets measured using a revaluation model (fair value) are scoped out from the requirement to assess for impairment. Under the requirements for non-financial assets included in a class of assets subsequently measured using the revaluation model (fair value), if the fair value of particular assets cannot be measured reliably, the cost model would be required to be applied to them (hence the entity would be required to assess them for potential impairment), as contained in the respective sections.
- Paragraphs 23.10 and 23.11 of ED 335 were deleted as staff consider, as noted in the third dot point for changes resulting from the Board's decisions, there are already existing requirements to disclose the amount of impairment losses recorded in profit or loss for property, plant and equipment, investment property accounted for by using the cost model and intangible assets in Sections 15 and 16, respectively. Staff consider it easier to simply include within those respective sections the requirement to disclose the line item(s) in the statement(s) of profit or loss and other comprehensive income, as noted in the relevant notes to the Board for Sections 15 and 16.

Section 23: Impairment of Assets

Scope of this section

- 23.1 This section applies to the accounting for the impairment of assets except for:
 - (a) financial assets. Section 10 sets out the impairment requirements for financial assets,; and
 - (b) non-financial assets regularly revalued to fair value in accordance with paragraphs 14.8, 15.13 or 16.14.

Identifying and recording impairment losses

- At each reporting date, an entity shall assess whether a non-financial asset (eg inventories and property, plant and equipment) is impaired when, and only when:
 - (a) the asset has been damaged physically or is a perishable item that has spoilt or become obsolete; or
 - (b) the entity has changed its strategy or been affected by a reduction in external demand for its goods or services, and in either case, the asset's capacity to provide services or generate sales revenue might have been affected adversely as a result.
- 23.3 If any of the events in paragraph 23.3(a) or (b) has occurred, the entity shall identify whether the asset's carrying amount is impaired by determining whether it exceeds the asset's recoverable amount. If an excess exists, the entity shall reduce the asset's carrying amount to its recoverable amount. The reduction shall be recorded as an impairment loss in profit or loss.
- An entity shall assess inventory for impairment either individually or grouped on the basis of similar characteristics. An entity shall assess other assets for impairment at an individual asset level.

Measuring recoverable amount

Inventories

- 23.5 The recoverable amount of an item of inventory (or group of similar items of inventory) is:
 - (a) for inventories held for distribution cost less loss of service potential. The loss of service potential shall be measured by reference to the cost or current replacement cost of those inventories; and
 - (b) for all other inventories the selling price less the costs to complete and sell.
- 23.6 If one or more of the events in paragraph 23.2 occurs in respect of inventory held for distribution, an entity shall use judgment in assessing whether a loss of service potential of those inventories has occurred, and if so, the amount of that loss. In many cases, a loss of service potential of inventory would be identified from a current replacement cost (see paragraph 11.9(b)) that is lower than the original acquisition cost or other subsequent carrying amount of the inventory. In other cases, such as in cases involving obsolescence, the cost of an item might be an appropriate measure of the associated a loss of service potential. For example, the cost of damaged inventory that needs to be scrapped might be an appropriate estimate of the inventory's loss of service potential, while the loss of service potential of superficially damaged inventory might be more appropriately estimated by reference to the inventory's current replacement cost.

Other non-financial assets

23.7 The recoverable amount of an individual non-financial asset other than inventory is the higher of its fair value less costs of disposal and its value in use. There is a rebuttable presumption that an asset's fair value less costs of disposal.

Fair value less costs of disposal

23.8 Section 11 provides guidance on fair value measurement. Cost of disposal are incremental costs directly attributable to the disposal of an asset, excluding finance cost and income tax expenses.

Value in use

- Value in use is the present value of the future cash flows expected to be derived from an asset. The present value calculation involves the following steps:
 - (a) estimating the future cash inflows and outflows expected to be derived from:
 - (i) continuing use of the asset; and
 - (ii) disposal of the asset at the end of its useful life in an arm's length transaction between knowledgeable, willing parties; and
 - (b) applying a current market-based risk-adjusted discount rate to those future cash flows.
 - , An entity may use recent financial budgets or forecasts in estimating the cash flows expected from continuing use of the asset.

Section 24: Employee Benefits

[To be updated]

Scope of this section

- 24.1 Employee benefits are all forms of consideration given by an entity in exchange for services rendered by employees, including directors and management. This section does not apply to the recording, measurement and disclosure of defined benefit superannuation obligations incurred by an entity (which this Standard requires to be accounted for in accordance with AASB 119 *Employee Benefits*). Employee benefits include:
 - (a) wages and salaries (including performance-related bonuses) and social security contributions;
 - (b) compensated absences (such as annual leave, sick leave and long-service leave);
 - (c) payments for post-employment benefits (ie employee benefits other than termination benefits that are payable to the employee when they depart the entity), such as payments to defined contribution superannuation plans (under these plans, the entity's obligations are limited to a stipulated amount, eg percentage of salary); and
 - (d) non-monetary benefits (such as medical care, housing, motor vehicles and other free or subsidised goods or services) for current employees.

Recording employee benefits

- An entity shall record the cost of all employee benefits to which its employees became entitled under legislation or an enforceable agreement as a result of services rendered to the entity during the reporting period as follows:
 - (a) as a liability ('provision'), after deducting amounts of employee benefits paid either directly to the employees or to a third party on their behalf (eg as a tax instalment or a contribution to an employee benefit fund). If the amount paid exceeds the obligation arising from services received before the end of the reporting period, the entity shall record that excess as a prepayment (asset) to the extent that the prepayment will lead to a reduction in future payments or a cash refund; and
 - (b) as an expense, except to the extent that the cost is recorded as part of the cost of acquiring or constructing an asset, such as inventory or an item of property, plant and equipment, as required or permitted by another section of this Standard.

Entitlements to accumulating leave

- 24.3 Subject to paragraph 24.4, an entity records a provision for employee entitlements to future leave, or payments in lieu of leave, accumulated as at the end of the reporting period as a result of employee services received until that date. Entitlements to accumulating leave include annual leave, sick leave and long-service leave entitlements.
- In applying paragraphs 24.2 and 24.3, an entity records a provision for non-vesting leave only if, and to the extent that, the leave has been taken by an employee and has not been paid by the entity (ie an amount is due and payable to the employee) at the end of the reporting period. An entity's obligation for (ie employee's right to) leave is vesting if, at some past or future time, the employee has (or will) become entitled to a cash payment of the accumulated entitlement when they depart the entity.
- 24.5 Common examples of non-vesting leave entitlements are sick leave and personal leave; if the accumulated balance of that leave may only be taken as a paid absence during employment with the entity, it is non-vesting. Many of an entity's obligations for leave will be vesting (ie either at the end of the reporting period or at a specified future date, upon expiry of a vesting period, the employee will be entitled to a cash payment of the accumulated entitlement if they depart the entity). Examples of vesting leave entitlements are annual leave and long-service leave.
- An entity shall not record a provision for non-accumulating leave (eg overtime leave in lieu that does not carry forward beyond the end of the reporting period). The cost of non-accumulating leave is recorded when the leave is taken.

Measurement of employee benefits

- An entity shall measure the provision for employee benefits payable to its employees, and related employee benefits expense, at the undiscounted amount of employee benefits expected to be paid. The employee benefits expense for the reporting period comprises the cost of employee services received during the reporting period and remeasurement of the opening balance of the provision during the reporting period (eg due to changes in wage and salary rates affecting the amount of accrued leave entitlements).
- In estimating a provision for long-service leave, an entity shall take into account the likelihood that any long-service leave unvested at the end of the reporting period will vest in a future period. This does not require the entity to estimate the probability-weighted expected value of its long-service leave obligations (eg a 'most likely outcome' approach may be used instead).

Disclosures

24.9 An entity shall disclose the amount recorded in profit or loss as an expense for defined contribution plans.

Section 25: Income Tax

[To be updated]

25.1 If the entity pays income tax, it shall record income tax expense for the income tax payable for the period. That amount shall be based, in descending order of priority, on the entity's tax assessment for the period (if received by the date the financial statements are authorised for issue), its tax return for the period (if completed by the date the financial statements are authorised for issue) or an estimate of the amounts to be included in that tax return. The entity's recorded liability for income tax at the end of the reporting period shall be measured as the sum of the estimated income tax payable for the period and any income tax assessed in respect of a prior period (or periods) and unpaid at the end of the reporting period.25.2 The entity's income tax expense recorded for the period shall be presented as a line item in the statement of profit or loss and other comprehensive income, in accordance with paragraph 4.4(d). The entity's liability for income tax recorded as at the end of the reporting period shall be presented as a line item in the statement of financial position in accordance with paragraph 3.2(l).

Section 26: Foreign Currency Translation

[To be updated]

- All amounts shall be presented in Australian dollars. If the entity has transactions or balances that are not denominated in Australian dollars, it shall translate their amounts to Australian dollars as follows:
- (a) transactions are to be translated using the exchange rate on the date of the transaction; and monetary asset and liability balances are to be translated using the exchange rate at the end of the reporting period.

Section 27: Events Occurring after the Reporting Period

[To be updated]

- 27.1 Events occurring after the reporting period are events, favourable and unfavourable, that occur between the end of the reporting period (eg financial year) and the date when the financial statements are authorised for issue by the entity's management.
- An entity shall adjust the amounts recorded in its financial statements and update the related disclosures to reflect events that occur after the reporting period and provide evidence of conditions that existed at the end of the reporting period. The following are examples of events that require an entity to adjust the amounts recorded in its financial statements, or to record items not previously recorded:
 - (a) the settlement after the end of the reporting period of a court case confirming that the entity had a liability at the end of the reporting period because the disputed event occurred on or before that date.

- (b) the receipt of information after the end of the reporting period indicating that an asset was impaired or damaged at that date. For example:
 - (i) the bankruptcy of a debtor occurring after the end of the reporting period usually confirms that a loss already existed at that date on a receivable account, and that the entity needs to adjust the carrying amount of the receivable account; and
 - (ii) the disposal of physically damaged inventories or perishable items after the end of the reporting period might provide evidence about their estimated selling price less costs to complete and sell at that date.
- (c) the discovery of fraud or errors showing that the financial statements are incorrect.
- An entity shall not adjust the amounts recorded but instead, provide disclosures in accordance with paragraph 27.4 in its financial statements to reflect events after the end of the reporting period indicating conditions that arose after that date. The following are examples of such events:
 - (a) the entity's management decides, after the end of the reporting period, to make further grants to the community;
 - (b) purchases and disposals of assets occurring after the end of the reporting period; and
 - (c) a decision made by a lender after the end of the reporting period to forgive some amounts borrowed by the entity.

Disclosures

- Where material events occur after the end of the reporting period and indicate conditions that arose after that date (see paragraph 27.3), the entity shall disclose the following information in the notes for each material category of such events:
 - (a) the nature of the event;
 - (b) an estimate of its financial effect, or a statement that such an estimate cannot be made; and
 - (c) the effect, if any, on the entity's ability to continue operating.

The disclosures shall reflect information that becomes known after the end of the reporting period but before the financial statements are authorised for issue.

An entity is not required to disclose comparative information about events occurring after the end of the previous reporting period.

Section 28: Related Party Disclosures

[To be updated]

Scope of this section

- 28.1 This section requires an entity to include in its financial statements the disclosures necessary to draw attention to the possibility that its financial position and profit or loss have been affected by related party relationships and transactions and outstanding balances with related parties (eg without a related party relationship, transactions might not have been undertaken on terms and conditions that differed from those prevailing in arm's length transactions).
- In general terms, a person or entity related to the reporting entity ('related party') is related by virtue of a relationship of significant (or greater) influence, being a member of key management personnel or a close family member of a person qualifying as a related party. A 'related party' is defined in the Glossary; that definition applies to all assessments of when a related party of the reporting entity exists.

Disclosures

Disclosure of controlling party relationships

- 28.3 Relationships between the reporting entity and any entities identified as its subsidiaries shall be disclosed regardless of whether:
 - (a) related party transactions occurred during the period; and

- (b) consolidated financial statements were prepared for the reporting entity and its subsidiaries.
- An entity shall disclose the name of its parent and, if different, the ultimate controlling party. If neither the entity's parent nor the ultimate controlling party produces financial statements available for public use, the name of the next most senior parent that does so (if any) shall also be disclosed.
- In considering each possible related party relationship, an entity shall assess the substance of the relationship and not merely the legal form.

Disclosure of related party transactions

- A related party transaction is a transfer of resources (whether cash, goods or services) or obligations between a reporting entity and a related party, regardless of whether:
 - (a) a price is charged; or
 - (b) it occurs on terms equivalent to those prevailing in arm's length transactions.
- 28.7 Examples of common related party transactions include:
 - (a) transactions between the entity and its principal owner(s);
 - (b) transactions between the entity and another entity when both entities are under the common control of a single entity or person; and
 - (c) transactions in which an entity or person that controls the reporting entity incurs expenses directly that otherwise would have been borne by the reporting entity.
- 28.8 If an entity has related party transactions, it shall, subject to the exemption in paragraph 28.10, disclose information about:
 - (a) the nature of the related party relationship; and
 - (b) the transactions, outstanding balances and commitments;

necessary for an understanding of the potential effects of the relationship on the financial statements.

- 28.9 At a minimum, the disclosures made in accordance with paragraph 28.8(b) shall include:
 - (a) the amount of the transactions;
 - (b) the amount of outstanding balances and:
 - (i) their terms and conditions, including whether they are secured and the nature of the consideration to be provided in settlement; and
 - (ii) details of any guarantees given or received;
 - (c) provisions for uncollectable receivables related to the amount of outstanding balances; and
 - (d) the expense recorded during the period in respect of bad or doubtful debts due from related parties.
- 28.10 The disclosures in paragraphs 28.8 and 28.9 need not be made for:
 - (a) compensation paid to the entity's key management personnel. Key management personnel are those persons having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including any director (whether executive or otherwise) of that entity; and
 - (b) donations received by the entity from a related party, unless evidence indicates the donations could influence the entity's activities or use of resources. An example of such evidence is when a donation is received on the condition that the entity must consequently purchase goods or services from a specified supplier.
- An entity shall make disclosures required by paragraphs 28.8 and 28.9 in respect of notable relationship entities separately for each of the following three categories:
 - (a) entities with control, joint control or significant influence over the entity;
 - (b) entities over which the entity has control, joint control or significant influence; and
 - (c) any other related parties having a notable relationship (as defined in paragraph 8.1) with the reporting entity not categorised under (a) or (b).

If an entity has made some or all of these disclosures about notable relationship entities for the same reporting period in accordance with paragraph 8.6, there is no need to repeat them in complying with this paragraph.

28.12 The following are examples of transactions that shall, subject to the exemption in paragraph 28.10, be disclosed if they are with a related party:

- (a) purchases, sales or transfers of:
 - (i) goods (finished or unfinished); and
 - (ii) property and other assets;
- (b) rendering or receiving services;
- (c) lease payments;
- (d) transfers under finance arrangements (including loans and equity contributions in cash or kind);
- (e) provision of guarantees or collateral;
- (f) commitments to do something if a particular event occurs or does not occur in the future; and
- (g) settlement of liabilities on behalf of the entity or by the entity on behalf of another party.
- An entity shall not state that related party transactions were made on terms equivalent to those that prevail in arm's length transactions unless such terms can be substantiated.

Section 29: Transition to Tier 3 General Purpose Financial Statements

[To be updated]

Scope and application of this section

- 29.1 Subject to the option in paragraph 29.3, a first-time adopter of this Standard shall apply this section, regardless of its previous accounting framework (eg another tier of Australian Accounting Standards or special purpose financial statements) and whether it has previously applied this Standard, in its first Tier 3 financial statements. These financial statements shall both:
 - (a) conform with the requirements of this Standard in all respects; and
 - (b) contain an explicit and unreserved statement that they comply fully with this Standard.
- 29.2 Circumstances in which an entity prepares its first Tier 3 financial statements in accordance with this Standard include when the entity:
 - (a) did not present general purpose financial statements for previous periods;
 - (b) presented its most recent previous financial statements in conformity with Tier 1: Australian Accounting Standards or Tier 2: Australian Accounting Standards Simplified Disclosures; or
 - (c) presented its most recent previous financial statements as special purpose financial statements.
- 29.3 When applying Tier 3 reporting requirements for the first time, an entity shall select and apply either:
 - (a) subject to paragraph 29.4, the transition requirements set out in this section; or
 - (b) all relevant requirements of this Standard on a modified retrospective basis in accordance with Section 9: *Accounting Policies, Estimates and Errors* (ie record the cumulative effect of the new accounting policy as at the beginning of the reporting period of first-time adoption as if it had always been applied, without restating information presented for comparative periods) and apply the disclosure requirements in:
 - (i) paragraphs 29.13–29.18 (including the election to use the disclosure exemption in paragraph 29.18); and
 - (ii) paragraph 29.23.
- In relation to some or all assets or liabilities existing on the transition date, first-time adopters of this Standard transitioning under this section from application of Tier 1 or Tier 2 requirements of Australian Accounting Standards (as referred to in AASB 1053 *Application of Tiers of Australian Accounting Standards*) may elect to continue applying all related Tier 1 or Tier 2 recording, measurement and disclosure requirements to those assets or liabilities.

First-time adoption

29.5 Notwithstanding paragraph 2.12, an entity need not disclose comparative information in its first Tier 3 financial statements if it did not disclose comparable information in its most recent previous financial statements.

- 29.6 Depending on the election made by the entity under paragraph 29.3, an entity's date of transition to this Standard is:
 - (a) if the entity elects to apply this section, the beginning of the earliest period for which the entity presents full comparative information in accordance with this Standard in its first financial statements that conform to this Standard; or
 - (b) if the entity elects to apply Section 9, the beginning of the current period in which this Standard is first applied (with the cumulative effect of changed accounting policies on the carrying amounts of assets and liabilities as at that date recorded as at the date of transition).

Procedures for preparing financial statements at the date of transition

- 29.7 Except as provided in paragraphs 29.10 and 29.11, an entity shall on its date of transition to this Standard (ie the beginning of the first reporting period for which this Standard is fully complied with):
 - (a) record all assets and liabilities that this Standard requires to be recorded;
 - (b) cease recording items as assets or liabilities if this Standard does not permit such recording;
 - (c) reclassify items previously recorded under another financial reporting framework as one type of asset, liability or component of equity that are a different type of asset, liability or component of equity under this Standard; and
 - (d) apply this Standard in measuring all recorded assets and liabilities.
- 29.8 The accounting policies an entity uses as at the date of transition to this Standard might differ from those it used for the immediately preceding reporting date using its previous financial reporting framework. The resulting adjustments arise from transactions, other events or conditions before the date of transition to this Standard. Consequently, an entity shall record those adjustments directly in retained earnings (or, if appropriate, another category of equity) as at the date of transition to this Standard.
- An entity may need to make estimates in accordance with this Standard at the date of transition to this Standard that were not required at that date under the entity's previous financial reporting framework. To achieve consistency with Section 27, those estimates made in accordance with this Standard shall reflect conditions that existed at the date of transition to this Standard. In particular, estimates as at the date of transition to this Standard of market prices, interest rates or foreign exchange rates shall reflect market conditions at that date.
- 29.10 On first-time adoption of this Standard, an entity shall not retrospectively change the accounting that it followed under its previous financial reporting framework for any of the following items:
 - (a) ceasing to record financial assets and financial liabilities. Financial assets and financial liabilities that an entity ceased recording under its previous financial reporting framework before the date of transition shall not be reinstated (ie recorded) upon adoption of this Standard. Conversely, for financial assets and financial liabilities an entity would have ceased recording under this Standard in a transaction that took place before the date of transition, but that continued to be recorded under the entity's previous accounting framework, the entity may elect to either: (i) cease recording them on adoption of this Standard; or (ii) continue recording them until disposed of or settled;
 - (b) accounting estimates;
 - (c) fair value measurements; and
 - (d) measuring non-controlling interests. The requirements of paragraph 4.5 to allocate profit or loss and total comprehensive income between non-controlling interests and owners of the parent shall be applied prospectively from the date of transition to this Standard.
- 29.11 Without limitation to the option in paragraph 29.4 for first-time adopters of this Standard transitioning from the application of Tier 1 or Tier 2 requirements of Australian Accounting Standards to continue applying those requirements to assets and liabilities existing on the transition date, an entity may use one or more of the following exemptions in preparing its first financial statements that conform to this Standard:
 - (a) fair value or current replacement cost as deemed cost. As at the date of transition to this Standard, a first-time adopter may elect to measure:
 - (i) an item of property, plant and equipment, an investment property or an intangible asset at its fair value; and
 - (ii) an item of inventory at its current replacement cost

and use that value as its deemed cost as at that date;

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- (b) separate financial statements. When an entity prepares separate financial statements, paragraph 8.5 requires it to account for its investments in notable relationship entities at any of:
 - (i) cost;
 - (ii) fair value through profit or loss, unless the entity makes an irrevocable election at the initial recording of a particular investment to present changes in its fair value in other comprehensive income; or
 - (iii) its equity method-based amount determined by following the procedures in paragraph 13.16.

