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PRIMARY FINANCIAL STATEMENTS – BRIEFING ON THE REPLACEMENT TO THE PRESENTATION OF FINANCIAL STATEMENTS ACCOUNTING STANDARD



The International Accounting Standards Board (IASB) has recently completed its technical work on the primary financial statements (PFS) project, which will result in the release of a new IFRS Accounting Standard that will replace IAS 1 *Presentation of Financial Statements*. This forthcoming accounting standard, expected to be designated as IFRS 18, will introduce significant changes to the presentation requirements of financial statements.

In line with the Hong Kong Institute of Certified Public Accountants' (HKICPA) commitment for Hong Kong accounting standards to fully converge with IFRS accounting standards, it is anticipated that the HKICPA will issue the equivalent HKFRS in a timely manner.

Appended to this *HKFRS/IFRS Update* is a newsletter published by BDO Global which provides an overview of this forthcoming accounting standard. The newsletter covers the background of the PFS project, outlines the expected requirements, highlights the areas of significant change, explores the practical implications, and offers guidance for transition and getting started with the new standard.

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PRIMARY FINANCIAL STATEMENTS -BRIEFING ON THE REPLACEMENT TO IAS 1

INTERNATIONAL FINANCIAL REPORTING BULLETIN

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INTRODUCTION

IFRS 9 Financial Instruments, IFRS 15 Revenue from Contracts with Customers, IFRS 16 Leases and IFRS 17 Insurance Contracts have significantly changed the recognition and measurement requirements for financial instruments, revenue, leases and insurance contracts respectively, however, the next IFRS Accounting Standard expected to be issued by the IASB will significantly change the presentation requirements of IFRS Accounting Standards.

In July 2023, the International Accounting Standards Board (IASB) completed technical work on its primary financial statements (PFS) project, which will conclude with the release of an IFRS Accounting Standard replacing IAS 1 *Presentation of Financial Statements*. The new IFRS Accounting Standard will set out significant new requirements for how financial statements are presented, with particular focus on the statement of profit or loss, including requirements for mandatory subtotals to be presented, aggregation and disaggregation of information, as well as disclosures related to management performance measures.

The IASB is expected to issue this new IFRS Accounting Standard, likely to be numbered IFRS 18 (and referred to as such throughout this publication), in H1 2024. The effective date of IFRS 18 is expected to be for annual reporting periods beginning on or after 1 January 2027.

STATUS Expected to be issued in H1

2024

EXPECTED EFFECTIVE DATE 1 January 2027

ACCOUNTING IMPACT

The expected IFRS Accounting Standard will have a significant effect on how entities present their financial statements. The aspects that will be significantly affected include categorisation of income and expenses, aggregation/ disaggregation and labelling of information, sub-totals in the statement of profit or loss, disclosure of management performance measures.

The final text of IFRS 18 is not yet available as at the time of this publication's release, however, staff papers and decision summaries published by the IASB set out the conclusions reached by the Board and therefore, the fundamental requirements of IFRS 18 may be reasonably understood. However, it is possible for the final text of IFRS 18 to differ as the standard is finalised, therefore, the contents of this publication may differ from the final requirements of IFRS 18. Staff papers, decision summaries and other documents may be accessed on the <u>Primary Financial Statements project page</u> on the IASB's website. <u>Staff paper 21A - Consideration of the re-exposure criteria</u> from the meeting of the IASB held in July 2023 provides a summary of the tentative decisions of the IASB.

This publication is organized as follows:

- 1. Background on the PFS project
- 2. Requirements in IAS 1 expected to be brought forward into IFRS 18
- 3. Areas of significant change from IAS 1 vs. IFRS 18
 - Categories in the statement of profit or loss
 - Line items and sub-totals
 - Labelling, aggregation and disaggregation
 - Statement of cash flows: operating cash flows, and classification of interest and dividend cash flows
 - Management performance measures
- 4. Practical implications of the new requirements
- 5. Transition and effective date
- 6. How to get started



BACKGROUND ON THE PFS PROJECT

The IASB has received feedback from investors that the comparability of entities' statement of profit or loss was reduced due to a lack of consistency in how financial performance has been presented. For example, two entities may have similar operations in a similar industry, but they may present the results of their operations differently. Some entities also use management performance measures of profit that reduce comparability as well. For example:

