REPRESENTATION 108/23



DRAFT ENDORSEMENT CRITERIA ASSESSMENT OF SUPPLIER FINANCE ARRANGEMENTS (AMENDMENTS TO IAS 7 AND IFRS 7)

Issued 16 October 2023

ICAEW welcomes the opportunity to comment on the Draft Endorsement Criteria Assessment (DECA) of Supplier Finance Arrangements (Amendments to IAS 7 and IFRS 7) published by UK Endorsement Board on 20 July 2023, a copy of which is available from this link.

For questions on this response please contact the Corporate Reporting Faculty at crf@icaew.com quoting REP 108/23.

ICAEW supports the UKEB DECA: Supplier Finance Arrangements (Amendments to IAS 7 and IFRS 7), effective on or after 1 January 2024 with earlier application permitted.

This response of 16 October 2023 has been prepared by the ICAEW Corporate Reporting Faculty. Recognised internationally as a leading authority on corporate reporting, the faculty, through its Financial Reporting Committee, is responsible for formulating ICAEW policy on financial and non-financial reporting issues and makes submissions to standard setters and other external bodies on behalf of ICAEW. The faculty provides an extensive range of services to its members including providing practical assistance with common corporate reporting problems.

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ICAEW REPRESENTATION 108/23 DRAFT ENDORSEMENT CRITERIA ASSESSMENT OF SUPPLIER FINANCE ARRANGEMENTS (AMENDMENTS TO IAS 7 AND IFRS 7)

KEY POINTS

- 1. ICAEW supports the UK endorsement of the IASB's amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures published in 2023.
- 2. This response of 16 October 2023, included in the appendix below, has been prepared on behalf of ICAEW by the Corporate Reporting Faculty.

APPENDIX - DETAILED RESPONSE

Invitation to Comment

Call for comments on Draft Endorsement Criteria Assessment of *Supplier Finance Arrangements* (Amendments to IAS 7 and IFRS 7)

Deadline for completion of this Invitation to Comment:

Close of business, Wednesday 18 October 2023

Please submit to:

UKEndorsementBoard@endorsement-board.uk

Introduction

The objective of this Invitation to Comment is to obtain input from stakeholders on the endorsement and adoption of *Supplier Finance Arrangements* (Amendments to IAS 7 and IFRS 7) (the Amendments), published by the International Accounting Standards Board (IASB) in May 2023. The Amendments aim to provide users of financial statements with the information that enables them to assess the effect of supplier finance arrangements on an entity's liabilities and cash flows, as well as on its liquidity risk and risk management. The Amendments will be effective for annual periods beginning on or after 1 January 2024. Earlier application is permitted. The information collected from this Invitation to Comment is intended to help with the endorsement assessment.

UK endorsement and adoption process

The requirements for UK adoption are set out in Statutory Instrument 2019/6851.

The powers to formally adopt international accounting standards for use in the UK were delegated to the UK Endorsement Board in May 2021².

Who should respond to this Invitation to Comment?

Stakeholders with an interest in the quality of accounts prepared in accordance with IFRS Accounting Standards.

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The International Accounting Standards and European Public Limited-Liability Company (Amendment etc.) (EU Exit) Regulations 2019: https://www.legislation.gov.uk/uksi/2019/685/made

The International Accounting Standards (Delegation of Functions) (EU Exit) Regulations 2021: https://www.legislation.gov.uk/uksi/2021/609/contents/made

How to respond to this Invitation to Comment

Please download this document, answer any questions on which you would like to provide views, and return it to UKEndorsementBoard@endorsement-board.uk by close of business on Wednesday 18 October 2023.

Brief responses to individual questions are welcome, as well as comprehensive responses to all questions.

Privacy and other policies

The data collected through submitting this document will be stored and processed by the UKEB. By submitting this document, you consent to the UKEB processing your data for the purposes of influencing the development of and adopting IFRS for use in the UK. For further information, please see our Privacy Statements and Notices and other Policies (e.g. Consultation Responses Policy and Data Protection Policy)³.