If a first-time adopter measures such an investment at cost as at the date of transition, it may elect to deem the fair value of that investment at that date to be that investment's 'cost' (ie use 'deemed cost' to measure the investment);

- (c) restoration/rehabilitation liabilities included in the cost of property, plant and equipment. Paragraph 15.5(c) states that the cost of an item of property, plant and equipment includes the initial estimate of any related restoration, rehabilitation or other 'make good' obligation. A first-time adopter may elect to measure this component of the cost of an item of property, plant and equipment at the date of transition to this Standard, instead of on the date(s) when the obligation initially arose;
- (d) revenue. A first-time adopter may apply Section 20: *Revenue* either retrospectively or prospectively. When applying Section 20 prospectively, an entity shall:
 - (i) apply that section to contracts/arrangements that begin, and transactions that occur, after the date of transition to this Standard. Therefore, the entity does not change its accounting policy for any contracts/arrangements in progress at that date; and
 - (ii) disclose the nature of the changes in accounting policy; and
- (e) financial assets measured at fair value as at each measurement date. For a class of financial assets acquired or originated by the entity to generate both income and a capital return for it, and measured at fair value as at each measurement date in accordance with paragraph 10.7(a), the date of transition to this Standard may be deemed to be the date of initial recording of the first asset in that class. Consequently, if such a class of financial assets were held upon the date of transition to this Standard, the irrevocable election permitted by paragraph 10.7(a) to present changes in the fair value of that class in other comprehensive income may be made as at the date of transition to this Standard by deeming that date to be the date of initial recording of the first asset in that class.

Disclosures

29.12 Regardless of whether a first-time adopter of this Standard elects to apply this section or Section 9 on first-time adoption (see paragraph 29.3), the entity shall make the disclosures in paragraphs 29.13–29.18. The disclosure requirements specific to the application of either this section or Section 9 are set out in paragraphs 29.19–29.22 and paragraph 29.23, respectively. Each of the disclosures, including those for comparative periods, is required to the extent practicable, with disclosure of the existence of any omissions due to impracticability.

Disclosures common to transition under either Section 9 or 29

Explanation of transition to this Standard

- An entity shall explain how the transition from its previous financial reporting framework to this Standard affected its reported financial position, financial performance and cash flows. This explanation shall include a description of the nature of each change in accounting policy, except that, if the most recent previous financial statements of a first-time adopter of this Standard were special purpose financial statements, the entity may elect not to disclose such a description.
- 29.14 If an entity did not present financial statements for previous periods, it shall disclose that fact in its first financial statements that conform to this Standard.
- 29.15 An entity that has applied this Standard in a previous period shall disclose:
 - (a) the reason it stopped applying this Standard;
 - (b) the reason it is resuming the application of this Standard; and
 - (c) whether it applied this section or applied this Standard using a modified retrospective approach in accordance with Section 9.

- 29.16 An entity that, on first-time adoption of this Standard, presents comparative information on a different basis to that required by this Standard for subsequent periods shall:
 - (a) prominently label the comparative information that is not compliant with Tier 3 reporting requirements as being non-compliant with Tier 3 reporting requirements; and
 - (b) disclose the financial reporting framework under which it was prepared (eg special purpose financial reporting, Australian-Accounting-Standards financial statements (Tier 1) or Australian-Accounting-Standards financial statements (Tier 2)).
- 29.17 Regardless of whether a first-time adopter of this Standard elects to apply this section or Section 9 (see paragraph 29.3), on first-time adoption the entity:
 - (a) in accordance with paragraph 29.5, need not disclose comparative information for the previous comparable period if it did not disclose comparative information in its most recent previous financial statements. Therefore, entities applying a modified retrospective basis to adopt this Standard in accordance with Section 9 need not disclose comparative information under the accounting policy previously applied to an item when that information was not previously disclosed; and
 - (b) need not distinguish corrections of prior period errors and changes in accounting policies when disclosing adjustments to the carrying amounts of assets, liabilities or items of equity on initial adoption.
- 29.18 If an entity applies either of the exemptions in paragraph 29.17, it shall disclose that fact.

Disclosures required by entities applying this section

- 29.19 If, in accordance with the option in paragraph 29.3, an entity elects to apply the requirements of this section on first-time adoption of this Standard, it shall make the disclosures in paragraphs 29.21–29.22 in addition to those in paragraphs 29.13–29.18.
- 29.20 If, in accordance with the option in paragraph 29.4, an entity elects to continue applying all related Tier 1 or Tier 2 recording, measurement and disclosure requirements to particular assets or liabilities existing on the transition date for first-time adoption of this Standard, it shall disclose the accounting policy differences from those specified for Tier 3 entities in this Standard.

Reconciliations

- 29.21 In its first financial statements prepared using this Standard, an entity may elect to:
 - (a) include reconciliations of its equity determined in accordance with its previous financial reporting framework to its equity determined in accordance with this Standard for both of the following dates:
 - (i) the date of transition to this Standard; and
 - (ii) the end of the latest period presented in the entity's most recent annual financial statements determined in accordance with its previous financial reporting framework; and
 - (b) include a reconciliation of the profit or loss determined in accordance with its previous financial reporting framework for the latest period in the entity's most recent annual financial statements to its profit or loss determined in accordance with this Standard for the same period.
- 29.22 If an entity makes one or more of the elections in paragraph 29.11, it shall disclose that fact. In relation to paragraph 29.11(d), those disclosures shall include any change in accounting policy resulting from prospective application of Section 20 on first-time adoption of this Standard.

Disclosures required by entities applying Section 9

29.23 If, in accordance with the option in paragraph 29.3, an entity elects to apply the requirements of Section 9 on first-time adoption of this Standard, it shall make the disclosures required by paragraph 9.14 about changes in accounting policies in addition to those in paragraphs 29.13–29.18.

Appendix A Defined terms

[To be updated]

This appendix is an integral part of the Standard.

accounting estimates As defined in paragraph 9.17.

accounting policies As defined in paragraph 9.2.

accumulating leave As defined in paragraph 24.3.

acquiree The business or businesses that the acquirer obtains control of in an entity

combination.

acquirer The entity that obtains control of the acquiree.

borrowing costs As defined in paragraph 22.1.

carrying amount The amount at which an asset, or liability or equity is recorded in the Statement

of Financial Position.

cash Cash on hand and demand deposits.

cash equivalent As defined in paragraph 6.2.

cash flows Inflows and outflows of cash and cash equivalents.

class of assets A grouping of assets of a similar nature and use in an entity's operations.

compensation Compensation includes all employee benefits (as defined in Section 24:

Employee Benefits). Employee benefits include all forms of consideration paid, payable or provided by the entity, or on behalf of the entity (for example, by its parent or by a shareholder), in exchange for services rendered to the entity. It also includes such consideration paid on behalf of a parent of the entity in

respect of goods or services provided to the entity.

contract An agreement between two or more parties that creates enforceable rights and

obligations.

contractual interest rate

The rate that is specified in the contract upon a loan agreement or financial

contract between a borrower and a lender. The contractual interest rate does not take into consideration any fees, points paid or received, transaction costs and

other premiums or discounts on acquisition of the financial instrument.

date of transition to the Tier 3 The beginning of the earl

Standard

The beginning of the earliest period for which an entity presents full comparative information under the Tier 3 Standard in its first financial

comparative information under the fiel 5 Standard in its first infancial

statements that comply with the Tier 3 Standard.

depreciable amount
The cost of an asset, or other amount substituted for cost (in the financial

statements), less its residual value.

derecognition The removal of all or part of a recorded asset or liability from an entity's

Statement of Financial Position.

development (in Section 16:

Intangible Assets)

The application of research findings or other knowledge to a plan or design for the production of new or substantially improved materials, devices,

productions, processes, systems or services before the start of commercial

production or use.

donation

An acquisition of an asset by the entity for a cost to it of nil, a nominal amount or another amount significantly less than the asset's fair value, or a forgiveness (wholly or partially) of a liability owed by the entity.

employee benefits

As defined in paragraph 24.1.

entity combination

As defined in paragraph 17.1.

errors

As defined in paragraph 9.22.

exit price

As defined in paragraph 11.2.

financial asset

Any asset that is:

- (a) cash;
- (b) an equity instrument of another entity;
- (c) a contractual right:
 - (i) to receive cash or another financial asset from another entity; or
 - (ii) to exchange financial assets or financial liabilities with another entity under conditions that are potentially favourable to the entity; or
- (d) a contract that will or may be settled in the entity's own equity instruments and:
 - (i) under which the entity is or may be obliged to receive a variable number of the entity's own equity instruments; or
 - (ii) that will or may be settled other than by exchange of a fixed amount of cash or another financial asset for a fixed number of the entity's own equity instruments. For this purpose, the entity's own equity instruments do not include instruments that are themselves contracts for the future receipt or delivery of the entity's own equity instruments.

financial instrument

As defined in paragraph 10.1.

financial liability

Any liability that is a contractual obligation:

- (a) to deliver cash or another financial asset to another entity; or
- (b) to exchange financial assets or financial liabilities with another entity under conditions that are potentially unfavourable to the entity.

financial position

The relationship of the assets, liabilities and equity of an entity as reported in the Statement of Financial Position.

financial statements

As defined in paragraph 2.19.

financing activities

Activities that result in change in the size and composition of the equity and borrowings of the entity.

first-time adopter of the Tier 3 Standard An entity that presents its first annual financial statements that conform to the Tier 3 Standard, regardless of whether its previous accounting was full IFRS Accounting Standards or another set of accounting standards.

general purpose financial statements

A particular form of general purpose financial reports that provide information about the reporting entity's assets, liabilities, equity, income and expenses.

going concern

As defined in paragraph 2.6.

government

Government, government agencies and similar bodies whether local, national or international.

A parent and all its subsidiaries. group

Significantly more likely than probable. highly probable

Applying a requirement is impracticable when the entity cannot apply it after impracticable

making every reasonable effort to do so.

All domestic and foreign taxes that are based on taxable profits. Income tax also income tax

includes taxes, such as withholding taxes, that are payable by a subsidiary, associate, joint arrangement or notable relationship entity on distributions to the

reporting entity.

As defined in paragraph 16.2. intangible asset

As defined in paragraph 12.1. inventories

inventories held for distribution Assets:

> (a) held for distribution at no or nominal consideration in the ordinary course of operations;

> in the process of production for distribution at no or nominal (b) consideration in the ordinary course of operations; or

> (c) in the form of materials or supplies to be consumed in the production process or in the rendering of services at no or nominal consideration.

> The acquisition and disposal of long-term assets and other investments not

included in cash equivalents.

As defined in paragraph 14.3.

An agreement whereby the lessor conveys to the lessee in return for a payment or series of payments the right to use an asset for an agreed period of time.

Financial liabilities other than short-term trade payables on normal credit terms.

Buyers and sellers in the principal (or most advantageous) market for the asset or liability that have all of the following characteristics:

they are independent of each other, that is, they are not related parties as defined in Section 28: Related Party Disclosures;

(b) they are knowledgeable, having a reasonable understanding about the asset or liability and the transaction using all available information;

(c) they are able to enter into a transaction for the asset or liability; and

(d) they are willing to enter into a transaction for the asset or liability, that is, they are motivated but not forced or otherwise compelled to do so.

As defined in paragraph 2.15.

The payments over the lease term that the lessee is or can be required to make, excluding contingent rent, costs for services and taxes to be paid by and reimbursed to the lessor, together with:

- (a) for a lessee, any amounts guaranteed by the lessee or by a party related to the lessee; or
- (b) for a lessor, any residual value guaranteed to the lessor by:
 - (i) the lessee;
 - (ii) a party related to the lessee; or
 - (iii) a third party unrelated to the lessor that is financially capable of discharging the obligations under the guarantee.

investing activities

investment property

lease

loans payable

market participants

material

minimum lease payments

modified retrospective application (of a change in accounting policy or correction of prior period errors) As defined in paragraphs 9.11 and 9.24.

non-controlling interest

The equity in a subsidiary not attributable, directly or indirectly, to a parent.

not-for-profit entity

A not-for-profit entity is an entity whose principal objective is not the generation of profit. A not-for-profit entity can be a single entity or a group of entities comprising the parent entity and each of the entities that it controls.

notes (to financial statements)

As defined in paragraphs 7.1–7.2.

notable relationship

As defined in paragraph 8.1.

observable inputs

Inputs that are developed using market data, such as publicly available information about actual events or transactions, and that reflect the assumptions that market participants would use when pricing the asset or liability.

offsetting (netting off)

Grouping an asset and liability that are recorded and measured as separate units of account into a single net amount in the statement of financial position.

operating activities

The principal revenue-producing activities of the entity and other activities that

are not investing or financing activities.

operating unit

As defined in paragraph 17.4.

orderly transaction

A transaction that assumes exposure to the market for a period before the measurement date to allow for marketing activities that are usual and customary for transactions involving such assets or liabilities; it is not a forced transaction (for example a forced liquidation or distress sale).

ordinary share

An equity instrument that is subordinate to all other classes of equity instruments.

other comprehensive income

As defined in paragraphs 4.2–4.3.

owners

Holders of instruments classified as equity.

parent

An entity that has one or more subsidiaries.

performance

The relationship of the income and expenses of an entity, as reported in the statement of comprehensive income.

post-employment benefits

As defined in paragraph 24.1(c).

probable

As defined in paragraph 19.2(b).

profit or loss

The total of income less expenses, excluding the components of other comprehensive income.

promise

An obligation or common understanding between the entity and the provider to transfer goods or services.

property, plant and equipment

As defined in paragraph 15.2.

prospective application (of a change in accounting policy)

Applying the new accounting policy to transactions, other events and conditions after the date as at which the policy is changed.

provision

As defined in paragraph 19.1.

provider (in Section 20: Revenue)

A provider of an asset or assets to the entity such as:

- (a) a customer that has contracted with an entity to obtain goods or services that are an output of the entity's ordinary activities in exchange for consideration; or
- (b) a funding provider that provides resources to the reporting entity.

public accountability

An entity has public accountability if:

- (a) its debt or equity instruments are traded in a public market or it is in the process of issuing such instruments for trading in a public market (a domestic or foreign stock exchange or an over-the-counter market, including local and regional markets); or
- (b) it holds asset in a fiduciary capacity for a broad group of outsiders as one of its primary businesses (for example, banks credit unions, insurance companies, securities brokers/dealers, mutual funds and investment banks often meet this second criterion).

recoverable amount

As defined in paragraphs 23.4–23.6.

related party

A related party is a person or an entity that is related to the reporting entity, taking into account the principle in paragraph (c).

- (a) A person or a close member of that person's family is related to a reporting entity if that person:
 - (i) is a member of the key management personnel of the reporting entity or a parent of the reporting entity;
 - (ii) has control or joint control over the reporting entity; or
 - (iii) has significant influence over the reporting entity.
- (b) An entity is related to a reporting entity if any of the following conditions applies:
 - the entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others);
 - (ii) one entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member);
 - (iii) both entities are joint ventures of the same third entity;
 - (iv) one entity is a joint venture of a third entity and the other entity is an associate of the third entity;
 - (v) the entity is controlled or jointly controlled by a person identified in (a);
 - (vi) the entity, or any member of a group of which it is a part, provides key management personnel services to the reporting entity or to the parent of the reporting entity; or
 - (vii) a person identified in (a)(ii) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).
- (c) For a person or an entity to be identified as related to the reporting entity, it is unnecessary to identify which particular factor or condition listed in paragraph (a) or (b) is satisfied, provided that one or another of the conditions is satisfied. For example, if the reporting entity is uncertain whether it controls or only significantly influences another entity, this uncertainty does not preclude identification of that other entity as a related party.
- (d) In the context of this Standard, the following are not related parties:
 - two entities simply because they have a director or other member of key management personnel in common;



- (ii) any of the following simply by virtue of their normal dealings with an entity (even though they may affect the freedom of action of an entity or participate in its decision-making process):
 - (A) providers of finance;
 - (B) trade unions;
 - (C) public utilities; or
 - (D) government departments and agencies; and
- (iii) a customer, supplier, franchisor, distributor or general agent with whom an entity transacts a significant volume of business, merely by virtue of the resulting economic dependence.

related party transaction

As defined in paragraph 28.6.

relevant activities (of an investee)

As defined in paragraph 8.16.

reporting date

The end of the latest period covered by financial statements.

reporting period

The period covered by financial statements.

research

Original and planned investigation undertaken with the prospect of gaining new scientific or technical knowledge and understanding.

residual value (of an asset)

The estimated amount that an entity would currently obtain from disposal of an asset, after deducting the estimated cost of disposal, if the asset were already of the age and in the condition expected at the end of its useful life.

revenue

As defined in paragraph 20.1.

statement of cash flows

As defined in paragraph 6.1.

statement of changes in equity (or statement of changes in net assets)

As defined in paragraph 5.2.

statement of financial position

As defined in paragraph 3.1.

statement of income and retained earnings

As defined in paragraph 5.4.

statement of profit or loss and other comprehensive income

As defined in paragraph 4.2.

As defined in paragraph 25.1.

Tier 3 entity

tax expense

A not-for-profit private sector entity that:

- (a) does not have public accountability; and
- (b) is not prohibited from applying Tier 3 reporting requirements by legislation, its constituting document or another document.

total comprehensive income

The change in equity during a period resulting from transactions and other events, other than those changes resulting from transactions with owners in their capacity as owners (equal to the sum of profit or loss and other comprehensive income).

transaction costs

As defined in paragraph 11.4.

transport costs

The costs that would be incurred to transport an asset from its current location to its principal market.

unit of account

The right or the group of rights, the obligation or the group of obligations, or the group of rights and obligations, to which recognition criteria and measurement concepts are applied.

unobservable inputs

Inputs for which market data are not available and that are developed using the best information available about the assumptions that market participants would use when pricing the asset or liability.

useful life

The period over which an asset is expected to be available for use by an entity or the number of production or similar units expected to be obtained from the asset by an entity.



Appendix B Effective date

This appendix is an integral part of the Standard.

Effective date

[To be updated]

An entity shall apply this Standard for annual reporting periods beginning on or after ... [a date at least three years after the issue of this Standard]. Earlier application is permitted. If an entity applies this Standard earlier, it shall disclose that fact.



Appendix C Amendments to other Australian Accounting Standards

[To be updated]

This appendix sets out the amendments to other Australian Accounting Standards.

The amendments set out in this appendix apply to entities and financial statements in accordance with the application of the Standards set out in AASB 1057 *Application of Australian Accounting Standards*.

The amendments apply to annual reporting periods beginning on or after ... [the date as per paragraph B1]. If an entity applies this Standard to an earlier period, it shall also apply these amendments to that earlier period.

The amendments are made to the latest principal version of a Standard as subsequently amended, unless otherwise indicated. The amendments also apply, as far as possible and necessary, to earlier principal versions of the amended Standards when this Standard is applied for earlier periods.

This appendix uses underlining, striking out and other typographical material to identify some of the amendments to a Standard, in order to make the amendments more understandable. However, the amendments made by this appendix do not include that underlining, striking out or other typographical material. Amended paragraphs are shown with deleted text struck through and new text underlined. Ellipses (...) are used to help provide the context within which amendments are made and also to indicate text that is not amended.

AASB 10 Consolidated Financial Statements (July 2015)

Paragraph AG1 in the Australian application guidance is amended.

. . .

Australian Accounting Standards consist of two three Tiers of reporting requirements for preparing general purpose financial statements:

- (a) Tier 1: Australian Accounting Standards; and
- (b) Tier 2: Australian Accounting Standards Simplified Disclosures; and
- (c) Tier 3: Australian Accounting Standard Simplified Accounting.