- Many entities present 'operating profit' in the statement of profit or loss, but it may be defined differently. Some entities may not present operating profit at all, as there is no requirement to present such a sub-total in IAS 1.
- One entity may present 'operating profit' as including the results of associates accounted for using the equity method, with others including this amount outside of operating profit. There may be other differences in how entities calculate sub-totals.
- Entities may disclose management performance measures of financial performance outside of the financial statements (e.g. press releases, strategic reports, management discussion & analysis, etc.), which are defined differently (e.g. earnings before interest, taxes, depreciation and amortisation (EBITDA), adjusted profit, profit excluding non-recurring items, etc.).

In response to these concerns, the IASB undertook a project to replace IAS 1 with a new IFRS Accounting Standard to increase the comparability of financial performance presented by entities.

The IASB issued an exposure draft (ED) in 2019, which set out its proposals (see <u>BDO's comment letter</u> in response to the ED). The IASB deliberated on the feedback received and completed its technical work in July 2023.

REQUIREMENTS IN IAS 1 EXPECTED TO BE BROUGHT FORWARD INTO IFRS 18

While IFRS 18 is expected to introduce significant changes to financial statement presentation, not all aspects of IAS 1 are being revised. In many areas, the requirements of IAS 1 are expected to be 'brought forward' into IFRS 18 substantially unchanged. This approach is depicted below:



The following is a summary of topics in IAS 1 that are expected to be 'brought forward' into IFRS 18 without significant changes:

- 1. The primary financial statements required to be included in financial statements (e.g. statements of financial position, profit or loss, cash flows, etc.)
- 2. Frequency of reporting
- 3. Comparative information
- 4. Offsetting
- 5. Most statement of financial position requirements
- 6. Classification of assets and liabilities as current vs. non-current (subject to 2020 and 2022 amendments concerning the classification of certain liabilities (See <u>IFRB 2022/07 IASB Issues</u> <u>Amendments to IAS 1 Non-current Liabilities with Covenants</u>)
- 7. Most statement of cash flows requirements (refer to IAS 7)
- 8. Statement of comprehensive income requirements
- 9. Statement of changes in equity requirements
- 10. Capital disclosures

AREAS OF SIGNIFICANT CHANGE FROM IAS 1 VS. IFRS 18

Categories in the statement of profit or loss

Under IAS 1, there is no requirement to classify income and expenses into 'classes' or 'categories'. In order to enhance consistency, and to permit consistent line items and sub-totals (see below), IFRS 18 will require items of income and expense to be classified into five categories:

<u>Category</u>	<u>Description</u>	
Investing	 *Income and expenses relating to: Assets that generate a return individually and largely independently of the entity's other resources (e.g. interest income, returns on other financial assets); Investments in subsidiaries, associates and joint ventures; and Cash and cash equivalents. 	
Financing	 *Income and expenses relating to: Changes in the carrying amount of liabilities that arise from transactions that involve only the raising of finance (e.g. interest expense); Certain other items of interest income and expense (e.g. interest income arising from the unwinding of the discount on an asset retirement obligation in the scope of IAS 37). 	
Income tax	Income tax expense and income arising from the application of IAS 12 <i>Income Taxes</i> .	
Discontinued operations	Income and expenses from discontinued operations arising from the application of IFRS 5 <i>Non-current Assets Held for Sale and Discontinued Operations</i> .	
Operating	Residual category if income and expenses are not classified into other categories.	

*Classification of investing and financing cash flows are also affected by certain accounting policy choices made and an assessment of an entity's 'main business activities' - see explanation below.

Despite IFRS 18 containing operating, investing and financing categories, there is not explicit alignment between these categories and the corresponding categories in the statement of cash flows as per IAS 7, however, income and expense and the associated cash flows may be classified similarly in many cases.

While the stated goal of the PFS project was to increase the comparability of financial performance between entities, the classification of income and expenses will not be identical for all entities. This is because IFRS 18 will require entities to assess 'main business activities'. Entities with specified main business activities may classify investing and/or financing items as operating in certain cases.

