

3 January 2014

Mr. Simon Riley
Acting Director
Standard Setting
Hong Kong Institute of Certified Public Accountants
37th Floor, Wu Chung House
213 Queen's Road East
Wanchai
Hong Kong

Dear Mr. Riley,

Comment on IASB Exposure Draft of Equity Method in Separate Financial Statements

In response to your letter as of 16 December 2013, we are pleased to provide our views on the captioned Exposure Draft as shown in the attached document.

If you need further information, please feel free to contact our Programme Leader, Ms. Maggie Tsong at 3943-9123 or by email at mtsong@cuhk.edu.hk. Thank you.

Yours faithfully,

Ella Chan

Director

Encl.

cc: Maggie Tsong

Programme Leader, Business & Management Division

<u>Comment on IASB Exposure Draft of Equity Method in Separate Financial Statements</u>

In response to the questions proposed in the Exposure Draft, the following comments are given for the Committee's consideration:

Question 1 Use of the Equity Method

We agree that the inclusion of the equity method as one of the options should be added to IAS 27. The equity method was originally existed prior to the 2003 revision and the proposed restoration could largely reduce the entities' compliance costs as well as to fairly reflect the investor's assets value and earnings by using equity method.

Question 2 Transition Provisions

We agree at the IASB proposal that the change should be applied retrospectively and to apply IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors in dealing with the change. It is believed that the change shall be enforced as soon as possible while the required information is already available when the entities prepare the consolidated financial statements for their subsidiaries. Entities are not required to perform any additional procedures and can use the same information in its separate financial statements.

Question 3 First-time Adopters

We would suggest that a special relief shall be given to those first-time adopters if they elect to use the equity method. A grace period or a stipulated effective date for the election of equity method could be set in the revised IAS instead of from the date of transition to IFRSs for those first-time adopters. It could allow entities to have sufficient time in gathering the relevant information.