AASB 1053 Application of Tiers of Australian Accounting Standards (June 2010)

Paragraphs 7, 13 and 16 are amended; and paragraphs 9A, 16A–16D, 18E, 20B–20C and 25–28 are added. Sub-headings are added before paragraphs 16A and 20B.

. . .

- Australian Accounting Standards consist of two three Tiers of reporting requirements for preparing general purpose financial statements:
 - (a) Tier 1: Australian Accounting Standards; and
 - (b) Tier 2: Australian Accounting Standards Simplified Disclosures; and
 - (c) Tier 3: Australian Accounting Standard Simplified Accounting.

. . .

9A Tier 3: Australian Accounting Standard – Simplified Accounting comprises simplified recognition, measurement, presentation and disclosure requirements for Tier 3 entities. The Tier 3 requirements are set out in AASB 10XX General Purpose Financial Statements – Not-for-Profit Private Sector Tier 3 Entities.

. . .

- Tier 2 reporting requirements shall, as a minimum, apply to the general purpose financial statements of the following types of entities:
 - (a) ...

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- (b) not-for-profit private sector entities that do not apply the Tier 3 reporting requirements in AASB 10XX General Purpose Financial Statements Not-for-Profit Private Sector Tier 3 Entities; and
- (c) ...
- Disclosures under Tier 2 reporting requirements are the minimum disclosures required to be included in general purpose financial statements of for-profit entities, public sector entities and not-for-profit private sector entities that are not permitted to prepare general purpose financial statements under Tier 3 reporting requirements. Entities may include additional disclosures to those required by the substantially reduced Tier 2 disclosure requirements by using Tier 1 reporting requirements as a guide if, in their judgement, such additional disclosures are consistent with the objective of general purpose financial statements.

Application of Tier 3 Reporting Requirements

- Tier 3 reporting requirements shall, as a minimum, apply to the general purpose financial statements of not-for-profit private sector entities that:
 - (a) do not have public accountability; and
 - (b) are not prohibited from applying Tier 3 reporting requirements by the relevant legislation, constituting document or other document.

These entities may elect to apply Tier 1 or Tier 2 reporting requirements in preparing general purpose financial statements.

- 16B Entities applying Tier 3 reporting requirements would not be able to state compliance with IFRSs.
- Whilst Tier 3 reporting requirements are available under this Standard for general purpose financial statements of not-for-profit private sector entities referred to in paragraph 16A, regulators might exercise a power to require such entities to apply Tier 1 or Tier 2 reporting requirements.
- Disclosures under Tier 3 reporting requirements are the minimum disclosures required to be included in general purpose financial statements of not-for-profit private sector entities referred to in paragraph 16A. Entities may include additional disclosures using Tier 1 or Tier 2 reporting requirements as a guide if, in their judgement, such additional disclosures are consistent with the objective of general purpose financial statements.

...

- When applying Tier 3 reporting requirements for the first time, an entity shall apply the first-time application requirements set out in AASB 10XX *General Purpose Financial Statements Not-for-Profit Private Sector Tier 3 Entities.* Pursuant to paragraph 29.3 of AASB 10XX, an entity elects to apply either:
 - the first-time application requirements in Section 29 of AASB 10XX, including the disclosures in paragraphs 29.13–29.22; or
 - (b) the requirements in Section 9 of AASB 10XX on a modified retrospective basis. An entity selecting this option shall also apply the disclosure requirements in paragraphs 29.13–29.18 and 29.23 in Section 29 of AASB 10XX.

Reapplication of Tier 3 Reporting Requirements

- 20B An entity that:
 - (a) has applied Tier 3 reporting requirements in a previous reporting period; but
 - (b) whose most recent previous annual financial statements did not contain an explicit and unreserved statement of compliance with Tier 3 reporting requirements; and
 - (c) is resuming the application of Tier 3 reporting requirements;

shall:

(d) apply all the relevant requirements of Section 29 of AASB 10XX, or the option for modified retrospective application of Tier 3 reporting requirements in accordance with Section 9 of AASB 10XX as if the entity had never stopped applying Tier 3 reporting requirements, if the entity did not apply all applicable recognition and measurement requirements of AASB 10XX; or

- (e) not apply Section 29 of AASB 10XX, or the option for modified retrospective application of Tier 3 reporting requirements in accordance with Section 9 of AASB 10XX, if the entity applied all applicable recognition and measurement requirements of AASB 10XX.
- Entities described in paragraph 20B(a)–(c) resume the application of Tier 3 reporting requirements effectively using the same approach as an entity would for first transitioning to Tier 3 reporting requirements set out in paragraph 18E. Accordingly, an entity that did not comply with Tier 3 reporting requirements due solely to omitting some disclosures, but otherwise continued to apply all applicable recognition and measurement requirements of AASB 10XX, is prohibited from applying either Section 9 or Section 29 of AASB 10XX on returning to Tier 3 reporting requirements. Instead, it continues applying applicable recognition and measurement requirements, whether it had previously initially applied Section 9 or Section 29 of AASB 10XX. However, if such an entity did not continue to apply all applicable recognition and measurement requirements of AASB 10XX in its most recent previous annual financial statements, that entity is required to apply Section 29 of AASB 10XX, or the option for modified retrospective application of Tier 3 reporting requirements in accordance with Section 9 of AASB 10XX, on resuming the application of Tier 3 reporting requirements.

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- An entity transitioning from preparing general purpose financial statements in accordance with Tier 3 reporting requirements to preparing general purpose financial statements in accordance with Tier 1 reporting requirements for the first time shall apply all the relevant requirements of AASB 1.
- An entity transitioning from preparing general purpose financial statements in accordance with Tier 3 reporting requirements to preparing general purpose financial statements in accordance with Tier 2 reporting requirements for the first time shall, subject to paragraph 27, apply either:
 - (a) all the relevant requirements of AASB 1; or
 - (b) Tier 2 reporting requirements directly using the requirements in AASB 108.
- An entity applying paragraph 26 is not required to:
 - (a) restate comparative information presented for prior periods as if the Tier 2 reporting requirements had been applied from the beginning of the earliest prior period presented;
 - (b) provide comparative information for new disclosures made in accordance with the Tier 2 reporting requirements; or
 - (c) distinguish corrections of errors made in periods prior to first-time adoption of the Tier 2 reporting requirements and changes in accounting policies.
- An entity applying paragraph 27(a) to not restate comparative information in its first financial statements compliant with Tier 2 reporting requirements need not provide the reconciliations required by AASB 1060 paragraphs 210(b) and (c). The entity shall:
 - (a) present two statements of financial position, two statements of profit or loss and other comprehensive income, two separate statements of profit or loss (if presented), two statements of cash flows and two statements of changes in equity and related notes, as follows:
 - the statements and related notes as at the end of the first Tier 2 reporting period, compliant with Tier 2 reporting requirements; and
 - (ii) the statements and related notes presented in its most recent previous financial statements compliant with Tier 3 reporting requirements;
 - (b) disclose a reconciliation of its equity presented in its most recent previous financial statements compliant with Tier 3 reporting requirements to its equity determined in accordance with Tier 2 reporting requirements at the date of transition to Tier 2 reporting requirements;
 - (c) disclose a description of the main adjustments that would have been required to make the comparative statement of profit or loss and other comprehensive income and separate statement of profit or loss (if presented) compliant with Tier 2 reporting requirements. The entity need not quantify those adjustments; and
 - (d) prominently label the comparative information that is not compliant with Tier 2 reporting requirements as such.

AASB 1057 Application of Australian Accounting Standards (July 2015)

Paragraphs 21, 21A and 26 are added.

. . .

- 21 AASB 10XX General Purpose Financial Statements Not-for-Profit Private Sector Tier 3 Entities applies to not-for-profit private sector entities that:
 - (a) do not have public accountability; and
 - (b) are not prohibited from applying Tier 3 reporting requirements by the relevant legislation, constituting document or other document.
- 21A Entities applying AASB 10XX are not required to apply other Australian Accounting Standards except as required by paragraph 1.3 of AASB 10XX.

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Entities applying AASB 10XX are not required to apply the Interpretations.

Notes to Board members

Staff have re-examined the illustrative examples and have made amendments to improve the readability, and to make technical and editorial corrections or improvements following further staff consideration:

- 1) For assessing loss of service potential Example A and Example B have been amended to give more clarity to applying the requirements in Section 23. These changes aim to enhance understandability by clearly stepping through the scenarios and linking each step to the relevant requirements. In Example A, staff also added different types of inventories held for distribution to demonstrate assessing loss of service potential. Staff have reassessed Example C and consider it is not a viable example for assessing loss of service potential. Staff will bring a different example for the Board's consideration at the next meeting (Q1 2026).
- 2) Contingent Assets Example J has been refined to give better clarity.

Staff will bring any amendments of Example D, relating to employee benefits, and examples relating to revenue recognition as part of the Board's consideration of Sections 24 and 20 at the next meeting (Q1 2026).

Illustrative examples

These illustrative examples accompany, but are not part of, the Standard. They illustrate aspects of the Standard, but are not intended to provide interpretative guidance.

IE1 The following examples portray hypothetical situations. They are intended to illustrate how a Tier 3 entity might apply some of the requirements of this Standard to particular types of transactions, on the basis of the limited facts presented. Although some aspects of the examples might be present in actual fact patterns, all relevant facts and circumstances of a particular fact pattern need to be evaluated when applying this Standard.

Assessing loss of service potential

IE2 Examples A, B and C illustrate the requirements in Section 23 on assessing the loss of service potential and related measurement requirements in Section 12.

Example A – Loss of service potential due to spoilage

Entity A operates a food bank. It purchases items of food to be included in food parcels, and also receives donations of food from supermarkets and individuals. Because the amount of donations it receives is unpredictable, it can have a surplus of certain food items.

These food items might suffer a loss of service potential due to their age as they approach their expiry date. If Entity A has more items than are required for the food parcels, it might need to either sell the items at a discount or dispose of them once the expiry date has passed.

At the reporting date, Entity A must assess whether any of the events set out in paragraph 23.2 has occurred to any material inventories of its food items and, if so, whether the affected items have suffered a loss of service potential.

At the reporting date, Entity A identifies its inventory includes a pallet of fresh food items that have passed their use-by date. In accordance with paragraphs 23.2 and 23.3, as the perishable items are considered spoilt, Entity A must determine the recoverable amount of those inventories.

These inventories held for distribution must be measured at their cost less any loss of service potential, being their recoverable amount. In accordance with paragraphs 23.5 and 23.6, Entity A estimates the amount of spoilt inventory that it will not be able to use in the food parcels (the loss of service potential) by reference to the assets' cost, as these items will need to be disposed of rather than sold at a discount. Entity A reduces the carrying amount of the inventories by the quantity identified as spoilt and records a corresponding expense.

There is no loss of service potential to record for donated inventory measured at a nil cost because the items' recoverable amount cannot be lower than their carrying amounts (nil).

At the reporting date, Entity A also identifies that it holds a pallet of tinned food items that it intends to distribute and that are nearing their best-before date. In accordance with paragraph 23.2, as the perishable items neither have spoilt nor become obsolete, Entity A does not identify and calculate any possible loss of service potential of these inventories. The inventory is not written down and, in accordance with paragraph 12.4(a), is carried at its cost in the statement of financial position.

Entity A further discovers that it has a pallet of surplus pantry staples that are nearing their best-before date. Entity A decides to sell these items at a discount, at which time the items cease to be inventory held for distribution. In accordance with paragraph 12.4, the carrying amount of these items no longer has regard to the items' loss of service potential. However, similar to inventory held for distribution, their recoverable amount is only estimated if one of the indicators of impairment in paragraph 23.2 is present. Because the perishable items neither have spoilt nor become obsolete, Entity A does not calculate the recoverable amount (selling price less costs to complete and sell) of these inventories. The inventory is not written down and is carried at its cost in the statement of financial position.

Example B – Loss of service potential due to reduction in external demand for goods or services

Entity B, which has the objective of helping long-term unemployed people find work, runs courses on job interview preparation. Entity B has prepared printed course materials that are provided to all participants, and has sufficient stock for the expected life of the current course. The course materials are classified as inventories held for distribution.

The courses are subsidised by the government, and as a result Entity B is able to offer the courses for no charge.

During the reporting period, as a result of a change of government policy, the courses cease to be subsidised by the government. Entity B has insufficient resources to cover all the costs itself, and introduces a small charge for the courses to cover the cost of hiring the venue and providing lunch. Because the small charge is for a nominal amount, Entity B continues to classify the course materials as inventories held for distribution.

Because of the introduction of the small charge, the number of interested participants reduces, and Entity B runs the courses less frequently. As a result, it is unlikely that Entity B will be able to use all the existing printed course materials.

At the reporting date, Entity B assesses whether any of the events identified in paragraph 23.2 has occurred to the course materials and, if so, whether the affected items have suffered a loss of service potential.

Entity B notes that, as a consequence of the change in circumstances, it has suffered a reduction in external demand for its goods or services and its capacity to provide services has been affected adversely as a result (thus satisfying the indicator in paragraph 23.2(b)). As required by paragraphs 23.5 and 23.6, Entity B estimates the amount of the course materials that it will not be able to use, and adjusts the carrying amount of its inventories of course materials in proportion to the amount it estimates will remain unused, and records a corresponding expense.

Example C – Loss of service potential due to changed strategy

[Replacement to be developed]

Entity C is a not-for-profit entity with activities that include operating a small animal shelter. Due to increased operating costs and difficulties in attracting suitable volunteers, the management of Entity C decided that operating the animal shelter is no longer viable, particularly in view of the entity's level of funding, and will cease shortly after the end of the reporting period. The recorded assets related specifically to the animal shelter (the buildings, bedding, equipment and leashes) remained in good condition, and were not affected by physical obsolescence additional to that already accounted for in depreciation calculations. Entity C had accounted for those assets using the cost model in paragraph 15.12.

In accordance with paragraph 15.19, at the reporting date, Entity C assesses whether the capacity to provide services of any of its recorded assets related specifically to the animal shelter has been affected adversely as a result of the entity having changed its strategy. Because the answer to that question is yes, Entity C is required to review the residual value, depreciation method and useful life of the recorded assets related specifically to the animal shelter. Entity C concludes that the assets related specifically to the animal shelter have no remaining useful life. In accordance with paragraphs 23.3 and 23.6–23.8, Entity C assesses those assets for potential impairment by comparing their carrying amount with their recoverable amount, that is, the higher of their fair value less costs to sell and value in use (which is fair value less costs to sell, because the assets have no future use to Entity C). In this instance, the residual value (reassessed in accordance with paragraph 15.19) and recoverable amount (assessed in accordance with paragraph 23.3) of each asset is the same amount, that is, fair value less costs to sell.

Entity C assesses that the equipment and leashes can readily be sold for an amount (net of selling costs) at least equalling their carrying amounts, and does not record an impairment loss in respect of them. It concludes that, due to their fixed location and the cost of demolishing them to sell their materials, the animal shelter

buildings could not be sold. It also concludes that the used bedding could not be sold because of a lack of buyers and because its selling price would not exceed the cost of finding buyers. Therefore, Entity C concludes that the recoverable amount of the animal shelter buildings and bedding is nil and writes off those assets. Because those assets were not previously revalued, their carrying amounts were written off as an expense.

Employee benefit expenses and related on-costs

[To be updated]

IE3 Example D illustrates application of the measurement requirements in Section 24 to measure employee benefit expenses and related on-costs (including a possible method of measuring long-service leave to consider the likelihood that accumulating long-service leave entitlements not yet vested will vest in the future).

Example D – Employee benefit expenses and related on-costs

Entity D (a smaller NFP entity) incurs the following expenses for employee benefits and related on-costs during the reporting period. Being a public benevolent institution, Entity D is exempt from the 4.85% payroll tax that would otherwise be levied (which would be an additional on-cost). Entity D's workers' compensation insurance expense (often treated as an on-cost) is not part of its employee benefits. Some entities also treat their employee superannuation costs as an on-cost. However, because those costs are a form of consideration given in exchange for services rendered by employees, they form part of employee benefits (and, therefore, within the scope of Section 24) even if described as an on-cost.

The following amounts, including the percentages used, are assumed for illustrative purposes only and are not intended to indicate a required method of calculation or signify benchmark percentages for the probability of vesting of employee benefits.

Table 1 Illustrative example of employee benefit expenses and related on-cost based on the nature of the expenses

Nature of cost/calculation	Amount \$
Wages and salaries, excluding annual leave	705,000
Annual leave	<u>58,750</u>
Wages and salaries, including annual leave	763,750
Long-service leave (based on an expected value that takes into account the estimated probability that current employees will qualify for vested long-service leave benefits: see Table 2 and Table 3 below for calculations)	9,004
Base for defined contribution superannuation	772,754
Defined contribution superannuation plan expense at 11.5%	88,867
Base for workers' compensation premium	861,621
Workers' compensation insurance premium at 1.8%	<u>15,509</u>
Total employee benefit expenses and workers' compensation insurance expense	<u>877,130</u>

Paragraph 24.8 requires that long-service leave measurements take into account the likelihood that any long-service leave unvested at the end of the reporting period will vest in a future period. Therefore, Entity D estimates the probability-weighted expected value of its long-service leave obligations for its ten employees, as illustrated below. The probabilities are based on Entity D's records of the periods of service rendered by employees in the past, and reflect that, under the relevant legislation, long-service leave obligations vest after

seven years of continuous employment. As noted in paragraph 24.8, an entity is not required to develop a probability-weighted estimate of the long-service leave provision; for example, a 'most likely outcome' estimate may be used.

Table 2 shows the vesting probabilities used in the calculations.

Table 2 Illustrative probabilities of long-service leave entitlements vesting

Years of service completed by the end of the reporting period	0	1	2	3	4	5	6	7 or more
Probability that long-service leave entitlements will vest (= 100% once 7 years of service completed)	50	60	70	80	85	90	95	100

Table 3 shows the calculation of the long-service leave amount accrued by Entity D for its ten employees during the reporting period. For simplicity, the amount of \$9,004 does not include the remeasurement of the opening balance of the provision for long-service leave for changes in wage and salary rates during the reporting period or for changes in the estimated probability that long-service leave obligations will vest in a future period.

Table 3 Illustrative probability-weighted estimate of long-service leave accrual

Employee name	Years of service completed by the end of the reporting period	Probability that long- service leave entitlements will vest	Salary for the reporting period (\$)	Probability- weighted salary (\$)
A	0	50%	70,000	35,000
В	0	50%	70,000	35,000
C	0	50%	65,000	32,500
D	2	70%	65,000	45,500
Е	2	70%	60,000	42,000
F	4	85%	75,000	63,750
G	5	90%	70,000	63,000
Н	5	90%	65,000	58,500
I	7	100%	90,000	90,000
J	12	100%	<u>75,000</u>	<u>75,000</u>
	Total		<u>705,000</u>	<u>540,250</u>

In this example, it is assumed that legislation prescribes that at any time after completing 7 years of continuous employment with one employer, an employee is entitled to an amount of long-service leave on ordinary pay equal to 1/60th of the

9,004

employee's total period of continuous employment (ie 0.867 of a week per year of continuous employment) less any period of long-service leave taken during that period. As such, long-service leave is accrued at 1/60th of each employee's probability-weighted remuneration for continuous service during the reporting period (ie $$540,250 \times 1/60$).

Recording revenue

[To be updated]

- IE4 Examples E–H illustrate the requirements in applying Section 20 on how to record revenue, with or without a deferred revenue obligation for:
 - (a) fundraising activities;
 - (b) grants to provide specified community services;
 - (c) a general purpose grant internally designated to provide particular community services; and
 - (d) a grant to construct an asset.

Example E – Fundraising activities

Charity E generates revenue through two main fundraising activities: selling chocolates for cash and an annual gala event at which attendees receive entertainment and a meal. The next gala event will be held on 15 July 20X0. As at 30 June 20X0 (Charity E's reporting date), Charity E has sold 250 tickets for \$200 each (and received \$50,000).

Revenue from the sale of chocolates will be recorded when the chocolates are provided to customers, which occurs simultaneously with the cash sales, in accordance with paragraph 20.3(b), ie in the next financial year ending 30 June 20X1.