For example, Entity A is a manufacturer with excess cash invested in publicly traded equity instruments, however, investing in such assets is not a main business activity for Entity A. Entity Z is a bank with a significant number of publicly traded equity instruments held, which it actively trades as part of its main business activities.

Entity A is likely to classify income arising from its equity investments as investing, whereas Entity Z will likely classify such income as operating because it relates to Entity Z's main business activities.

IFRS 18 is also expected to include certain accounting policy choices regarding classification of certain income and expenses for entities with specified main business activities. The scope of these options is beyond the scope of this publication.

Line items and sub-totals

Once items of income and expense are classified, the categorization results in line items and sub-totals being presented in the statement of profit or loss, some of which will be mandatory.

IAS 1 currently has limited requirements regarding line items and sub-totals. Revenue is presented as the 'top line' in the statement of profit or loss, with 'profit' being presented as the final line item, with limited guidance about how income and expenses are categorised and which sub-totals are presented.

In addition to mandatory totals and sub-totals required by IAS 1 currently (e.g. profit before income taxes, profit or loss, etc.), IFRS 18 will introduce two new mandatory sub-totals:

- Operating profit or loss: the sub-total of all income and expense classified as operating.
- Profit before financing and income tax: the sub-total of operating profit or loss and all income and expenses classified as investing.

A simple illustration of these requirements is presented below for an entity without specified main business activities (i.e. the entity does not invest in assets or provide financing to customers as a main business activity):

Line item / sub-total	<u>Amount in currency</u> <u>units (CU)</u>	<u>Classification of income</u> and expenses	<u>Explanation</u>	
Revenue	1,000			
Cost of sales	<u>(400)</u>	Operating	'Cost of sales' line item must include inventories expensed (IAS 2).	
Gross profit	600		IFRS 18 will not mandate the presentation of a 'gross profit' sub-total, however, it will not preclude this approach.	
Salaries and benefits	<u>(100)</u>	Operating		
Operating profit	500		New mandatory sub-total: the sub- total of all income and expense classified as operating.	
Share of profit from associates	<u>25</u>	Investing	Income or expense related to the application of the equity method will never be classified as operating, which may be a change in practice for some entities.	
Profit before financing and income tax	525		New mandatory sub-total: the sub- total of operating profit or loss and all income and expenses classified as investing.	
Interest expense on bank loans	<u>(50)</u>	Financing	Expense classified as financing.	
Profit before income tax and discontinued operations	475		Sub-total already required by IAS 1 / IFRS 5.	
Income tax expense	<u>(100)</u>	Income tax		
Profit from continuing operations	375		Sub-total already required by IAS 1.	
Profit from discontinued operations	<u>10</u>	Discontinued operations	Sub-total already required by IAS 1 / IFRS 5.	
Profit	385		Total already required by IAS 1.	

This presentation may not differ significantly from the presentation adopted by entities under current practice; however, this example is simple and does not illustrate more complex situations and the application of certain policy choices that IFRS 18 will introduce for certain entities.

Labelling, aggregation and disaggregation

IFRS 18 will expand the requirements for labelling, aggregation and disaggregation as follows:

<u>Requirement</u>	Explanation of Requirement		
Principles of aggregation and disaggregation	 Require an entity to classify identified assets, liabilities, equity, income and expenses into groups based on shared characteristics and to separate those items based on further characteristics. Items should be disaggregated if the resulting disaggregation is material. IFRS 18 will also set out characteristics of items that may result in their aggregation or disaggregation. 		
Use of 'other' label	• Require an entity to use the 'other' label only if it is unable to find a more informative label.		
	• For an aggregation of varied material items, require use of a label that is as precise as possible about the type of item the 'other' amount is, for example, 'other operating expenses' or 'other finance expenses'.		
	• For an aggregation of varied immaterial items, require an entity to consider whether the aggregated amount is large enough that users of financial statements might question what it includes. If so, further information about that amount is material and accordingly would be provided by the entity.		
Presentation and disclosure of expenses classified as operating	 Continue to permit presentation of expenses in the operating category by nature (e.g. salaries, depreciation, etc.) or function (e.g. administration, selling, etc.). 		
	 A 'mixed' presentation of operating expenses by nature (e.g. salaries) and function (e.g. cost of sales) may be appropriate. 		
	 Introduce new requirements for entities that classify expenses by function, including the requirement to disclose in a single note expenses by nature for certain amounts (depreciation, amortization, employee benefits, impairment and write-downs of inventories). 		