The UKEB's policy is to publish on its website all responses to formal consultations issued by the UKEB unless the respondent explicitly requests otherwise. A standard confidentiality statement in an e-mail message will not be regarded as a request for non-disclosure. If you do not wish your signature to be published, please provide the UKEB with an unsigned version of your submission. The UKEB prefers to publish responses that do not include a personal signature. Other than the name of the organisation/individual responding, information contained in the "Your Details" document will not be published. The UKEB does not edit personal information (such as telephone numbers, postal or e-mail addresses) from any other response document submitted; therefore, only information that you wish to be published should be submitted in such responses.

These policies can be accessed from the footer in the UKEB website here: https://www.endorsement-board.uk

Assessment against endorsement criteria

Our draft assessment [tentatively] concludes that:

- i. the Amendments meet the criteria of relevance, reliability, understandability and comparability required of the financial information needed for making economic decisions and assessing the stewardship of management, as required by SI 2019/685 (see Regulation 7(1)(c));
- ii. application of the Amendments is not contrary to the principle that an entity's accounts must give a true and fair view as required by SI 2019/685 (see Regulation 7(1)(a)); and
- iii. that the Amendments are likely to be conducive to the long term public good in the UK as required by SI 2019/685 (see Regulation 7(1)(b)), having considered:
 - whether they will generally improve the quality of financial reporting;
 - the costs and benefits that are likely to result from their use; and
 - whether they are likely to have an adverse effect on the economy of the UK, including on economic growth.

Our assessment of the Amendments is set out in **Section 2** of the DECA.

Questions

Technical accounting criteria assessment

1.	Do you agree with our assessment of comparability, and in particular the view that the principle-based approach (not defining but describing the characteristics of supplier finance arrangements in scope of the Amendments) is on balance workable and allows for the application of judgement, thereby assisting preparers (and their auditors) in ensuring the disclosure objectives are met? (please select one option)							
	Yes		No					
2.	Please include	any comments you m	ay have in response to	o question 1:				
No	No comments.							
3.	Do you agree with the draft assessment of the Amendments against the technical accounting criteria? (please select one option)							
	Yes	\boxtimes	No					
4. No (Please include any comments you may have in response to question 3:							
Tru 5.	e and fair vio		ent that the Amendme	ents are not contrary to				
0.	Do you agree with the draft assessment that the Amendments are not contrary to the true and fair view requirement? (please select one option)							
	Yes	\boxtimes	No					
6. No.	Please include	any comments you m	ay have in response to	o question 5:				

UK long term public good

7. If you are responding on behalf of an organisation that offers supplier finance arrangements, do you currently provide to your clients the relevant information required by the Amendments including the amounts for which suppliers have already received payment from your organisation? If not, have you identified any

ICAEW REPRESENTATION 108/23 DRAFT ENDORSEMENT CRITERIA ASSESSMENT OF SUPPLIER FINANCE ARRANGEMENTS (AMENDMENTS TO IAS 7 AND IFRS 7)

restrictions or challenges (such as legal or IT systems) that could prevent you from sharing such information? (please select one option)

Not applicable.

14.

No comments.

8.	Please include any comments you may have in response to question 7, including if relevant a description of the challenges your organisation faces in sharing relevant information with your clients:						
Not	applicable.						
9.	Do you agree with the initial assessment of costs for preparers, in particular is relation to the accessibility of all the required information, including the carrying amounts of the financial liabilities for which suppliers have already received payment from the finance providers? (please select one option)						
	Yes	\boxtimes	No				
10.	Please include any comments you may have in response to question 9, including if any costs have been omitted or any challenges your organisation faces accessing the information required by the Amendments.						
No o	comments.						
11.	Do you agree with the initial assessment of benefits likely to arise from the Amendments? (please select one option)						
	Yes	\boxtimes	No				
12.	Please include any comments you may have in response to question 11, including if any benefits have been omitted:						
No o	comments.						
13.		vith the initial overall as Amendments? (please s		nd benefits likely to			

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Please include any comments you may have in response to question 13:

15.	Do you agree with the draft assessment that the Amendments are likely to be conducive to the long term public good in the UK ? (please select one option)							
	Yes	×	No					
16.	16. Please include any comments you may have in response to question 15:							
No comments.								
17. Do you have any other comments you would like to add?								
No d	comments.							

Thank you for completing this Invitation to Comment

Please submit this document
by close of business on Wednesday 18 October 2023 to:

<u>UKEndorsementBoard@endorsement-board.uk</u>