In accordance with paragraphs 20.3(a), 20.7(a) and 20.9 – 20.10, the \$50,000 proceeds from advance sales of tickets to the gala event are recorded as deferred revenue obligations (liabilities) to provide entertainment and a meal at the gala event. This is because Charity E and purchasers of the tickets to the gala event have a common understanding (based on publicity and details on the tickets) that, in return for the ticket proceeds, Charity E will perform in a particular manner (provide entertainment and a meal) resulting in the related expenditure of the cash proceeds. In accordance with paragraph 20.4, the liabilities recorded in accordance with paragraph 20.3(a) are measured at the same amount as the amount recorded for the sales proceeds. Thus, the entire amount of the sales proceeds is deferred as a liability until the gala event is held, even though there is an implicit (albeit unquantified) donation element included in the ticket price of \$200. As at 30 June 20X0, Charity E records a liability for the \$50,000 sales proceeds received in advance. In accordance with paragraphs 20.8 and 20.11, the revenue ceases to be deferred (ie is recorded in profit or loss) when the gala event is held (on 15 July 20X0).

Example F - Grant to provide specified community services

Community Centre F applies for a grant to fund the provision of an IT training programme for the community members to be conducted on the Centre's premises for a two-year period commencing on 1 July 20X1, with the amount of the grant dependent on the number of sessions provided. The grant of \$45,000 is received on 15 May 20X1. In accordance with paragraphs 20.3(a), 20.7(a) and 20.9-20.10, the \$45,000 grant is recorded as a deferred revenue obligation (liability) to provide training services. This is because Community Centre F and the grantor have a common understanding (based on the approved grant application) that, in return for the grant, Community Centre F will perform in a particular manner (provide training) resulting in the expenditure of the grant money. In accordance with paragraph 20.4, the liability recorded in accordance with paragraph 20.3(a) is measured at the same amount as the amount recorded for the grant money. Thus, the \$45,000 grant is deferred as a liability until the training services are provided. As at 30 June 20X1, Community Centre F records a liability for \$45,000 for the grant, because the provision of promised training services had not commenced. In accordance with paragraph 20.8 and 20.11, the revenue ceases to be deferred (ie is recorded) progressively as the training services are provided, over the two-year period beginning on 1 July 20X1. Thus, as at 30 June 20X2, Community Centre F records a remaining liability of \$22,500 for the unperformed portion of the service obligation, determined based on the remaining number of training sessions. For the financial year ending on 30 June 20X2, Community Centre F records grant revenue of \$22,500 for the training services provided.

Example G – General purpose grant internally designated for particular activities

In this scenario, the facts are the same as those described above in Example F, except that Community Centre G received a general purpose grant of \$45,000 on the same date, which its committee of management decided before 30 June 20X1 to expend on a two-year IT training programme to be conducted on the Centre's premises for its volunteers commencing on 1 July 20X1. Community Centre G and the grantor do not have a common understanding that, in return for the grant, Community Centre G will perform in a particular manner resulting in the related expenditure, transfer or using up of the grant money or other assets. Therefore, in accordance with paragraph 20.3, a deferred revenue obligation does not arise from receipt of the grant asset (cash) on 15 May 20X1 and Community Centre G records cash of \$45,000 and revenue for the same amount as at 15 May 20X1. Paragraph 20.13 states that internal expectations or decisions by those charged with governance about how or when an entity expects to use funds received from donations, grants and bequests are not relevant when determining whether a deferred revenue obligation of the entity exists.

Example H – Grant to construct an asset

Community Centre H applies for a capital grant of \$180,000 to fund most of the cost of constructing an extension to its community hall building, with the remainder of the cost to be met using the Centre's accumulated funds. The grant of \$180,000 is received on 30 June 20X2. In accordance with paragraphs 20.3(a), 20.7(b) and 20.9 – 20.10, the \$180,000 grant is recorded as a deferred revenue obligation (liability) to construct a building extension. This is because Community Centre H and the grantor have a common understanding (based on the approved grant application) that, in return for the grant, Community Centre H will perform in a particular manner (construct a building extension) resulting in the expenditure of the grant money. In accordance with paragraph 20.4, the liability recorded in accordance with paragraph 20.3(a) is measured at the same amount as the amount recorded for the grant money. Thus, the grant is deferred as a liability until the construction occurs. As at 30 June 20X2, Community Centre H records a liability for \$180,000 for the capital grant, because the promised construction work had not commenced. In accordance with paragraph 20.8(b) and 20.11, the revenue ceases to be deferred (ie is recorded) progressively as the construction activities occur. In accordance with paragraph 20.24(c), Community Centre H uses judgement to determine the pattern of recording revenue over the course of constructing the building extension. It concludes that the incurrence of costs of constructing the building extension provides a faithful representation of the stage of completion of the building extension. As at 30 June 20X3, the building extension works were almost complete. By that date, Community Centre H had spent \$150,000 of the capital grant money on works performed, and Community Centre H records grant revenue of \$150,000 for the financial year ending on 30 June 20X3.

Contingent assets

IE5 Example J illustrates the application of Section 19 to contingent assets in the form of pledges.

Example J – Pledges

Before the end of the reporting period, Charity J received written pledges from corporate donors of \$200,000 to fund the building of water wells to provide clean drinking water in developing countries in response to an appeal for donations for that explicit purpose. Based on its previous experience with pledged donations, Charity J estimates it will receive \$120,000).

As at the end of the reporting period, no cash had been received, and Charity J does not have an enforceable right to the pledged amounts.

In accordance with paragraph 20.19, Charity J does not record the pledged donations as an asset because it has not yet received the promised cash, nor is it virtually certain to do so (see paragraph 19.16). However, Charity J determines the pledges meet the definition of a contingent asset, because those amounts are possible assets arising from past events (receipt of the written pledges), the existence of which will only be confirmed by the occurrence of one or more uncertain future events (cash transfer to Charity J) not wholly within Charity J's control.

Based on its experience with previous appeals, Charity J concludes that the receipt of an inflow from the pledged donations is probable even if some pledges are not honoured. Accordingly, in accordance with paragraph 19.17, Charity J discloses the pledges as a contingent asset and that its estimate of the amount that will be received is \$120,000.

(When received, the donations that were pledged are recorded as revenue only as the wells are built. This treatment recognises that, because the donations were made in response to the specific appeal, Charity J and its donors have a common understanding that Charity J will only use these amounts for the building of the water wells, consistent with paragraphs 20.3(a) and 20.6–20.10 of this Standard.)



Basis for Conclusions

[To be updated]

This Basis for Conclusions accompanies, but is not part of, AASB 10XX General Purpose Financial Statements – Not-for-Profit Private Sector Tier 3 Entities.

Introduction

BC1 This Basis for Conclusions summarises the Australian Accounting Standards Board's considerations in reaching the conclusions in this Exposure Draft (ED). It sets out the reasons why the Board developed the ED, the approach taken to developing the ED and the bases for key decisions made. In making decisions, individual Board members gave greater weight to some factors than to others.

The need for a new Standard for not-for-profit private sector Tier 3 entities

- At present, entities that are required to prepare financial statements in accordance with Australian Accounting Standards (AAS) have a choice of two Tiers:
 - (a) Tier 1 reporting requirements apply to the general purpose financial statements (GPFS) of for-profit private sector entities that have public accountability and the Australian Government and State, Territory and Local Governments; and
 - (b) Tier 2 reporting requirements apply to the GPFS of for-profit private sector entities that do not have public accountability, not-for-profit (NFP) private sector entities and public sector entities, whether for-profit or NFP, other than the Australian Government and State, Territory and Local Governments.
- BC3 However, NFP entities may self-assess that they are not a 'reporting entity' as defined in SAC 1 *Definition of the Reporting Entity*, and therefore elect to prepare special purpose financial statements (SPFS). The AASB has received stakeholder feedback and collected evidence indicating that the reporting entity concept, long embedded in the Australian accounting framework, was not working as originally envisaged. Rather, there remains a large population of Australian entities preparing SPFS, rather than GPFS (which facilitate the comparability of financial reporting for entities in similar economic circumstances). Research has indicated a mismatch between users' needs and the information reported by non-corporate and small entities. Where charities prepared SPFS, research has shown that only 26% of charities sampled stated compliance with recognition and measurement (R&M) requirements of AAS, leading to a lack of comparability between charities in financial reporting. Considering resource limitations and noting that recommendations arising from the 2017-2018 review of Australian Charities and Not-for-profits Commission (ACNC) legislation were likely to inform the Board's work on the NFP private sector, the Board in 2018 decided to progress its Australian financial reporting framework project in stages, beginning first with the review and revision of the reporting framework for for-profit private sector entities.
- BC4 In 2018, the Board published Invitation to Comment ITC 39 Applying the IASB's Revised Conceptual Framework and Solving the Reporting Entity and Special Purpose Financial Statement Problems (May 2018). ITC 39 was intended to improve the quality of financial statements of both for-profit and NFP entities through Board actions to extend the population of entities preparing GPFS. The work on for-profit private sector entities was completed with the issue of AASB 1060 General Purpose Financial Statements Simplified Disclosures for For-Profit and Not-for-Profit Tier 2 Entities (March 2020) and AASB 2020-2 Amendments to Australian Accounting Standards Removal of Special Purpose Financial Statements for Certain For-Profit Private Sector Entities (March 2020). The outcome of that stage of the Board's project was to require many for-profit entities required by legislation or their constituting document or another document to prepare GPFS that comply with AAS.

AASB Research Report No. 11 Review of Special Purpose Financial Statements: Large and Medium-Sized Australian Charities (August 2019) examined 407 large and medium-sized charities, drawn from a population of 5,674 charities, that claimed to lodge SPFS for the 2016 financial year. AASB Research Report No. 16 Financial Reporting By Non-Corporate or Small Entities (Public Sector Entities, Private Sector SMEs, Not-for-Profits including Charities and Non-Government Organisations) (April 2021) presented an overview of the academic literature on financial reporting by non-corporate and small entities with the objective of answering key questions about the coverage of their reports, their user and stakeholder needs, and their compliance and regulatory oversight.

- BC5 Following the completion of the financial reporting framework for for-profit private sector entities, the Board has developed proposals in Exposure Draft ED 334 *Limiting the Ability of Not-for-Profit Entities to Prepare Special Purpose Financial Statements* to respond to stakeholder concerns and research findings regarding the subject matter of its title. ED 334 proposes extending the application of AAS to a wider range of NFP entities and no longer predicating the applicability of a Standard on an entity's identification as a reporting entity. ED 334 proposes:
 - (a) amendments to AAS to remove the ability of the following NFP entities to prepare SPFS:
 - (i) NFP entities that are required by legislation to comply with either AAS or 'accounting standards'; and
 - (ii) other NFP entities that are only required by their constituting document or another document to comply with AAS (provided that the relevant document was created or amended on or after [date]); and
 - (b) to provide relief from restating and presenting comparative information in the year of transition for NFP entities transitioning to Tier 2 reporting requirements for the first time, to balance appropriately the needs of users of financial statements with the costs of moving from SPFS.
- BC6 In addition, following feedback on ITC 39, the Board became aware that it may be necessary to develop one or more further reporting tiers (sets of accounting requirements) for use by NFP private sector entities. The Board recognises that there is likely to be a larger population of smaller NFP private sector entities that are required to prepare GPFS, compared to for-profit private sector entities, because the relevant legislation often sets a lower threshold to require NFP private sector entities to prepare financial statements that comply with the requirements specified by AAS. Consequently, the Board decided there is a need to develop a further reporting tier for NFP private sector entities concurrently with superseding the SAC 1 reporting entity concept for NFP private and public sector entities. This further reporting tier will serve as a proportionate response for smaller entities, with less complex transactions and other events, that are required by legislation or otherwise (such as by a constituting document) to prepare financial statements that comply with AAS.² This ED has been developed in conjunction with ED 334 to:
 - (a) reduce the reporting burden of smaller NFP private sector entities, for which the existing Tier 1 and Tier 2 reporting requirements for preparing GPFS may be overly complex to apply; and
 - (b) continue to complement other Government red tape reduction initiatives to reduce the financial reporting burden for entities.
- BC7 In October 2022, the Board issued Discussion Paper Development of Simplified Accounting Requirements (Tier 3 Not-for-Profit Private Sector Entities) (DP) setting out, and inviting comments on, its preliminary views about an additional (third) tier for use by NFP private sector entities, being Tier 3 GPFS, and the key features of that further reporting tier (Tier 3 Standard). The Board took the view in the DP and in this ED that as a standard-setter its role is not to, nor does it have the ability or legislative power to, develop financial reporting thresholds in AAS because it views the establishment of appropriate reporting thresholds and any application of a specific form of GPFS to be more appropriately within the remit of the relevant legislation or regulatory authority. Ultimately, the Board developed its proposals for the Tier 3 Standard based on the revised ACNC 'medium' size charities (revenue of \$500,000 to less than \$3 million) as a reference point for identifying transactions and balances of smaller NFP private sector entities that might be permitted to prepare Tier 3 GPFS (Tier 3 entities). However, basing the proposals on ACNC 'medium-size' charities was not intended to act as any financial reporting thresholds to be included in AAS. The key features of that further reporting tier are reporting requirements that are simpler to understand and apply than existing reporting requirements. The Board reached its preliminary views on the form and key accounting aspects of a further tier of general purpose financial reporting for NFP private sector entities by considering how it could contain or reduce preparer compliance costs while making financial statements more useful to users. In doing so, the Board considered how it might depart from existing AAS through simpler expression, R&M requirements and approaches to presentation and disclosure.

Principles and considerations applied in developing the Tier 3 reporting requirements

BC8 In developing the Tier 3 GPFS framework, the Board used a set of principles to make the new Tier 3 Standard meet the aims in paragraph BC7 for a simplified Standard for NFP private sector Tier 3 entities, treating 'user needs' and 'cost/benefit' as overarching considerations in applying the following principles:

² See AASB Research Report No. 10 Legislative and Regulatory Financial Reporting Requirements (Updated) (September 2022) identifying the private sector and public sector NFP entities with financial reporting obligations under Federal and State/Territory legislation that are required to prepare financial statements complying with AAS.

- (a) the development of Tier 3 reporting requirements is subject to the AASB Not-for-Profit Entity Standard-Setting Framework;
- (b) Tier 3 financial statements are GPFS. As such, Tier 3 financial statements need to provide useful financial information to users of the financial statements;
- (c) consistency with the accounting principles specified by Tier 2: Australian Accounting Standards Simplified Disclosures is desirable, but might not always be warranted, since Tier 3 reporting requirements are being developed as a proportionate response to the costs incurred by certain entities while still meeting the needs of users of the financial statements for this cohort of entities. For example, opportunities for departure from Tier 2 accounting principles that could give a similar outcome to users of the financial statements while reflecting an appropriate cost/benefit balance could include disclosure requirements instead of a Tier 2 measurement requirement or an approach of specifying minimum 'prescriptive' disclosures;
- (d) where possible, leverage the information management uses to make decisions about the entity's operations. The ability to leverage information management uses is made within the context of the Board's conceptual framework relevant to NFP entities and user needs and cost/benefit considerations, and the objective of Tier 3 reporting requirements fostering comparability of information across entities that apply them; and
- (e) developing reporting requirements that do not impose disproportionate costs for preparers when compared to the benefits of that information for users of financial statements.
- BC9 The Board also decided, to the extent consistent with the principles for developing the Tier 3 R&M requirements noted in paragraph BC8, the following approach to developing Tier 3 disclosure requirements:
 - (a) for transactions and other events where there is an R&M difference between Tier 3 and Tier 1 or Tier 2 reporting requirements, Tier 3 reporting requirements will:
 - (i) adopt appropriate disclosure requirements from other jurisdictions or frameworks with comparable R&M requirements; or
 - (ii) develop fit-for-purpose disclosure requirements (eg using the existing disclosure requirements for topics whose requirements could be analogised to the Tier 3 topics as a base to develop fit-for-purpose Tier 3 disclosures) if there are no comparable R&M requirements in other jurisdictions or frameworks; and
 - (b) for transactions where the Tier 3 R&M requirements are the same or similar to the corresponding Tier 2 R&M requirements, disclosure requirements in AASB 1060 will be used as a starting point, with further consideration of simplification that may be appropriate.

The Board also considered that, except for transactions or other events with differences from Tier 2 R&M requirements noted in paragraph BC9(a), the disclosure requirements in AASB 1060 should act as the point of reference for possible Tier 3 disclosure requirements to ensure internal integrity and consistency of Tier 3 reporting requirements.

- BC10 In considering the proposed Tier 3 reporting requirements, the Board had regard to the reporting requirements applying to smaller NFP private sector entities in several other jurisdictions. The selected other jurisdictions were considered based on the international pronouncements compared in the AASB Staff Paper Comparison of Standards for Smaller Entities that were reviewed in AASB Research Report No. 5 Financial Reporting Requirements Applicable to Charities (October 2017) to evaluate the different approaches that already exist for particular areas of financial reporting for the purpose of developing the Tier 3 reporting requirements.
- BC11 The Board also considered the requirements in other jurisdictions and frameworks and the degree of their consistency with Tier 2 requirements, primarily in the *IFRS for SMEs*, complemented by the International Non-Profit Accounting Guidance (INPAG) proposals and the New Zealand Tier 3 (NFP) Standard *Reporting Requirements for Tier 3 Not-for-Profit Entities*. These frameworks were considered, to the extent consistent with the project objective and in line with the Board's agreed principles in developing the Tier 3 reporting requirements, for the purpose of developing simplified and proportionate requirements for smaller NFP private sector entities.
- BC12 The Board was also informed by Research Report No. 19 Common Financial Statement Items: Charities with \$0.5–\$3 million in revenue (April 2023), which analysed 260 financial statements of ACNC-registered charities with annual revenue ranging from \$0.5 million to \$3 million to identify the financial statement line items that are commonly recorded in financial statements of medium-sized charities.
- BC13 Considering the limited resources of smaller NFP private sector entities, the Board developed an online survey to maximise its outreach in conjunction with virtual and in-person outreach sessions. That phase of the Board's

consultation ended in March 2023; the Board received 263 responses from online surveys and 14 written submissions, and conducted several outreach events attended by over 280 attendees.

BC14 After consideration of the feedback on the DP, based on the broad support from stakeholders, the Board decided to proceed with the development of an ED of a Tier 3 Standard with simplified recognition, measurement and disclosure requirements applicable to smaller NFP private sector entities without public accountability that are not prohibited from applying Tier 3 reporting requirements by the relevant legislation, constituting document or other document (referred to as Tier 3 entities).

Significant decisions made by the Board in developing the Exposure Draft

- BC15 When developing the proposals in this ED, where most stakeholders agreed with the Board's preliminary views in the DP, the ED proposals are largely based on the preliminary views in the DP. Where the Board had not yet decided on some particular aspects of the Tier 3 reporting requirements, or stakeholders expressed mixed views on some aspects of the Board's preliminary views, the Board deliberated further whether to proceed with, or apply an alternative approach to, the Board's preliminary views in the DP.
- BC16 The Board decided, based on overall support from stakeholders, to proceed with the ED proposals based on the following preliminary views in the DP, with further simplifications where applicable:
 - (a) not develop proposals for reporting service performance information;
 - (b) not develop a fourth tier of accounting for NFP private sector entities;
 - (c) not incorporate any consequential amendments to existing requirements specified in Tier 1 and Tier 2 AAS, as presently modified for NFP private sector entities;
 - (d) retain current Tier 2 reporting requirements, except for simplifying the expression and disclosures, for:
 - (i) inventory; in addition, permit, but not require, the allocation of production overheads to inventories' cost of conversion, with the election required to be applied to all inventories produced by the entity;
 - (ii) property, plant and equipment and investment property, with simplified requirements for non-financial assets acquired for significantly less than fair value (see paragraphs BC108–BC112) and impairment of non-financial assets (see paragraphs BC113–BC118). In addition, permit, but not require, the allocation of depreciation or amortisation charges on other assets to the cost of constructing self-constructed items of property, plant and equipment and investment properties;
 - (iii) volunteer services;
 - (iv) going concern;
 - (v) offsetting of assets and liabilities; and
 - (e) provisions, contingent assets, contingent liabilities and guarantees and firm commitments; expense all borrowing costs as they accrue;
 - (f) translate foreign currency transactions using the rate at the transaction date, or at the end of the reporting period for monetary assets and liabilities; and
 - (g) base tax expenses on income tax payable, without any allowance for deferred tax assets or deferred tax liabilities.