Statement of cash flows: operating cash flows, and classification of interest and dividend cash flows

IFRS 18 will supersede IAS 1, however, its finalization is also expected to result in certain consequential amendments to other IFRS Accounting Standards.

The current requirements of IAS 7 are compared with the revised requirements expected once IFRS 18 is finalised:

<u>Requirement of IAS 7</u>	<u>Current requirements</u>	<u>Revised requirements expected</u> once IFRS 18 is finalized
Starting point for operating cash flows in the statement of cash flow when the indirect method is used	Profit or loss	Newly introduced mandatory sub- total in the statement of profit or loss: operating profit or loss
Classification of interest and dividend cash inflows	Accounting policy choice: operating or investing cash flows	Elimination of accounting policy choice: investing cash flows, except for entities with specified main business activities (see below).
Classification of interest cash outflows	Accounting policy choice: operating or financing cash flows	Elimination of accounting policy choice: financing cash flows, except for entities with specified main business activities (see below).
Classification of dividend outflows	Accounting policy choice: operating or financing cash flows	Elimination of accounting policy choice: financing cash flows

The classification of interest and dividend cash inflows and interest cash outflows will usually be investing and financing respectively, as set out above, however, exceptions apply for certain entities.

For entities that provide financing to customers as a main business activity (e.g. a bank) or invest in the course of their main business activities in assets that generate a return individually and largely independently of other resources held by the entity (e.g. insurance and investment entities), interest and dividend income and interest expense may be classified into different categories in the statement of profit or loss. For these entities, the corresponding cash flows are to be classified in the statement of cash flows as follows:

<u>Classification in the</u> <u>statement of profit or loss</u>	<u>Classification of the corresponding cash flows in</u> <u>the statement of cash flows</u>			
Interest and dividend income and interest expense are all classified into a single category.	Cash flows are classified into the same category (e.g. operating in the statement of profit or loss and operating in the statement of cash flows).			
Interest and dividend income and interest expense are classified into more than one	All cash flows are classified into a single category as an accounting policy choice. For example:			
category.	<u>Category</u>	<u>Classification in</u> <u>statement of</u> profit or loss	<u>Classification in the</u> <u>statement of cash flows</u>	
	Interest received	Some as operating and some as financing	Accounting policy to classify all cash flows as operating or financing	
	Interest paid	Some as operating and some as financing	Accounting policy to classify all cash flows as operating or financing	
	Dividend received	Investing	Investing	

Management performance measures

Entities may disclose management performance measures (MPMs) outside of the financial statements to communicate management's view of an aspect of the entity's financial performance. These MPMs are often based on a total or sub-total required by IFRS Accounting Standards with adjustments made. For example:

- Earnings before interest, taxes, depreciation and amortization (EBITDA);
- 'Adjusted' profit (e.g. profit excluding goodwill impairment, share-based payments, etc.); or
- Operating profit excluding non-recurring items (e.g. operating profit excluding the effect of a natural disaster)

These MPMs may be included in press releases, strategic reports, management discussion & analysis, etc. IFRS 18 will introduce requirements that certain MPMs be included in the financial statements with corresponding disclosures.

Which MPMs will be subject to disclosure requirements in the financial statements?

To be subject to IFRS 18's disclosure requirements, an MPM will need to be:

- 1. Used in public communications outside financial statements; and
- 2. Used to communicate to users of financial statements management's view of an aspect of the entity's financial performance.

IFRS 18 will exclude certain forms of public communication (e.g. social media posts, oral communications, etc.), meaning that not <u>all</u> public communications may result in MPM disclosure requirements. Additionally, if an entity does not make such public communications containing MPMs, they may not be subject to any new disclosure requirements. This may be the case for many private companies.

MPMs are only included in IFRS 18's disclosure requirements if they communicate an entity's <u>financial</u> <u>performance</u>, meaning MPMs based solely on the statement of financial position (e.g. adjusted current ratio) or the statement of cash flows (e.g. adjusted operating cash flows) are not included.