The Board further deliberated on its preliminary views in the DP in deciding its proposals for this ED on the matters outlined in paragraphs BC17–BC137.

Stand-alone Standard

BC17 A key consideration for the Board in forming its view to develop a third proposed reporting tier was the ease of use and understandability of the reporting requirements for stakeholders, resulting in the aim to present Tier 3 reporting requirements in a stand-alone accounting standard specifying reporting requirements relevant to transactions, other events and conditions that are common to a Tier 3 entity. However, the Board recognised that a stand-alone standard containing Tier 3 reporting requirements cannot address the whole breadth of transactions, other events and conditions addressed by Tier 1 and Tier 2 AAS. To do so might clutter the Tier 3 Standard with requirements irrelevant to many Tier 3 entities. In that regard, the Board decided that the Tier 3 Standard should:

- (a) scope out certain types of transactions, other events and conditions that are uncommon to Tier 3 entities. For these scoped-out transactions, other events and conditions, the Board's preliminary view was to direct entities to follow the Tier 2 reporting requirements; and
- (b) provide entities with direction to develop an appropriate accounting policy for transactions, other events and conditions for which the Tier 3 reporting requirements do not provide guidance.

Topics scoped out from the Tier 3 Standard

- BC18 The Board did not express a preliminary view in the DP on the types of transactions, other events and conditions that might be scoped out of the Tier 3 Standard. However, from its initial outreach and consideration of pronouncements of other jurisdictions noted in paragraph BC10, the Board considered the types of transactions, other events and conditions scoped out, for which entities applying the Tier 3 Standard would be required to apply the Tier 2 requirements, would be either:
 - (a) uncommon for Tier 3 entities; or
 - (b) complex transactions warranting the application of requirements specified by existing Australian Accounting Standards.
- BC19 As such, the Board outlined in the DP the following possible accounting topics that it might not specifically address in the Tier 3 Standard:
 - (a) business combinations;
 - (b) share-based payments;
 - (c) insurance contracts;
 - (d) exploration for and evaluation of mineral resources;
 - (e) financial assets and financial liabilities that are identified as 'more complex' financial instruments in Section 10: *Financial Instruments* of this ED;
 - (f) employee benefits in relation to obligations arising under a defined benefit plan; and
 - (g) service concession arrangements.
- BC20 The Board did not express a preliminary view on whether intangible assets should also be scoped out of the Tier 3 Standard and, to inform its decision about that issue, decided to seek feedback from stakeholders on the extent of use and the types of intangible assets held by Tier 3 entities.
- BC21 Overall, stakeholders were supportive of the Board's preliminary view that entities should apply the classification, recognition, measurement and disclosure requirements specified by Tier 2: Australian Accounting Standards Simplified Disclosures for topics in paragraph BC19. However, some stakeholders were concerned about the complexity of requiring Tier 3 entities to apply the Tier 2 requirements for certain topics and therefore disagreed with scoping the following topics out of the Tier 3 Standard:
 - (a) business combinations: stakeholders considered it would not be uncommon for Tier 3 entities to be involved in a merger or acquisition; and
 - (b) biological assets, service concession arrangements and financial instruments identified as 'more complex financial instruments', even though each of these might be uncommon transactions for Tier 3 entities.
- BC22 Some stakeholders had mixed views on whether intangible assets are commonly held by Tier 3 entities. Some stakeholders identified that Tier 3 entities sometimes hold intangible assets such as software, goodwill or trademarks and encouraged the Board to develop Tier 3 reporting requirements for intangible assets. However, some stakeholders considered that Tier 3 entities held no intangible assets and that accounting for intangible assets was not a significant issue for most Tier 3 entities.
- BC23 The Board considered the feedback received and decided to propose in the ED, consistently with its preliminary view in the DP (except for business combinations and service concession arrangements), to keep the design of the Tier 3 Standard outlined in paragraph BC19. The Board was also informed by Research Report No. 19 that some charities reported goodwill and other intangible assets in their financial statements, even though doing so might be uncommon, and decided to develop requirements to address business combinations and intangible assets in the Tier 3 Standard. While private sector operators would be required to apply AASB Interpretation 12 Service Concession Arrangements to account for their service concession arrangements, it is likely to be an uncommon transaction for a Tier 3 entity. Therefore, the Board decided to exclude reference to service concession arrangements from the list of transactions for which an entity would be directed to apply the Tier 2 requirements. The Board noted that an entity may still refer to any Tier 2 reporting requirements (eg AASB Interpretations) in the absence of explicit guidance in the Tier 3 Standard as noted in paragraph BC28.

BC24 The Board reconfirmed its preliminary view not to develop any specific Tier 3 reporting requirements for property, plant and other non-current assets that an entity intends to sell rather than hold for continuing use because the Board expects such events to be infrequent. Therefore, the Board decided to also scope out non-current assets held for sale and discontinued operations from the Tier 3 Standard.

Application of accounting policies in the absence of explicit guidance in the Tier 3 Standard

- BC25 The Board expressed a preliminary view in the DP the following directions an entity would need to follow in developing an appropriate accounting policy when the Tier 3 reporting requirements do not provide guidance:
 - (a) first apply the classification, recognition, measurement and disclosure requirements specified by Tier 2: Australian Accounting Standards Simplified Disclosures; and
 - (b) otherwise, apply judgement in developing an accounting policy by reference to the following sources in descending order:
 - (i) the principles and requirements in the Tier 3 Standard dealing with similar and related issues; and
 - (ii) the definitions, recognition criteria and measurement concepts for assets, liabilities, income and expenses in the Australian conceptual framework relevant to NFP entities, to the extent they do not conflict with Tier 3 reporting requirements.
- BC26 In forming its views, the Board considered it would be easier for Tier 3 entities to be directed to first apply the existing Tier 2 requirements than to be required to apply judgement in developing their own accounting policy to account for transactions, other events and conditions scoped out of the Tier 3 reporting requirements. In addition, referring entities directly to Tier 2 requirements would enhance comparability amongst Tier 3 entities and across tiers.
- BC27 While stakeholders generally agreed with the proposed approach in paragraph BC25 to apply to topics scoped out of, or not the subject of guidance in, the Tier 3 Standard, some stakeholders expressed concerns about directing entities to first apply Tier 2 requirements because they considered a stand-alone standard should avoid the need for an entity to apply Tier 2 requirements. Instead, stakeholders considered an entity should be allowed to develop an accounting policy by first referring to the principles and requirements in the Tier 3 Standard dealing with similar or related issues.
- BC28 In response to the stakeholders' concerns, the Board decided to confirm its aim of developing a stand-alone standard and propose in the ED that entities can apply judgement in developing their accounting policies by first referring to the Tier 3 reporting requirements and principles dealing with similar or related issues in respect of transactions, other events and conditions not specifically addressed in the Tier 3 Standard. In making this judgement, management may also consider Tier 2 requirements and guidance. The Board reconfirmed its decision and proposed in the ED to require entities to apply the Tier 2 requirements directly for topics scoped out of the Tier 3 Standard.

Applying an accounting policy permitted or required by Tier 1 or Tier 2 Australian Accounting Standards

- BC29 Through its initial outreach, the Board was informed that some Tier 3 entities might already comply with several or all of the accounting policies prescribed by Tier 2 AAS and these entities may want to continue their existing policies. Notwithstanding that a Tier 3 entity may still elect to prepare Tier 1 or Tier 2 compliant financial statements, the Board considered whether it should develop requirements that would permit an entity preparing Tier 3 GPFS to apply an R&M policy permitted or required by Tier 1 or Tier 2 AAS. In that regard, the Board decided to seek feedback on the application of an accounting policy permitted or required by Tier 1 or Tier 2 AAS, specifically, whether to:
 - (a) allow an entity a free choice for a transaction, other event or condition within the scope of the Tier 3 Standard;
 - (b) develop requirements that would allow an entity to only apply Tier 1 or Tier 2 AAS on a policy-bypolicy basis for topics specified by the Board; or
 - (c) restrict the range of accounting policies to only those specified by the Tier 3 Standard for transactions or other events within the scope of the Tier 3 Standard.
- BC30 Stakeholders expressed mixed views on the options presented in paragraph BC29. On one hand, some stakeholders considered that allowing an entity a free choice to apply an accounting policy in Tier 1 or Tier 2 AAS would provide flexibility and enable the entity to provide more appropriate information to users that reflects the nature and complexity of the transaction or other event. However, some stakeholders did not

support allowing a free choice because it would create inconsistencies and a lack of comparability, and may lead back to issues similar to those arising under the SPFS regime.

BC31 After considering the feedback, the Board decided to propose in the ED to allow entities to apply an accounting policy permitted or required by Tier 1 or Tier 2 AAS that is not included in the Tier 3 Standard only where a transaction, other event or condition is not addressed by the Tier 3 Standard.

Primary financial statements

BC32 Regarding what should form a Tier 3 entity's primary financial statements, in line with principles applied in developing Tier 3 reporting requirements, including the desirability of maximising consistency with Tier 2 accounting principles where possible (consistent with the principle in developing the Tier 3 reporting requirements noted in paragraph BC8(c)), the Board decided to consider the requirements for the presentation of financial statements set out in AASB 1060 *General Purpose Financial Statements — Simplified Disclosures for For-Profit and Not-for-Profit Entities* as the starting point, with further simplification. The Board considered it is generally accepted that some form of statements about the entity's financial result for the period and financial position, including notes, must be presented because they provide crucial financial information about the entity to the users of its GPFS. However, the Board observed there is less consensus about the usefulness of the level of detail and location of the information about other comprehensive income, changes in the entity's equity or accumulated funds and cash flows for Tier 3 entities. As such, the Board decided to consider possible simplification approaches for the statement of comprehensive income, statement of changes in equity and the statement of cash flows.

Statement of profit or loss and other comprehensive income (Statement of comprehensive income)

- BC33 In its initial outreach, the Board heard that users of financial statements might not fully understand that items of other comprehensive income often are unrealised gains and losses. Also, users might be less informed that these gains or losses may or may not be reclassified to profit or loss. As an alternative to requiring some items to be classified as 'other comprehensive income', the Board discussed whether simply requiring a statement of profit or loss would be a proportionate response for Tier 3 financial statements. However, the Board considered that the benefits of providing more complete and transparent information about the entity's performance would outweigh the cost of providing such information (which should be reduced by further education about the nature of the balances reported). As such, the Board formed a preliminary view that a statement of profit or loss and other comprehensive income remains useful and therefore should be required for Tier 3 GPFS without imposing significant costs on preparers.
- BC34 Most stakeholders supported extending to Tier 3 entities the requirement in AASB 1060 to present a statement of profit or loss and other comprehensive income. However, some stakeholders disagreed and considered a two-statement approach should be adopted to separately present a statement of profit or loss from a statement of comprehensive income (which would be presented only if an entity incurred items of other comprehensive income). Otherwise, a statement of other comprehensive income should not be required as part of the Tier 3 primary financial statements.
- BC35 The Board considered the feedback received and decided, consistent with its preliminary view in the DP, to propose in the ED requiring a statement of other comprehensive income as part of Tier 3 primary financial statements. This is consistent with several decisions the Board made that would result in the recognition of items of other comprehensive income, for example, in Section 15: *Property, Plant and Equipment* when recognising revaluation gains or losses, or when an entity makes an irrevocable election on initial recognition to recognise changes in fair value through other comprehensive income for a class of instruments in accordance with Section 10: *Financial Instruments*. The Board also decided to propose, consistent with its preliminary view, to align the presentation requirements with Tier 2 principles. This would allow an entity to present a single statement of profit or loss and other comprehensive income or a separate statement of profit of loss and a separate statement of comprehensive income, including presenting a statement of comprehensive income in which the bottom line is labelled 'profit or loss' if the entity has no items of other comprehensive income.
- BC36 Some stakeholders considered the need for more direct requirements and guidance on when to aggregate or disaggregate information on the face of the statement of profit or loss and other comprehensive income. However, the Board decided, based on the support from the majority of feedback on the preliminary views in the DP, that aligning the presentation requirements with AASB 1060, supported by explanatory guidance or examples:
 - (a) would better invite the entity to use the financial statements to 'tell their story';

- (b) would allow management to determine the level of aggregation or disaggregation of line items presented on the face of the financial statements based on the needs of the entity's users; and
- (c) may be able to educate preparers and accommodate a growing entity with increasingly sophisticated users, rather than catering only to existing accounting literacy.

Statement of changes in equity

- BC37 From its initial outreach, the Board heard the statement of changes in equity might help users assess the integrity of the financial statements and would provide important information about the effects of adjustments to equity resulting from changes in accounting policies and corrections of errors. However, the Board noted that for many Tier 3 entities, the change in equity might be only the profit or loss for the reporting period. As such, the Board considered an alternative presentation of disclosing changes in equity other than profit or loss in the notes to the financial statements might be sufficient to meet users' needs. Noting the differing perspectives, the Board decided to seek stakeholder views in the DP on whether a statement of changes in equity should be required as part of the specified Tier 3 primary financial statements or to provide an alternative presentation requiring the information to be disclosed in the notes to the financial statements.
- BC38 Stakeholders expressed mixed views on whether a statement of changes in equity should be required. Stakeholders that supported requiring a statement of changes in equity considered the information about changes in an entity's reserves (if any) important in addition to identifying changes in accounting policies and corrections of errors. Stakeholders that did not support requiring a statement of changes in equity considered that, for many Tier 3 entities, the only movement in equity for the reporting period would be their profit or loss, and therefore considered the statement does not add value to users. Only some stakeholders considered the information required in the statement of changes in equity should be disclosed in the notes if that statement is not required.
- BC39 The Board considered the feedback received and decided to propose in the ED to align the requirement for the statement of changes in equity with AASB 1060 where an entity would be required to prepare a statement of changes in equity only in certain circumstances specified in Section 5: Statement of Changes in Equity and Statement of Income and Retained Earnings; otherwise, a statement of income and retained earnings may be prepared instead.

Statement of cash flows

- BC40 The Board expressed a preliminary view in the DP to require the statement of cash flows to present cash flows from operating activities separately without requiring cash flows from investing activities to be distinguished from cash flows from financing activities. The Board also expressed a preliminary view to require cash flows from operating activities to be presented using the direct method only, instead of allowing an accounting policy choice for an entity to apply the indirect method.
- BC41 In developing its preliminary views, the Board considered that the benefits of retaining the Tier 2 reporting requirement to present separately cash flows from investing and financing activities might be limited because, without that requirement, each major class of gross cash receipts and gross cash payments would remain separately disclosed. Not requiring the distinction reduces an element of judgement from the preparation of the financial statements and reduces potential confusion among preparers and users. Allowing only the direct method to present cash flows from operating activities would remove the need to disclose a reconciliation of the net cash flows from operating activities to the profit or loss in the notes to the financial statements.
- BC42 The Board also considered whether to limit the statement of cash flows to reporting solely on cash and overdrafts instead of capturing cash and cash equivalents as required by Tier 2 requirements. Ultimately, the Board decided that cash equivalents are an important element because they are largely similar to cash; therefore, reflecting them in the statement of cash flows is necessary to demonstrate stewardship of an entity's resources as well as maintaining consistency with Tier 1 and Tier 2 statement of cash flows requirements.
- BC43 While most stakeholders supported the Board's preliminary view for the presentation requirements of the statement of cash flows noted in paragraph BC40, some stakeholders considered not separately presenting investing from financing activities in the statement of cash flows might reduce users' ability to evaluate the sources of funds and their use. They also noted that existing accounting software already enables an entity to present separately cash flows from investing and financing activities. The Board also heard that both the direct and indirect methods to presenting cash flows from operating activities should continue to be permitted in the Tier 3 Standard, consistent with the findings in Research Report No. 19 that most Tier 3 entities apply both the direct and indirect methods.
- BC44 After considering the feedback, the Board decided to propose in this ED to permit but not require cash flows from investing activities to be presented separately from cash flows from financing activities. The Board also decided to continue from Tier 2 reporting requirements permitting cash flows from operating activities to be

presented using either the direct or indirect method to minimise transition costs. However, to provide some simplification for Tier 3 entities, the Board decided not to require entities applying the direct method to disclose a reconciliation of net cash flows from operating activities to the profit or loss.

Consolidated and separate financial statements

Choice whether to prepare consolidated financial statements

- BC45 In relation to the Tier 2 requirement in AASB 10 *Consolidated Financial Statements* for entities to prepare consolidated financial statements if they have subsidiaries (ie entities they control), the Board was informed through previous stakeholder outreach about challenges and costs in identifying a complete set of subsidiaries of Tier 3 entities, because of:
 - (a) information not being readily available to those entities; and
 - (b) a stakeholder view that consolidated financial statements do not provide useful information compared with entity-level financial statements for each entity in a group, sometimes because of disagreement that some entities identified as subsidiaries are actually controlled by the reporting entity; and
 - (c) proportionately greater costs likely to be incurred by Tier 3 entities in preparing consolidated financial statements.
- BC46 In addition, the Board received feedback that avoiding consolidation might be a reason some entities presently elect to prepare special purpose financial statements. In response to the feedback referred to in paragraph BC45, the Board concluded that the costs of requiring (with or without limited exceptions) the preparation of consolidated financial statements by Tier 3 parent entities are likely to exceed the benefits to users of financial statements of those parent entities. Therefore, the Board expressed in its DP a preliminary view to provide an option to Tier 3 parent entities to present either:
 - (a) consolidated financial statements; or
 - (b) separate financial statements as their only set of financial statements, with disclosures about each parent entity's significant/notable relationships ('notable relationships').

The Board decided not to develop additional guidance on identifying control, because such guidance would not necessarily reduce the complexity of assessing whether control relationships exist and might have unintended implications for Tier 2 NFP entities applying AASB 10. The Board considers that implementation concerns about the guidance on control in AASB 10 affect NFP entities of all sizes, and plans to consider those concerns as part of its post-implementation review of the application guidance for NFP entities in AASB 10, rather than in its project to develop a Standard for Tier 3 entities.

- BC47 Overall, the stakeholder feedback supported the Board's preliminary view on consolidation in paragraph BC46. However, some stakeholders disagreed, even if additional compensating disclosures were required. They expressed a view that, to be of a 'general purpose' nature, a parent entity's financial statements need to recognise all assets the entity controls and all liabilities it incurs (directly, or indirectly through subsidiaries), and changes in those assets and liabilities. They also expressed views that:
 - (a) preparing consolidated financial statements is important in providing transparent information to users of a parent entity's financial statements about the resources available to, the financial risk associated with, and the funding provided to, the reporting entity as a whole; and
 - (b) providing an accounting policy choice about whether to prepare consolidated financial statements might undermine the comparability between financial statements of similar groups of Tier 3 entities.
- BC48 The Board considered the feedback received and decided to propose in the ED a policy consistent with its preliminary view in the DP because:
 - (a) it is generally expected that few Tier 3 entities would be parent entities;
 - (b) separate financial statements, supplemented by disclosures of key information about notable relationship entities, can provide useful information about the reporting entity and its notable relationships without requiring assessments of whether control exists and requiring all the information necessary for the preparation of consolidated financial statements. Requiring disclosure of information about the identity of 'notable relationship entities' (see paragraphs BC49–BC52) should enable users of the financial statements of Tier 3 entities to obtain GPFS, if available, of those notable relationship entities; and
 - (c) exceptions to preparing consolidated financial statements exist in AASB 10 (eg in respect of investment entities); where exceptions are utilised, the financial statements nevertheless are referred to as GPFS.

Disclosures about notable relationships

- BC49 As noted in paragraphs BC46 and BC48, the Board proposes requiring disclosures of information about notable relationships in separate financial statements (but not if the reporting entity presents consolidated financial statements). This ED's proposed definition of a 'notable relationship entity' is an entity:
 - (a) over which the parent entity has at least significant influence (ie it would also include any instances of control or joint control, without requiring identification of whether the relationship is one of control, joint control or just significant influence); but
 - (b) that is not identified as an associate. Disclosure requirements for associates are specified separately in Section 13: *Investments in Associates and Joint Arrangements*.
- BC50 Defining a 'notable relationship entity' as an entity over which the parent entity has at least significant influence responds to feedback from previous outreach with stakeholders, who indicated few concerns with identifying relationships of significant influence although identifying control relationships has been problematic (eg stakeholder feedback suggested it might often be straightforward to determine whether a church has significant influence over a religious school but highly problematic to determine whether the church controls the school).
- BC51 The Board proposes to require disclosure of the name of the entities with which the reporting entity has a notable relationship and a description of those relationships, together with other descriptive (non-quantitative) information. The Board considered whether to also propose requiring disclosure of key metrics about notable relationship entities, such as their total assets. The Board concluded that making such disclosures would be likely to reduce considerably the cost savings ensuing when a parent entity elects not to prepare consolidated financial statements in respect of its subsidiaries. This is because:
 - (a) the range of notable relationship entities that are the subject of the disclosures would be broader than controlled entities (because they include all entities over which the entity has at least significant influence); and
 - (b) requiring disclosure of key metrics might prove almost as costly as requiring consolidated financial statements (ie the cost savings from having to disclose only key metrics would pertain mainly to cost savings relating to disaggregating and presenting information, without reducing the cost of record-keeping and calculating financial statement elements of controlled entities).
- BC52 Therefore, the Board is not proposing to require disclosure of key metrics about notable relationship entities.

Measurement basis subsequent to initial recording for interests in notable relationship entities reported in separate financial statements

- BC53 The Board expressed a preliminary view in the DP that a parent entity that presents separate financial statements should have the choice of measuring, subsequent to initial recording, its interests in subsidiaries at any of:
 - (a) cost;
 - (b) fair value through other comprehensive income; or
 - (c) their equity method-based amounts.
- BC54 Overall, stakeholder feedback supported the Board's preliminary view. Some stakeholders expressed concern that too many measurement choices are provided, which might reduce the consistency of subsequent measurement; some others argued that investments in subsidiaries should be measured only at cost in separate financial statements of the parent. Regarding consistency of measurement, the Board noted in the DP that:
 - (a) it expects that Tier 3 entities presenting separate financial statements will, in the main, measure any interests in subsidiaries at cost;
 - (b) permitting a parent entity to measure its interests in subsidiaries at fair value through other comprehensive income in its separate financial statements should promote consistency of measurement by treating those interests in the same manner as the treatment under the Board's preliminary views regarding financial assets held to generate both income and a capital return for the entity (note that, under the Board's proposals in the ED regarding the subsequent measurement of financial instruments in paragraph BC69, an entity could make an irrevocable election at initial recording of the first asset in such a class of financial assets to measure the class at fair value through other comprehensive income). This measurement basis could provide relevant information where the entity determines the substance of its interests in its subsidiaries is a financial investment, ie a financial asset held to generate both income and a capital return for the entity;

- (c) where a parent determines that the substance of its interests in its subsidiaries is more akin to that of an associate interest, despite the entity controlling those subsidiaries, permitting the parent entity to measure its interests in subsidiaries using the equity method in its separate financial statements would allow the parent entity to measure its interests in subsidiaries consistently with its investments in associates (for which, under the Board's preliminary view in the DP, reaffirmed in its corresponding proposal in the ED, application of the equity method would be required in consolidated financial statements, if prepared); and
- (d) restricting the accounting policy choice for subsequent measurement of interests in subsidiaries in separate financial statements might impose a stricter requirement than that currently imposed under Tier 2 reporting requirements, which allow a choice for a parent entity to select the measurement basis for its interests in subsidiaries in separate financial statements.
- BC55 The Board extended the scope of the preliminary view regarding measurement requirements in paragraph BC53 to encompass interests in any notable relationship entities reported in separate financial statements. In addition, the Board decided to propose that interests in notable relationship entities should, if not measured at cost or using the equity method of accounting, be measured at fair value through profit or loss unless the entity makes an irrevocable election at initial recording of a particular investment to present changes in its fair value in other comprehensive income. This option is consistent with the Board's proposed subsequent measurement basis for financial assets acquired or originated by the entity to generate both income and a capital return for it (including all investments in equity instruments). The proposed option to make an irrevocable election at initial recording regarding the presentation of subsequent changes in fair value (ie through other comprehensive income, rather than profit or loss):
 - (a) responds to concerns about both the potential volatility of fair changes affecting the reported profit or loss and the unfamiliarity of some users of financial statements of Tier 3 entities with the concept of other comprehensive income;
 - (b) has a precedent in AASB 9 *Financial Instruments*, paragraphs 4.1.4 and 5.7.5 of which provide an option to make an irrevocable election at initial recording to measure financial assets meeting particular criteria at fair value through other comprehensive income instead of fair value through profit or loss; and
 - (c) would apply consistently to all interests in a single class of interests (interests in subsidiaries, associates or jointly controlled entities) and therefore, in effect, would be made on initial recording of the first interest in a class, subject to the transitional provisions for initial application of this Standard (see paragraph 29.11(e)).
- BC56 The proposed measurement requirements for a parent entity's investments in associates and joint ventures included in its consolidated financial statements (if any) are specified in Section 13: *Investments in Associates and Joint Arrangements*, rather than in Section 8: *Notable Relationships and Consolidated and Separate Financial Statements*.

Accounting policies, estimates and errors

BC57 The Board considered that an entity preparing Tier 3 GPFS should be able to voluntarily change any accounting policy to another permitted policy, provided the change results in the financial statements providing reliable and more relevant information about the effects of transactions, other events or conditions on the entity's financial position, performance or cash flows, which is consistent with AASB 108 Accounting Policies, Changes in Accounting Estimates and Errors. The Board expressed a preliminary view in the DP to require a modified retrospective approach for changes in accounting policies. That approach distinguishes the cumulative effects of transactions and other events in prior periods from the effect of transactions and other events occurring in the current period, but without requiring restatement of comparative information reported in respect of each prior period presented. The Board considered this approach would strike an appropriate cost-benefit balance for Tier 3 entities and is compatible with AASB 108, which caters for a modified retrospective approach in transitional provisions of various new and amended Standards. The Board recognises that comparative financial information would not be restated and some comparability would be sacrificed under its proposal. However, the Board considered the benefits of restating comparative information presented for prior periods might not exceed the related costs since these adjustments are generally one-off in nature and users of Tier 3 entity financial statements might not regard such restatements as crucial. The Board also decided to develop similar requirements for a modified retrospective approach to apply to corrections of prior period accounting errors. For changes in accounting estimates, the Board does not propose to depart from AASB 108, which requires prospective application of changes in accounting estimates, because the Board did not identify any reasons to develop different requirements for Tier 3 entities through previous stakeholder outreach.

- BC58 As an alternative to the approach described in paragraph BC57, the Board considered whether to permit Tier 3 entities to account prospectively for voluntary changes its accounting policies or to correct prior period errors. However, the Board was concerned that applying a prospective approach could misrepresent the current period's results, and might affect the entity's financing covenants or inadvertently change the extent of the entity's reporting obligations through a one-off change to the entity's revenues or expenses.
- BC59 Overall, the stakeholder feedback supported the Board's preliminary view described in paragraph BC57 to apply a modified retrospective approach to account for changes in accounting policies and corrections of prior period errors and a prospective approach for changes in accounting estimates. However, some stakeholders disagreed with applying a modified retrospective approach to account for prior period errors. They expressed a view that not requiring restatement of comparative information for known prior period errors would:
 - (a) mislead users and obscure the current year operations in some situations, and might create opportunities for management to manipulate financial reporting; and
 - (b) cause concerns about whether financial statements would provide a true and fair view if the comparative information contains a material known error, with implications for an auditor's ability to express an unqualified opinion on the financial statements.
- BC60 The Board considered the feedback received and decided to retain its DP preliminary view in the proposed requirements in the ED because:
 - (a) under its proposals, the amounts of revenues and expenses reported for the current period would exclude, and therefore not be distorted by, the cumulative effects of prior period errors;
 - (b) the Board's proposal would not permit an identified prior period error to remain uncorrected or be undisclosed instead, it would limit the required restatements to the affected opening balances for the current period;
 - (c) an auditor would provide assurance against the information presented in accordance with the applicable financial reporting framework, and where such a framework permits the financial statements to be prepared in accordance with this Standard, it includes the simplification of not requiring comparative information to be restated for corrections of prior period errors. The Board also noted that similar audit considerations arose upon the removal of special purpose financial statements for certain for-profit private sector entities, where the Board, through the issue of AASB 2020-2 Amendments to Australian Accounting Standards Removal of Special Purpose Financial Statements for Certain For-Profit Private Sector Entities, allowed entities that prepared special purpose financial statements not to restate comparative information when adopting Tier 2 requirements early; and
 - (d) a similar approach was adopted in the New Zealand Tier 3 Standard and the Board is not aware of adverse feedback received during that Standard's post-implementation review in relation to applying a modified retrospective approach to the correction of prior period errors.
- BC61 However, in response to the concerns expressed by these stakeholders, the Board decided to propose a disclosure requirement to signal to users that a modified retrospective approach has been applied to account for changes in accounting policies and corrections of prior period errors and that the adjustments to the opening balances for the current period are not reflected in the comparative information presented for prior periods.
- BC62 The Board also noted that it might be more onerous if the 'impracticable' exemption in AASB 108 was not included in the Tier 3 Standard, notwithstanding the proposed simplification of applying a modified retrospective approach to changes in accounting policies and corrections of prior period errors. Under that exemption in AASB 108, if it is impracticable for an entity applying Tier 1 or Tier 2 reporting requirements to determine the period-specific effects of changing an accounting policy or correcting a prior period error on comparative information for one or more prior periods presented, the entity would apply the new accounting policy or correct the prior period error prospectively from the beginning of the earliest period for which retrospective application of the new accounting policy, or retrospective restatement of prior period amounts to correct the error, is practicable. To respond to the possibility that it might be impracticable for a Tier 3 entity applying the modified retrospective approach to a new accounting policy or a prior period error by recording all prior period effects on the opening balances of assets, liabilities and equity for the period in which the accounting policy is changed or the prior period error is corrected, the Board decided to propose a similar 'impracticable' exemption for Tier 3 entities. Under that proposed exemption, the Tier 3 entity would adjust the opening balances of assets, liabilities and equity to apply the new accounting policy or correct the prior period error prospectively from the earliest date practicable.
- BC63 For cost-benefit reasons, the Board proposed further simplifications of the Tier 2 disclosure requirements, including not requiring Tier 3 entities to determine whether a change in accounting policy might have an effect on future periods, including disclosure of the estimated current period effects of that change.

Financial instruments

BC64 The Board was informed through previous outreach that many stakeholders regard AASB 9 *Financial Instruments* to be a complex accounting standard. This view is consistent with the wide breadth of that Standard's scope, being to provide useful information to users of the financial statements of financial instruments held by financial institutions and non-financial institutions, financial instruments held by startups and other simple businesses and those held by entities employing more complex financial management strategies. Hence, the Board considered it is necessary to develop simpler reporting requirements for financial instruments compared to those specified by Tier 2 reporting requirements.

Scope

BC65 The Board expressed preliminary views in the DP that the future Tier 3 Standard should identify the basic financial instruments that a Tier 3 entity might typically hold, for which simpler requirements will apply. The Board's preliminary view in the DP was to require application of respective AAS to particular more complex financial instruments. The feedback from stakeholders on the DP supported the notion of distinguishing between financial instruments specifically in the scope of this Standard and those that are not. After considering the feedback, the Board decided to propose including the basic or commonly held financial instruments listed in paragraph 10.2 in Section 10: Financial Instruments in the scope of this Standard and to propose a requirement to apply Tier 2 requirements to more complex financial instruments and financial instruments not commonly held by Tier 3 entities, such as those listed in paragraph 10.3 in Section 10. The Board also decided to propose that entities applying this Standard are not permitted to apply hedge accounting. The alternative the Board considered and rejected was to determine the financial instruments in the scope of this Standard on the basis of whether an instrument contains potentially complex features (for example, a derivative). However, the Board considered this alternative would be unnecessarily complex and that it is more important to provide clarity in the simplest way possible, given the relatively limited complexity and breadth of the financial instruments expected to be commonly held by entities applying this Standard.

Recognition and derecognition

BC66 In absence of specific concerns about the application of the financial instruments recognition requirements pertaining to Tier 3 entities, the Board decided to propose, consistently with the principles of AASB 9, that the instruments in the scope of this Standard will be recognised when the entity becomes party to the contractual provisions of the financial instrument. However, in relation to derecognition of financial assets and financial liabilities, in its aim to simply the requirements, the Board decided to propose some differences from AASB 9. Following the support from stakeholders for the Board's preliminary view in the DP, the Board decided to propose to require that a financial asset is derecognised only when either the contractual rights to the cash flows from that asset expire or are settled, or the entity otherwise loses control of that asset. This is to address concerns regarding the difficulty of assessing pass-through transactions and whether the entity retains a continuing involvement in a financial asset. Similarly, the Board proposes simpler requirements than those in AASB 9 for the derecognition of financial liabilities in the scope of this Standard by not specifying requirements for exchanges of debt instruments or the modification of the terms of an existing financial liability. Given the Board's proposals regarding the treatment of initial transaction costs, subsequent measurement and the calculation of interest expense, the effect is unlikely to differ significantly regardless of whether the transaction or other event is treated as the derecognition of the original financial liability and recognition of a new financial liability, or as an adjustment of the original financial liability.

Initial measurement

BC67 When developing its preliminary views for the DP, the Board did not find any evidence suggesting that the fair value on initial recognition of a basic financial asset or financial liability by a Tier 3 entity would typically differ from the transaction price. Therefore, the Board also decided to propose to apply fair value for the initial measurement of amounts receivable, estimated as the amount of consideration to which the entity expects to be entitled in exchange for the goods or services transferred to customers. The feedback on the DP supported the Board's preliminary view to require basic financial assets and financial liabilities to be measured at fair value on initial recognition, including the requirement for transaction costs arising from financial assets and financial liabilities to be expensed when incurred. The Board decided to propose this simplification to eliminate costs of identifying, monitoring and amortising transaction costs while being unlikely to result in any material misrepresentation of the financial instruments.

BC68 As an exception to the requirement for basic financial instruments to initially be measured at fair value, the Board decided to propose to require a concessional loan (ie a loan with a contractual interest rate significantly less than the corresponding market rate for such loan, where that lower rate was contracted principally to

enable the Tier 3 entity to further its objectives) to be measured at its transaction price on initial recognition. The Board considered that the benefits of this exception, including:

- (a) removing the need to determine an equivalent market interest rate;
- (b) the related complexity of necessarily amortising the resulting day 1 gain or loss if fair value were used at initial measurement and the Board retained its DP proposal to simplify the measurement of interest income and interest expense by requiring them to be measured using the contractual interest rate: and
- (c) its compatibility with the Board's proposal to simplify the measurement of interest income and interest expense by using the contractual interest rate,

outweigh the cost of the information lost to users of the financial statements and lack of consistency with initial measurement of other financial instruments. The Board's proposal to require a concessional loan to be measured at its transaction price on initial recognition differs from its proposals to permit initial measurement of donated investment property, property, plant and equipment and intangible assets at fair value (in accordance with paragraphs 14.6, 15.4 and 16.4, respectively) and of donated inventories at current replacement cost (in accordance with paragraph 12.8). The Board concluded that this difference is warranted by the benefits noted in (a) - (c) above, which relate to aspects (such as subsequent measurement of interest income and interest expense) that do not arise for non-financial assets.

Subsequent measurement

- BC69 The feedback from the Board's preliminary outreach and on ITC 47 Request for Comment on IASB Request for Information on Post-implementation Review of IFRS 9 Financial Instruments Classification and Measurement did not highlight stakeholder concerns with the appropriateness of the split between cost and fair value measurement bases. However, the Board observed that Tier 3 entities are less likely to hold financial assets for trading purposes, and with the aim of removing the degree of judgement required to assess the 'cashflow' test and 'business model' test under AASB 9, the Board decided to propose the requirement for financial assets that are held to generate both income and a capital return and within the scope of this Standard to be measured subsequently at fair value through profit or loss, whilst permitting an irrevocable election on initial recognition to recognise changes in fair value through other comprehensive income for a class of instruments. The availability of an irrevocable election was provided to respond to the stakeholder feedback on the DP to simultaneously maintain, at least to some extent, comparability with Tier 2 requirements while enabling various intentions of Tier 3 entities holding these financial instruments to be reflected, acknowledging the potential effect on comparability amongst entities applying this Standard.
- BC70 In recognition that measuring interest income and interest expense by reference to the contractual interest rate is more straightforward to apply compared to using the effective interest method, the Board decided to propose that financial assets arising from instruments that are basic or commonly held by Tier 3 entities are measured subsequently to initial recognition at cost less accumulated impairment losses. Similarly, the Board proposed to require all financial liabilities to be measured at cost. The Board considered and rejected proposals that 'cost' includes premiums or discounts on the acquisition of the asset or incurrence of the liability deferred because the Board considered it not sufficiently common for Tier 3 entities to warrant inclusion of guidance regarding premiums or discounts in this ED.
- BC71 The Board observed that, in some cases, the cost of shares held in an unlisted company may be an appropriate estimate of its fair value. These instances are expected to be limited, for example, when there is a wide range of possible fair value measurements and cost represents the best estimate of fair value within that range or if there are no indicators present to suggest otherwise (eg a change in the economic environment in which the entity operates), and there is insufficient more recent information available to measure fair value. Following the support from stakeholders for the Board's preliminary views in the DP, the Board decided to propose those requirements in this regard, with the aim to mitigate measurement complexities for investments in unlisted equity instruments.
- BC72 The Board observed that the impairment loss provisions in AASB 9 are unduly complex for basic financial assets held by Tier 3 entities, for which it is proposing to develop simpler financial instruments reporting requirements. Consequently, the Board decided to develop simpler Tier 3 impairment requirements for basic financial assets measured at cost. Consistent with its preliminary view on impairment of non-financial assets (see paragraphs BC113–BC118), the Board decided to propose a requirement for an impairment loss to be recognised only when it is probable that some or all of the amount owed will not be collectible. The impairment loss is to be measured at the anticipated uncollectible amount. The Board considers that one potential alternative to its proposals, being the simplified expected credit loss model in AASB 9 applying to trade receivables, would not represent a sufficiently proportionate response for Tier 3 entities, which are unlikely to have sophisticated credit risk management policies.

Disclosures

BC73 Consistent with the Board's approach described in paragraphs BC64–BC72, the Board proposed simpler disclosures compared to those required for Tier 2 entities as well as those required by the *IFRS for SMEs*, reflecting the Board's proposals regarding the R&M requirements for financial instruments.

Fair value measurement

- BC74 The Board expressed preliminary views in the DP that the future Tier 3 Standard should allow or require fair value measurements of particular financial instruments and non-financial assets (such as property, plant and equipment), and that the Tier 3 Standard should be consistent in principle with the Tier 2 framework and guidance for fair value measurements in AASB 13 Fair Value Measurement. The Board noted that this approach should avoid costs of misinterpretation and retraining that would potentially be incurred if another source of guidance on fair value measurement were specified for Tier 3 entities. Consequently, the Board expressed a preliminary view in the DP that Tier 3 entities should apply the definition of 'fair value' in AASB 13 and estimate fair value by reference to a specified hierarchy and a non-financial asset's highest and best use but expressed in a manner easier to follow for preparers who are not accounting experts.
- BC75 As an alternative to the approach described in paragraph BC74, the Board considered whether to permit Tier 3 entities to use other current value measurement bases as 'shortcuts' to estimate fair value. For example, the Board considered whether it should permit an entity to use, on a stand-alone basis, a rateable or other government valuation or the recent market selling price of a similar asset. The Board rejected such valuation 'shortcuts' because it was concerned that they might not result in measurements that represent faithfully the value of the asset held (eg rateable value calculation bases might differ between jurisdictions). In addition, the Board noted that Tier 3 entities would not be required to apply a revaluation model to their non-financial assets, which largely negates any need for valuation 'shortcuts'.
- BC76 Overall, stakeholders' feedback on the DP agreed with the Board's preliminary views. In response to a view that Tier 3 entities should be permitted to use historical cost as an approximation of fair value to reduce the cost and the potential volatility of fair value measurements, the Board concluded that, whilst historical cost might in particular circumstances (eg for some recently purchased assets) coincide closely with the amount of an asset's or a liability's fair value, deeming historical cost to represent fair value often would not result in faithful representation of fair value. In addition, Tier 3 entities would not be required to apply a revaluation model to their non-financial assets and they generally could simply elect to measure non-financial assets using the (historical) cost model.
- BC77 In light of that feedback, the Board decided to reflect its DP preliminary views in its proposals in this ED. However, the Board decided to propose further simplifications by providing a practical expedient for identifying when a higher and better use of a non-financial asset than its existing use would exist (see paragraph BC78) and excluding guidance on the fair value hierarchy (see paragraphs BC81–BC83). The Board also proposes to simplify the application of fair value measurements by including guidance specific to Tier 3 entities; the specific reasons for that proposed guidance are set out in paragraphs BC79 and BC80 and paragraphs BC84 and BC85. The Board's reason for excluding the disclosure requirements about fair value measurements in AASB 13 is set out in paragraph BC86.