As a rule, IFRS 18 will also exclude from the scope of the disclosure requirements of MPMs certain specified sub-totals, such as gross profit or loss and similar sub-totals.

What are the disclosure requirements for MPMs in the scope of IFRS 18's requirements?

For 'scoped in' MPMs, entities will be required to disclose the following information in a single note to the financial statements:

- A description of why the management performance measure communicates management's view of an aspect of the entity's financial performance
- A reconciliation to the most directly comparable total or subtotal specified by IFRS Accounting Standards (e.g. reconcile 'adjusted operating profit' to 'operating profit' as defined by IFRS 18 and explain the adjustments)
- The income tax effect and effect on non-controlling interest for each reconciling item disclosed as per above.

The inclusion of MPMs in financial statements will be a significant adjustment for many entities, as this type of information has historically been disclosed outside of the financial statements. These requirements will also impose a requirement on auditors to be aware of public communications made by entities, which may trigger the requirement to include MPMs in financial statements.

PRACTICAL IMPLICATIONS OF THE NEW REQUIREMENTS

While IFRS 18 does not change any recognition or measurement requirements in IFRS Accounting Standards, it may still have effects on systems and processes. These implications may include the following:

- Financial reporting systems may not be designed to appropriately 'tag' and categorise income and expenses into the categories required by IFRS 18. This may be more complex for groups with multiple financial reporting systems which need to be consolidated into a single financial statement. This may necessitate changes to group financial reporting and consolidation processes.
- The requirement to categorise income and expenses into categories may change how systems and processes function. For example, IFRS 18's requirements for the classification of foreign exchange gains and losses recognised in accordance with IAS 21 may change how an entity's systems and processes are designed compared to existing practice.
- Groups may have entities with multiple main business activities, which change at the consolidated level.
 - For example, Group L is comprised of subsidiaries M and N. Entity M manufactures and sells widgets and has no specified main business activities, so it follows the default categorization requirements in IFRS 18 for the statement of profit or loss. Entity N provides financing to its customers as a main business activity, and therefore its categorization of income and expenses differs from Entity M (e.g. it categories finance income and expense as operating). At the consolidated level, it may be concluded that the group does not provide financing to customers as a main business activity for reasons of materiality (i.e. providing financing to customers is incidental at the consolidated level), meaning the categorisation of expenses by Entity N will need to be adjusted at the consolidated level (e.g. finance income and expenses of Entity N would be reclassified to the financing category at the consolidated level of Group L).
- Entities will need to review how they aggregate, disaggregate and label information based on the revised requirements of IFRS 18. For example, how 'other' labels are used, and how operating expenses are presented.
- Entities will need to identify MPMs and determine which (if any) are within the scope of IFRS 18's disclosure requirements. Entities may need to design new systems, processes and controls around MPMs as a result of their inclusion in the financial reporting process.

TRANSITION AND EFFECTIVE DATE

IFRS 18 will be effective for annual reporting periods beginning on or after 1 January 2027 with restatement of the comparative period being required. Therefore, an entity with a calendar year-end that presents one annual period as a comparative will need to restate the year-ended 31 December 2026 period when it is included as comparative information in the 2027 annual financial statements. This means entities may need to capture the necessary financial information and present it both under the IAS 1 requirements in the 2026 financial statements, as well as the IFRS 18 requirements in the 2027 financial statements.

Consequential amendments to IAS 34 will also require an entity to present each of the required headings and subtotals in IFRS 18 in its condensed interim financial statements in the first year of applying IFRS 18. Therefore, an entity with quarterly reporting requirements in accordance with IAS 34 will be required to report its statement of profit or loss in accordance with IFRS 18's requirements for Q1 2027.

HOW TO GET STARTED

While IFRS 18 is not expected to be issued until H1 2024, the implications of the new standard may be significant for entities. Management and those charged with governance should begin educating stakeholders about the expected requirements of IFRS 18 and the effects it may have on an entity's financial reporting systems, processes and controls. The requirement to disclose certain MPMs in the financial statements may also cause entities to involve communications and investor outreach departments to ensure they are aware of the implications of IFRS 18's requirements on entities in making public communications.

For further information on IFRS Accounting Standards, including the implications of IFRS 18, please contact your <u>local BDO firm.</u>



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