Highest and best use

Practical expedient

BC78 The Tier 2 requirements in AASB 13 require the fair value measurement of a non-financial asset to be based on the asset's highest and best use (paragraph 27); that Standard also states a rebuttable presumption that an asset's current use is its highest and best use (paragraph 29). To achieve the simplification objectives of the Tier 3 Standard, the Board proposes in paragraph 11.7 of the ED guidance clarifying (and limiting) the circumstances in which the presumption that an asset's current use is its highest and best use may be rebutted. Paragraph 11.7 states that a non-financial asset's current use is presumed to be its highest and best use unless it is highly probable that, within one year of the asset's measurement date, the asset will either be sold to a buyer who would use the asset for a different use or be redeployed by the entity.

Financially feasible use

BC79 The 'financially feasible use' requirement in AASB 13, paragraph 28 (c) for identifying the highest and best use of a non-financial asset refers to generating an investment return that market participants would require from an asset. To express that criterion in a manner easier for preparers who are not accounting experts to adapt it to a Tier 3 context, the Board decided to modify the text of paragraph 28(c) of AASB 13 included in

the Tier 3 Standard to avoid limiting the fair value of any non-financial asset to the present value of cash inflows generated directly by the asset.

BC80 The proposal in this ED that would replace paragraph 28(c) of AASB 13 refers to an assessment whether the use makes financial sense, ie it would generate at least a market rate of return on investing in the asset or sufficient goods/services to beneficiaries to justify buying the asset (paragraph 11.6(c)).

Fair value hierarchy

- BC81 As noted in paragraph BC74, the DP stated the Board's preliminary view that fair value measurements in financial statements of Tier 3 entities should be determined by reference to a specified hierarchy. For the reasons in paragraphs BC82–BC83, on redeliberating that preliminary view, the Board decided to propose not to include in the Tier 3 Standard the fair value hierarchy set out in paragraphs 72–90 and B35 and B36 of AASB 13.
- BC82 AASB 1060 includes none of AASB 13's disclosure requirements for fair value measurements. Because the Board proposes that disclosure requirements for Tier 3 entities should not be more onerous than the disclosure requirements for Tier 2 entities, the Board proposes that Tier 3 entities should not be required to make the disclosures about their fair value measurements in AASB 13, although some disclosures about fair value measurements would be required by various sections of this Standard (consistent with AASB 1060).
- AASB 13 (paragraph 61) and paragraph 11.8 of this ED require fair value estimates to maximise the use of relevant observable inputs and minimise the use of unobservable inputs; the fair value hierarchy classifies the outcomes of applying that principle and requires differentiated disclosures for different levels of the fair value hierarchy (the IASB's Basis for Conclusions on IFRS 13 Fair Value Measurement, paragraphs BC166–BC221, does not identify any other role for the fair value hierarchy). In addition, that Basis for Conclusions states that "IFRS 13 does not contain a hierarchy of valuation techniques ..." (paragraph BC142). For the reasons explained above, the Board considers that guidance on the fair value hierarchy would only be necessary if disclosure were required of the levels of the fair value hierarchy at which the fair values of assets are measured. The Board also notes that applying the fair value hierarchy might involve significant judgements and be costly for Tier 3 entities to apply, without significant apparent benefits to users of financial statements of those entities. Consequently, the Board concluded that, since it does not propose adopting the disclosure requirements for fair value measurements in AASB 13 (see paragraph BC86), it would not be proportionate to include the fair value hierarchy in the Tier 3 Standard.

Cost approach

- BC84 Paragraph 11.10 of the ED was included to provide brief guidance on the cost approach (also termed the current replacement cost method) to estimating a non-financial asset's fair value. The cost approach is likely to be important to fair value measurements (where used) of a range of non-financial assets held by Tier 3 entities, particularly because the income approach would have limited application when assets are not held primarily to generate net cash inflows.
- BC85 Although the objective of a fair value measurement of an asset is to estimate the asset's selling price, sometimes the observable selling price of a similar asset might not represent faithfully the selling price of the asset being measured (in terms of paragraph 11.8, it might not be a *relevant* observable input). For example, the only observable selling price for a similar asset to an asset held by the entity might be for a sale of that similar asset for scrap value at the end of its economic life, eg because the asset is specialised. Where the entity's asset has not reached the end of its economic life, its selling price might be represented more faithfully by, for example, using the cost approach (ie current replacement cost) referred to in paragraphs 11.9(b) and 11.10.

Disclosures

As noted in paragraph BC82, AASB 1060 includes none of AASB 13's disclosure requirements for fair value measurements. Because the Board proposes that disclosure requirements for Tier 3 entities should not be more onerous than the disclosure requirements for Tier 2 entities, the Board proposes that Tier 3 entities should not be required to make the disclosures about their fair value measurements in AASB 13, although some disclosures about fair value measurements would be required by various sections of this Standard (for example, consistent with AASB 1060, this ED proposes that, for revalued classes of property, plant and equipment, disclosure is made of the effective date of the revaluation and whether an independent valuer was involved).

Investment in associates and joint arrangements (including joint ventures)

- BC87 The Board had not received feedback from stakeholders in its preliminary outreach that entities were concerned about the accounting requirements for an entity's investments in its associates and joint ventures under AASB 128 *Investments in Associates and Joint Ventures*. As such, the Board considered it may be appropriate to continue to require entities to apply the equity method of accounting for an investor's investments in associates and joint ventures. However, the Board observed that such an approach might not be consistent with its preliminary view in the DP to allow Tier 3 entities to prepare separate financial statements rather than consolidated financial statements as their only set of financial statements as per paragraph BC46 where the entity's subsidiaries are not consolidated.
- BC88 Consequently, the Board expressed the following preliminary views in the DP regarding requirements for investments in associates and joint ventures:
 - (a) a parent entity that presents consolidated financial statements or an entity that is not a parent entity applies the equity method of accounting to its investments in associates and joint ventures, consistent with Tier 2 requirements;
 - (b) a parent entity that presents separate financial statements as its only financial statements does not apply the equity method. Instead the parent entity's investments in associates and joint ventures are measured either at cost or at fair value through other comprehensive income; and
 - (c) an investor that presents separate financial statements, whether in addition to consolidated financial statements or equity-accounted financial statements or as its only financial statements measures its investments in associates and joint ventures either at cost or at fair value through other comprehensive income.
- BC89 Most stakeholders agreed with the Board's preliminary views in the DP outlined in paragraph BC88 as they consider entities with investments in associates and joint ventures might be complex, therefore warranting reporting requirements that are consistent with Tier 2 requirements. However, a few stakeholders disagreed and considered that an entity, whether a parent entity or an investor that elects to present separate financial statements only should be given the accounting policy choice to apply the equity method to measure its investments in associates and joint ventures. They considered that the reporting requirements proposed for investments in associates and joint ventures should be consistent with the reporting requirements proposed for investments in subsidiaries, to allow an accounting policy choice to measure the investments at cost, at fair value or by applying the equity method (see paragraph BC53).
- BC90 The Board considered the feedback in conjunction with its decision on the definition of notable relationships and decided to propose in this ED to require an entity to measure its investments in associates and joint ventures consistently with how it measures its investments in notable relationship entities noted in paragraph BC55. This approach allows preparers to elect an accounting policy to measure investments in associates and joint ventures that meet their users' needs rather than restricting the measurement bases depending on the type of entity as described in paragraph BC88. It also ensures the accounting for investments in associates and joint ventures in separate financial statements complements the proposed accounting for notable relationship entities while maintaining consistency with Tier 1 and Tier 2 requirements.

Intangible assets

- BC91 The Board did not express a preliminary view in the DP on Tier 3 reporting requirements for intangible assets because the Board sought feedback on whether intangible assets would commonly be used by Tier 3 entities and, if so, in what manner.
- BC92 Stakeholders expressed mixed views on whether intangible assets were commonly held and recognised by Tier 3 entities. Many stakeholders noted that some intangible assets, such as software, licences and trademarks are most commonly held by Tier 3 entities. These stakeholders requested guidance on accounting for intangible assets, especially due to an increasing trend to use more intangible assets that is also expected to continue in the future. However, some stakeholders commented there were no, or immaterial, intangible assets held by Tier 3 entities. Therefore, they did not consider a need to include specific accounting requirements for intangible assets in the Tier 3 Standard.
- BC93 After considering the feedback, the Board decided to propose in this ED to require entities to recognise intangible assets consistent with Tier 2 reporting requirements (ie AASB 138 *Intangible Assets*) except for prohibiting recognition of internally generated intangible assets. The Board considered the simplification to be proportionate for Tier 3 entities, noting that it is often difficult to distinguish between cost arising in a research phase or a development phase to apply the recognition criteria in AASB 138. To further simplify the requirements, the Board also decided to propose in this ED that:

- (a) the useful life of all indefinite-lived intangible assets will be assessed as finite based on management's best estimate, but not exceeding ten years; and\
- (b) reviewing the useful life, residual value and amortisation method of intangible assets is required only if a trigger event or indicator occurs, consistent with those developed for impairment (see paragraph BC114(b)), since the last annual reporting date.
- BC94 The Board considered another alternative approach to allow entities to make an accounting policy choice, thereby giving flexibility to either expense or recognise internally generated intangible assets in accordance with AASB 138. However, the Board considered that allowing an accounting policy choice might be challenging for preparers to apply because it increases the need to apply judgement and might result in inconsistencies and a lack of comparability amongst entities applying the Tier 3 Standard. The Board also considered aligning subsequent measurement of intangible assets with Tier 2 requirements, with simplification of expression only. However, such an approach might not provide enough simplification to cater for Tier 3 entities that, based on stakeholder feedback, are expected to use intangible assets more frequently in the future.
- BC95 The Board also heard requests from some stakeholders to consider developing simplified accounting requirements to account for configuration or customisation costs in a cloud computing arrangement. However, the Board decided not to develop such guidance for Tier 3 entities because it would not necessarily reduce the complexity of assessing the capitalisation of configuration or customisation costs in cloud computing arrangements and might have unintended implications for other NFP entities applying AASB 138. For similar reasons, the Board decided not to develop additional guidance on the development costs of a website that facilitates donations to the NFP entity beyond the guidance already available in AASB Interpretation 132 Intangibles Assets Web Site Costs.

Business combinations

- BC96 The Board did not develop a preliminary view on Tier 3 reporting requirements in relation to business combinations and goodwill because the Board initially considered possible topics to scope out of the Tier 3 Standard would include business combinations, as noted in paragraph BC19. Stakeholders in their feedback on the preliminary views in the DP commented that business combinations are not uncommon and there may be an increasing trend for Tier 3 entities to merge with or acquire other entities. After considering the stakeholder feedback, the Board decided to develop Tier 3 reporting requirements regarding accounting for business combinations and goodwill.
- BC97 Based on the stakeholder feedback calling for simplification to develop simpler and proportionate requirements for the accounting of business combinations for Tier 3 entities and that the approach in AASB 3 *Business Combinations* might be too complex, and therefore that it would be more appropriate to allow Tier 3 entities to recognise the previous Tier 3 entity's assets at book value, the Board decided to propose in this ED to allow entities to measure the assets and liabilities of the combined entity at their pre-combination book values for all combinations. In its deliberations to determine the requirements, the Board noted the possible risk that some Tier 3 entities that are part of the business combination may not have recognised their assets or liabilities, for example Tier 3 entities that applied cash accounting. In this regard, the Board decided to propose requiring material assets and liabilities that do not have a carrying amount recognised in accordance with AAS to be measured initially at their combination-date fair value, except for donated non-financial assets the entity has elected to initially measure at cost as per paragraphs 12.8(a), 14.6(a), 15.4(a) or 16.4(a). The Board considered this exception would align with its proposals to provide entities an accounting policy choice to initially measure non-financial assets acquired for significantly less than fair value, as noted in paragraph BC112.
- BC98 After considering the cost of restating pre-combination comparative information and to avoid doubt about when the combination occurred, the Board decided to propose in this ED that the combination date is deemed to be at the beginning of the reporting period during which the entity combination occurred. This simplification would address stakeholder concerns about challenges and costs in identifying when an acquirer obtains control of the acquiree, similar to the challenges and costs in identifying a complete set of subsidiaries of Tier 3 entities noted in paragraph BC45. The Board also considered whether to provide an option for entities to restate comparative information for one or more prior periods as if the entity combination occurred in a prior period. However, the Board decided not to provide guidance on the presentation of comparative information for the periods prior to the combination date as a form of simplification, to avoid an entity needing to obtain additional information in order to present pre-combination comparative information.
- BC99 The Board noted that its proposals would not give rise to recognition of goodwill, which omits recognising an asset representing the future economic benefits reflected in the price paid by the acquirer in an acquisition. However, the Board heard from stakeholder feedback that mergers and amalgamations are generally the most common combinations and goodwill is often not recognised by Tier 3 entities. As such, the Board decided to propose in this ED that any differences between the consideration paid and the net assets recognised in the

combination (based primarily on pre-combination book values) are recognised directly in equity to balance the cost to preparers with the information usefulness to users.

BC100 As an alternative to the approach noted in paragraph BC97 the Board considered whether to allow entities an option to measure the assets and liabilities of the combined entity at their pre-combination book value for certain business combinations and require the Tier 2 requirements for all other combinations, or simply align with Tier 2 requirements with simplifications. However, the Board considered it would add unnecessary complexity for preparers to determine which method should be applied to account for business combinations including Tier 2 requirements, and even with further simplifications such an approach might not be proportionate for Tier 3 entities. The Board also decided to refer to 'entity combinations' instead of 'business combinations' in the Tier 3 Standard, to use expression reflecting the operating environment of Tier 3 entities.

Leases

- BC101 In forming its preliminary views in the DP, the Board observed that leases appear to be common and possibly material transactions to entities that may prepare Tier 3 GPFS depending on the applicable financial reporting requirements. While the Board considered that users might benefit from comprehensive information stemming from requirements consistent with AASB 16 Leases, the Board considered that applying AASB 16 to account for leases would be likely to impose proportionately greater costs for Tier 3 entities. Consequently, the Board expressed a preliminary view in the DP to:
 - (a) develop a requirement for a lessee to recognise lease payments as an expense on a straight-line basis over the lease term, unless another systematic basis is more representative of the time pattern of the user's benefit, thereby removing the need for a lessee to recognise a right-of-use asset. A corresponding requirement would apply to lessors; and
 - (b) supplement that proposed accounting approach with disclosure requirements about the entity's outstanding lease commitments.
- BC102 The Board noted that its proposed approach might provide less information to users of financial statements of a Tier 3 entity about the entity's underlying financial position, especially for assets that have been, in essence, purchased by the entity on a payment plan. However, the Board considered not requiring the recognition of lease assets and lease liabilities would impose less costs on preparers than the approach in AASB 16, and:
 - (a) disclosures of an entity's lease commitments could provide the users of these financial statements with sufficient understandable, and hence useful, information;
 - (b) Tier 3 entities may elect to prepare Tier 1 or Tier 2 GPFS; and
 - (c) concessionary leases (ie leases that have significantly below-market terms and conditions principally to enable the entity to further its objectives) would be accounted for in a similar manner under AASB 16.
- BC103 Overall, stakeholders agreed with the Board's preliminary views. In light of that feedback, the Board decided to reflect its preliminary views in its proposals in this ED. In relation to its preliminary view to require disclosure of the entity's dependence on acquisitions of non-financial assets at significantly less than fair value, the Board decided to extend the scope of that proposed requirement to also include concessionary leases.

Revenue

- BC104 After considering stakeholders' feedback during preliminary outreach, the Board expressed preliminary views in the DP that Tier 3 not-for profit entities:
 - (a) should not be required to apply two different Standards (AASB 15 Revenue from Contracts with Customers and AASB 1058 Income of Not-for-Profit Entities) to account for their various types of income (as is required of Tier 2 NFP entities) or, similarly, to account for income based on the nature of the transaction (eg donations, sales or grants); and
 - (b) should defer recording income from inflows of resources if there is an unsatisfied commonly understood expected use of those resources (eg to transfer goods or services to customers or beneficiaries, or to use the resources over a specified period). A common understanding does not require a documented explicit stipulation by a transferor of a resource, an enforceable right of the transferor (eg a right of return of a resource if not used as expected) or a mandated threshold of specificity regarding how the resources are to be used.
- BC105 Other approaches to the recording of income considered by the Board are noted below, together with the key reasons why the Board did not advocate them in its preliminary views in the DP:

- (a) not requiring a distinction for the accounting for inflows of resources. This simple approach might not reflect faithfully that some transferred resources are expected to be spent or used in a future period and should be accounted for differently from donations;
- (b) basing the distinction for the accounting for inflows of resources on either the nature of transactions or whether the resource provider imposed documented explicit stipulations on the expenditure or use of those transferred resources. The Board noted that the distinction by the nature of the transaction would appear to involve a similar two-step process as applied in AASB 15 and AASB 1058, rather than a simplification. Requiring a distinction based on documented explicit stipulations might be challenging to understand for Tier 3 entities that lack detailed financial knowledge and might not result in deferral of recording income even though the Tier 3 entity is expected to spend or use the resources in the future;
- (c) requiring a Tier 3 entity to assess whether the common understanding between it and the resource provider about the future expenditure or use of transferred resources is 'sufficiently specific' based on a simplified version of the criteria for that principle in AASB 15. Stakeholder feedback on outreach before the DP indicated that those criteria are inherently complex and require judgements that would often be prone to inconsistent application; and
- (d) requiring deferral of recording income when conditions are attached to the inflows of resources that are enforceable by the transferor, such as a 'use or return' condition or other means of enforcement. The Board considered that this approach would not reduce the current complexity of accounting for income and would not align with stakeholders' expectations that recording income should be deferred when transferred resources are expected to be spent or used in a future period, regardless of whether enforceable conditions exist.
- BC106 Overall, stakeholders agreed with the Board's preliminary views. In light of that feedback, the Board decided to reflect its preliminary views in its proposals in this ED. Clarifications of terms used in the DP, such as 'common understanding', were included in the ED as suggested by some stakeholders who responded to the DP. In addition, as suggested by some stakeholders, proposed guidance on principal vs agent considerations (eg when a charity receives a grant on behalf of another charity and then forwards it to that other charity) was included in the ED.
- BC107 The Board expressed in the DP a preliminary view that the Tier 2 approach of permitting, but not requiring, a Tier 3 entity to record as income volunteer services received (or a class thereof) if the fair value of those services can be measured reliably should also be applicable to Tier 3 entities. Overall, the stakeholder feedback supported the Board's view; in light of that feedback, the Board decided to propose that policy in this ED. The Board also decided to include a proposed requirement to disclose sufficient information about volunteer services to enable an understanding of the effects of volunteer services on the entity's operations, including the entity's dependence on volunteer services for the achievement of its objectives and any known information about impending significant changes to the nature and amount of volunteer services. This would not require quantifying the value of volunteer services received.

Non-financial assets acquired for significantly less than fair value

- BC108 The Board recognised that Tier 3 entities may have difficulties in obtaining fair value for donated non-financial assets in developing the Board's preliminary view outlined in paragraph BC74 that the Tier 3 Standard should be consistent in principle with the Tier 2 framework including AASB 13 Fair Value Measurement. The Board expressed a preliminary view in the DP to allow an accounting policy choice (similarly to that applicable to subsequent measurement of property, plant and equipment and other non-financial assets) to initially measure assets acquired for significantly less than fair value at either their cost or fair value (current replacement cost for inventories). The Board noted the difference between a donated non-financial asset's fair value and cost on initial measurement is recognised in other comprehensive income rather than as income in the profit or loss if those assets were initially measured at cost and subsequently revalued to fair value. As such, the Board also formed a preliminary view to restrict entities from subsequently revaluing non-financial assets donated or granted that were initially measured at cost, to avoid arbitrary consequences for the application of regulatory reporting thresholds.some stakeholders disagreed with different aspects of the Board's preliminary view, where:
- BC109 some stakeholders considered allowing entities to initially measure donated non-financial assets at cost would result in the omission of important information relating to philanthropic giving. For example, they recognised that some entities reporting to the Australian Taxation Office would already be required to report on the market value of non-cash donations to deductible gift recipient-endorsed entities. However, other stakeholders supported allowing the accounting policy choice outlined in paragraph BC108 as it caters for different entities' circumstances and the approach is a proportionate response for Tier 3 entities. The Board considered the

- feedback received and decided to require in the Standard the accounting policy choice described in paragraph BC108; and
- BC110 some stakeholders considered the management of an entity would be bounded by previous decisions not to allow entities to revalue non-financial assets acquired for significantly less than fair value that were initially measured at cost, even if a revaluation provides more relevant information
- BC111 When forming its preliminary views, the Board considered an alternative approach to only require assets with useful lives of 12 months or more, or where the entity intends to hold those assets for more than 12 months, to be initially measured at fair value to limit costs to preparers. However, the Board was concerned that the need for entities to assess whether an asset has a useful life of 12 months or more would add unnecessary complexity.
 - (a) Most stakeholders supported allowing the accounting policy choice outlined in paragraph BC108 as it caters for different entities' circumstances and the approach is a proportionate response for Tier 3 entities. However,
- BC112 The Board considered the feedback received and decided to propose, consistent with its preliminary view in the DP, the accounting policy choice described in paragraph BC108 for entities to initially measure non-financial assets acquired for significantly less than fair value. The Board considered its proposal is balanced with disclosures that would provide information to users about these assets and consistent with its decisions to simplify lease accounting (by not requiring Tier 3 entities to recognise right-of-use assets). The Board also considered the feedback that management of the entity would be bounded by the previous management's decisions noted in paragraph Error! Reference source not found. and decided to allow entities an accounting policy choice to subsequently measure those assets at cost or at fair value regardless of the initial-measurement policy, consistent with Tier 2 principles.

Impairment of non-financial assets

- BC113 The Board recognises the importance of including impairment requirements in its Tier 3 Standard, even though initial research suggested that impairment losses for non-financial assets appear to be uncommon for Tier 3 entities. The Board considered that Tier 3 entities might consider impairment only when a significant event occurs and it is clear that the asset's carrying amount is no longer recoverable. Including impairment requirements is important to ensure that non-financial assets would not be carried at too high a value and provide a faithful representation of the entity's financial position and performance.
- BC114 In recognition of the complexities in the existing impairment model in AASB 136 *Impairment of Assets*, the Board expressed a preliminary view in the DP that the impairment requirements in the Tier 3 Standard should be comprised of the following elements:
 - (a) only non-financial assets subsequently measured at cost or deemed cost to be subject to impairment testing:
 - (b) only to consider whether a non-financial asset is impaired when the asset has been physically damaged or when its service potential might have been adversely affected by a change in the entity's strategy or changes in external demand for the entity's services;
 - (c) a non-financial asset is impaired if its carrying amount exceeds its recoverable amount, where the recoverable amount is higher of its fair value less costs to sell and value in use, with a rebuttable presumption that fair value less costs to sell is the most appropriate measure of a non-financial asset's recoverable amount because non-financial assets are generally not held by NFP entities to generate cash flows; and
 - (d) BC113non-financial assets that do not generate cash flows that are largely independent from other assets can be grouped into cash-generating units.
- BC115 The Board also expressed a preliminary view not to develop Tier 3 reporting requirements to address the reversal of previously recognised impairment losses because, as indicated in paragraph BC113, Tier 3 entities generally consider impairment when there is a significant event such as flood damage. Therefore, consistent with the Board's preliminary view to limit the impairment indicators, the Board considered it unnecessary to develop a requirement to account for the reversal of impairment losses since it is likely the significant event would make the asset's carrying amount permanently irrecoverable.
- BC116 When forming its preliminary views, the Board considered alternative approaches to those described in paragraph BC114, including:
 - (a) requiring all non-financial assets or only non-current non-financial assets to be subject to impairment testing. However, the Board considered non-financial assets that were subsequently carried at fair value would less likely be subject to impairment testing. The Board noted that, in accordance with AASB 136, NFP entity assets held for continuing use of their service capacity that

- are regularly revalued to fair value are not required to be assessed for impairment. Additionally, having different reporting requirements for current and non-current non-financial assets would add unnecessary complexity.
- (b) requiring in-scope non-financial assets to be assessed for impairment indicators annually or periodically. However, considering the types of non-financial assets most commonly held by Tier 3 entities, such as property, plant and equipment, the Board noted their recoverable amount is less likely to fluctuate from year to year. Therefore, the Board did not consider it necessary to require in-scope assets to be assessed for impairment annually or periodically. The Board also considered it would be unhelpful if the Standard does not include explicit requirements for when in-scope assets should be assessed for impairment.
- (c) develop an alternative approach to calculate the recoverable amount or allow flexibility for Tier 3 entities to determine the recoverable amount using a methodology they consider most appropriate. However, the Board concluded that developing an alternative approach or requiring application of significant judgement may introduce unnecessary complexity for preparers and auditors, or introduce inconsistencies with the principles applied in other Tier 3 requirements. Tier 3 entities may also lack the expertise to determine an appropriate methodology in determining the recoverable amount.
- BC117 Overall, stakeholder feedback supported the Board's preliminary views for a simplified impairment model described in paragraph BC114. While a few stakeholders considered the impairment model might still be complex for Tier 3 entities, the Board decided that the other alternative approaches outlined in paragraph BC116 could lead to possible assurance issues. In light of the feedback, the Board decided to reflect its preliminary views in its proposals in this ED. Some stakeholders also considered disposing of an asset is arguably similar to where an asset is damaged or an entity no longer plans to use it at full capacity and suggested that assets being held for sale could be included as an impairment indicator. However, the Board decided to retain the proposed requirements for entities to apply the Tier 2 requirements for assets held for sale to avoid entities needing to assess for impairment whenever the assets are planned to be, or are, held for sale. As such, the Board also confirmed its preliminary view in this ED to limit the impairment indicators to those identified in paragraph BC114(b) rather than including any additional indicators.
- BC118 As a form of further simplification, the Board also decided not to include guidance on recording and measuring an impairment for cash-generating units because Tier 3 entities are unlikely to need to refer to such guidance. The Board considered its proposal not to require or permit the recognition of goodwill in Tier 3 entity combinations noted in paragraph BC97 would also remove the need to provide guidance on the impairment of cash-generating units.

Employee benefits

- BC119 The Board expressed a preliminary view in the DP to simplify the requirements of AASB 119 *Employee Benefits* for short-term paid absences and other long-term employee benefits based on initial stakeholder outreach indicating the challenges in accounting for outstanding employee benefit obligations. To strike an appropriate balance between reducing the complexities and preparation costs for Tier 3 entities and maintaining useful information and relevance to users, the Board expressed preliminary views in the DP that Tier 3 reporting requirements of employee benefits should require:
 - (a) non-accumulating paid absences and termination benefits are to be recognised when the relevant obligating event occurs, for example when the employee becomes sick or on termination of employment. The Tier 3 Standard will not include specific reporting requirements for termination benefits since Tier 3 entities are unlikely to incur termination benefits or have defined benefit plans;
 - (b) recognition of all other employee benefits when an employee has rendered the services that entitle the employee to consideration, regardless of whether the entitlement is vesting or non-vesting. All employee obligations are measured at an undiscounted amount without the need for an entity to consider the present value of the obligation, to remove the need to categorise employee benefits into short or long-term, whereby:
 - (i) an expense is measured at the undiscounted amount of the employee's obligations; and
 - (ii) a liability is recognised at the undiscounted future outflow expected to be required to settle the present obligation. The liability is presented as current or non-current depending on whether the service conditions are met, or expected to be met, wholly before 12 months after the end of the reporting period in which the employees render the related service.
- BC120 The Board also heard from initial stakeholder outreach that determining the likelihood of employee entitlements vesting, for example, for long-service leave can be complex. Therefore, the Board decided to seek stakeholder views whether it is possible to develop further requirements to support the assessments of

the likelihood that an outflow of economic benefits will be required to settle the obligation based on industry-specific probability guidance to calculating long-service leave.

- BC121 As an alternative approach to paragraph BC119, the Board considered whether all paid absences should be treated as non-accumulating benefits and to recognise expenses when the absences occur. Such a requirement would be easier to understand and apply as the entity's obligations for outstanding employee benefits would not be recognised as a liability. However, the Board considered this approach would unnecessarily depart from accrual accounting and the resultant reported financial position would not provide users with a complete picture of the entity's commitments and solvency given the relative significance and occurrence of employee benefit balances.
- BC122 Overall, stakeholders agreed with the Board's preliminary views noted in paragraph BC119. However, some stakeholders expressed concerns that requiring an entity to recognise liabilities for non-vesting accumulating employee benefits, such as sick leave, would not align with current practice where sick leave provisions generally are not recognised unless the amounts are due and unpaid to an employee at the end of the reporting period. Stakeholders also considered that requiring an entity to consider future pay increases for determining a provision for employee benefits would add unnecessary complexity. The Board noted its preliminary views that liabilities for employee obligations measured at an undiscounted amount would largely negate any future pay rise. Therefore, the Board decided to propose in this ED not to require an entity to consider future pay increases when determining a provision for employee benefits measured at the undiscounted future outflow expected to be required to settle the present obligation.
- BC123 While stakeholders supported the Board's consideration of whether to develop further requirements to support Tier 3 entities in determining the likelihood of employees becoming entitled to a benefit such as long-service leave, the feedback did not identify any industry-specific guidelines currently applied by Tier 3 entities and provided diverse views of possible simplification. Although some stakeholders suggested that a probability calculation could be simplified to require set probabilities (eg, when recognising long-service leave provisions, assuming for convenience a 100 per cent probability that all employees will become entitled to a vested benefit, or accruing the benefits attributable to all employee services for employees having completed 50 per cent or more of their vesting period for the entitlement), some stakeholders were not supportive of developing any guidance in this regard as it could become outdated and may not factor in changes in the workforce. Ultimately, the Board considered setting a probability assessment that is not based on the entity's facts and circumstances can create unintended consequences and may result in less relevant and faithful financial information over time.

Related party disclosures

- BC124 As noted in BC9, the Board decided on an approach to developing disclosure requirements with AASB 1060 to act as the point of reference for the possible Tier 3 disclosure requirements for transactions where Tier 3 R&M requirements are the same or similar to corresponding Tier 2 R&M requirements. While the Board did not express preliminary views on the particular requirements for related party disclosures in the DP, stakeholders provided feedback on the importance of related party disclosures for users. Some stakeholders also considered some related party disclosures required by Tier 1 or Tier 2 reporting requirements might be onerous for Tier 3 entities and should not be required of Tier 3 entities, for example:
 - transactions like donations, where no benefit is received by the related party, should be exempt from the disclosure requirements; and
 - (b) regarding compensation paid to key management personnel, it might be more useful to users to require disclosure of the relevant award or salary band rather than the total amount of benefits paid.
- BC125 The Board considered the feedback and decided to propose that Tier 3 disclosure requirements for related party transactions should be consistent with Tier 2 requirements because, as noted by stakeholder feedback above, related party disclosures are important for users, especially since related parties might enter into transactions that unrelated parties would not. The Board also noted that existing NFP private sector entities, such as charities, are already required under the ACNC legislation to make related party disclosures regardless of the size of the charity.
- BC126 However, the Board decided that disclosures would not be required for donations from related parties unless evidence indicates the donations could influence the entity's activities or use of resources (see paragraph 28.10). The Board considered these types of transactions are unlikely to influence the pursuit of the separate independent interest of the Tier 3 entity, and other jurisdictional frameworks provide a similar exemption for these types of related party transactions. To further simplify the disclosure requirements for Tier 3 entities, the Board also decided not to require key management personnel disclosures, noting the relevant legislation or regulations may still require key management personnel disclosures for certain NFP private sector entities.

Updating Tier 3 reporting requirements

- BC127 The AASB expects to propose amendments to the Tier 3 reporting requirements by publishing EDs when considered appropriate. Such EDs would be developed only when there is a substantive case for amendments, in applying the AASB Due Process Framework for Setting Standards, and would take into account the findings of the latest post-implementation review of domestic Standards or Interpretations and feedback from agenda consultations. In developing those EDs, the AASB would consider new and amended Tier 1/Tier 2 reporting requirements as well as specific issues brought to its attention regarding the application of the Tier 3 reporting requirements.
- BC128 The AASB expects that amendments might be made to the Tier 3 requirements in accordance with a five-year periodic review cycle. However, on occasion the AASB might identify an urgent matter for which amendment of the Tier 3 reporting requirements needs to be considered outside the periodic review process. Such occasions are expected to be rare.
- BC129 Unless and until the Tier 3 reporting requirements are amended, any changes the AASB might make or propose regarding Tier 1 or Tier 2 reporting requirements would not apply to the Tier 3 reporting requirements. The proposed Tier 3 Standard is a stand-alone document. Entities applying the Tier 3 reporting requirements would not be able to anticipate or apply changes made to Tier 1 or Tier 2 reporting requirements unless and until those changes are incorporated into the Tier 3 reporting requirements. However, this would not preclude an entity that applies the Tier 3 reporting requirements from applying the most recent accounting policy in a Tier 2 reporting requirement pursuant to applying paragraphs 9.4 and 9.5 of the Standard (ie in the absence of specific guidance in the Tier 3 reporting requirements, an entity may elect to consider the requirements and guidance in Tier 2 reporting requirements dealing with similar and related issues).

Transitional requirements

- BC130 The Board considered whether specific transitional requirements needed to be provided to Tier 3 entities when they first apply the Tier 3 Standard, having previously prepared either special purpose financial statements or Tier 1 or Tier 2 GPFS. While the Board did not specifically seek feedback on transitional provisions in the DP, some stakeholders indicated that the transitional provisions provided through AASB 2020-2 Amendments to Australian Accounting Standards Removal of Special Purpose Financial Statements for Certain For-Profit Private Sector Entities to for-profit entities when they first transition from SPFS to GPFS worked well and would be appropriate for Tier 3 entities. Some stakeholders indicated that entities may have selectively applied some AAS, such as AASB 16 Leases. Therefore, these entities would need guidance on whether they would be permitted to carry forward their existing Tier 1 or Tier 2 R&M accounting for balances existing under Tier 1 or Tier 2 reporting requirements when they first transition to the Tier 3 Standard. Given the number of Tier 3 entities that may be affected by the removal of SPFS compared to for-profit entities, some stakeholders considered a longer transitional period should be given to ensure entities have sufficient time to transition from SPSF to GPFS.
- BC131 The Board considered the stakeholder feedback and decided to propose in this ED transitional requirements based on AASB 1 *First-time Adoption of Australian Accounting Standards* with simplification of the expression. The Board considered this approach would be consistent with developing a stand-alone standard as noted in paragraph BC17 rather than directing entities to apply AASB 1. Entities would be able to apply the transitional requirements or apply the Tier 3 requirements directly by applying a modified retrospective approach to resulting changes in accounting policies with the cumulative effects on prior periods recognised in the current period's opening retained earnings, without restating comparative information presented for prior period(s). The Board also decided to provide optional relief for Tier 3 entities transitioning to Tier 3 requirements for the first time:
 - (a) not to be required to provide comparative information for new disclosures or distinguish corrections of prior period errors from changes in accounting policies for entities transitioning from SPFS to preparing GPFS, thereby providing the same optional relief provided to for-profit entities in AASB 2020-2; and
 - (b) to elect to continue applying any Tier 1 or Tier 2 R&M and disclosure requirements to balances that existed on the transition date for entities transitioning from Tier 1 or Tier 2 GPFS to Tier 3 GPFS without needing to make adjustments, which may be more complex.
- BC132 When forming its proposals for this ED, the Board considered an alternative approach for entities transitioning to Tier 3 reporting requirements for the first time, to elect to restate comparative information presented for prior period(s) or:
 - (a) for an entity that previously prepared SPFS, to apply the Tier 3 requirements prospectively and attach its previous financial statements and a list of its previously adopted accounting policies; and

- (b) for an entity that previously prepared Tier 1 or Tier 2 GPFS, to present comparative information based on the entity's financial statements for the previous period prepared in accordance with Tier 1 or Tier 2 requirements.
- BC133 The Board considered the approach in paragraph BC132 is similar to its proposed approach in this ED, which allows entities not to restate their comparative information presented for prior period(s). However, the Board considered this approach would be inconsistent with the transitional provisions provided to for-profit entities, and allowing entities to attach their previous financial statements might add to the length of the financial statements for the year of transition. The Board also considered replicating the approach provided to for-profit entities in AASB 2020-2 to refer entities to apply AASB 1 directly and to provide the optional relief proposed in paragraph BC132(a) as short-term relief for entities transitioning to Tier 3 requirements for the first time. However, the Board considered requiring entities to apply AASB 1 directly would be more complex and imposing a time limit for the optional relief might not provide sufficient transition support for Tier 3 entities.
- BC134 The Board considered that entities that adopt this Standard in the future might need or desire to adopt Tier 2 or Tier 1 GPFS if, for example, the Tier 3 entity no longer qualifies to apply this Standard due to its size based on the reporting requirements of respective legislation or regulation. A Tier 3 entity may also consider its activities to be more complex and may prefer to adopt the Tier 2 or Tier 1 requirements to better reflect the entity's financial position, financial performance and cash flows for users of their financial statements. Acknowledging the differences in R&M requirements under this Standard compared to Tier 2 or Tier 1 reporting requirements, the Board decided to propose in this ED that entities transitioning from Tier 3 GPFS to Tier 1 or Tier 2 GPFS for the first time would apply AASB 1. Based on similar reasons to those outlined in paragraph BC133 for not imposing a time limit for the optional relief, the Board decided to provide similar transitional requirements in paragraph 18A of AASB 1053 Application of Tiers of Australian Accounting Standards to Tier 3 entities transitioning from Tier 3 GPFS to Tier 2 GPFS for the first time, ie not being required to:
 - (a) restate comparative information;
 - (b) provide comparative information for new disclosures; or
 - (c) distinguish corrections of errors and changes in accounting policies.

Effective date

- BC135 In considering whether to propose a specific effective date for the Tier 3 Standard in this ED, the Board considered various factors, including:
 - (a) the stakeholder feedback requesting a two- to three-year transitional period before the Tier 3 Standard becomes effective, as there would appear to be more Tier 3 entities that would be affected by the removal of SPFS, thus warranting a longer transitional period than the period provided to for-profit entities when they transitioned from SPFS to GPFS under AASB 2020-2 for the first time;
 - (b) the Tier 3 Standard contains simpler accounting requirements which may alleviate the need for a longer transition period. However, the Board is also cognisant that other NFP private sector entities currently preparing SPFS that may elect or be required to move to Tier 1 or Tier 2 GPFS instead of Tier 3 GPFS may require a longer transition period than usual; and
 - (c) in line with the AASB Due Process Framework for Setting Standards, the Board seeks to ensure that stakeholders have adequate time to prepare for the implementation of new and amended Standards and, typically, the Board will issue a Standard at least 2 years before its effective date.
- BC136 The Board considered and rejected an alternative approach, being a phased effective date approach, because it would be unnecessarily complex. The Board also noted that it could assess closer to the effective date ultimately selected whether there is a need to provide a further extension to the effective date. Furthermore, the Board noted that many stakeholders supported allowing entities to adopt this Standard prior to a stated effective date.
- BC137 With regard to the above considerations, the Board decided that the effective date of a finalised Standard will be at least three years after its issue. Therefore, in this ED, the Board is not proposing a specific effective date. That will be determined when the Board considers the feedback on this ED. The Board also decided to align the effective date of the proposed Tier 3 Standard with the effective date of amendments to the *Conceptual Framework for Financial Reporting* and other AAS to extend their application to more NFP entities.