

Public consultation: Fitness check on the EU framework for public reporting by companies

Fields marked with * are mandatory.

Introduction

This consultation is also available in [German](#) and [French](#).

Public reporting by companies¹ is based on a number of EU Directives, Regulations and Recommendations that were adopted at different points in time over the last 40 years. The current body of EU law (the "acquis") comprises a range of requirements applying to listed and non-listed companies, sector specific requirements (banks and insurers), as well as additional disclosure requirements applicable to listed companies. The initial Directive on annual accounts aimed at harmonising financial information to capital providers and for creditor protection. More recently, public reporting requirements have been expanded to non-financial reporting for a much broader audience.

The Commission is now conducting a comprehensive check of the fitness of the EU framework on public reporting by companies. The objectives of this fitness check are:

1. to assess whether the EU public reporting framework is overall still relevant for meeting the intended objectives, adds value at the European level, is effective, internally consistent, coherent with other EU policies, efficient and not unnecessarily burdensome;
2. to review specific aspects of the existing legislation as required by EU law²; and
3. to assess whether the EU public reporting framework is fit for new challenges (such as sustainability and digitalisation).

Throughout this consultation, certain concepts should be understood as follows:

- **Effectiveness** – whether an intended objective is met;
- **Relevance** – whether a requirement is necessary and appropriate for the intended objectives;
- **Efficiency** – whether the costs associated with the intervention are proportionate to the benefits it has generated;
- **Coherence** – whether requirements are consistent across the board;
- **Added value** – whether the EU level adds more benefits than would have been the case if the requirements were only introduced at the national level.

The Commission published an [action plan on financing sustainable growth](#) that builds on the [recommendations of the High Level Expert Group \(HLEG\) on sustainable finance](#). This fitness check on the EU framework for public reporting by companies is one of the actions announced in the Action plan. Several questions in this fitness check, in particular in the section on non-financial reporting, should be considered also in the context of the HLEG recommendations on sustainability.

The replies to this consultation will feed into a Staff Working Document on the fitness of the EU framework for public reporting by companies, to be published in 2019.


¹For this consultation "companies" mean limited liability companies of the types listed in the accounting Directive, companies that have issued securities on an EU regulated market, and banks or insurance companies including cooperatives and mutual structures.

²According to legislation, a series of reviews will have to be performed by the Commission:

- A report on the implementation of [Non-Financial Reporting Directive 2014/95/EU](#), addressing its scope, particularly as regards large non-listed undertakings, its effectiveness and the level of guidance and methods provided.
- A report on the situation of micro-undertakings having regard to the number of micro-companies and the reduction of administrative burdens resulting from the simplifications introduced in 2013.
- A report on the implementation and effectiveness of the Country-By-Country Reporting by extractive and logging industries, including examining the case for an extension of the Country-By-Country reporting to other sectors.
- A report on the 2013 Amendments to the Transparency Directive, considering the impact on small and medium-sized issuers and the application of sanctions.

Please note: In order to ensure a fair and transparent consultation process **only responses received through our online questionnaire will be taken into account** and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact fisma-public-reporting-by-companies@ec.europa.eu.

More information:

- [on this consultation](#)
- [on the protection of personal data regime for this consultation](#) 

1. Information about you

* Are you replying as:

- a private individual
- an organisation or a company
- a public authority or an international organisation

* Name of your organisation:

Deutsches Aktieninstitut e.V.

Contact email address:

The information you provide here is for administrative purposes only and will not be published

bremer@dai.de

* Is your organisation included in the Transparency Register?

(If your organisation is not registered, [we invite you to register here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#))

- Yes
- No

* If so, please indicate your Register ID number:

38064081304-25

* Type of organisation:

- Academic institution
- Company, SME, micro-enterprise, sole trader
- Consultancy, law firm
- Consumer organisation
- Industry association
- Media
- Non-governmental organisation
- Think tank
- Trade union
- Other

* In what category do you classify your company? (if applicable)

- Group with cross-border subsidiaries
- Group without cross-border subsidiaries
- An individual company
- Not applicable

* Where are you based and/or where do you carry out your activity?

Germany

* Field of activity or sector (*if applicable*):

at least 1 choice(s)

- | | |
|--|---|
| <input type="checkbox"/> Accommodation and food service activities | <input type="checkbox"/> Insurance |
| <input type="checkbox"/> Accounting | <input type="checkbox"/> Investment management (e.g. UCITS, hedge funds, private equity funds, venture capital funds, money market funds) |
| <input type="checkbox"/> Administrative and support service activities | <input type="checkbox"/> Manufacturing |
| <input type="checkbox"/> Agriculture, forestry and fishing | <input type="checkbox"/> Market infrastructure / operators (e.g. CCPs, CSDs, Stock exchanges) |
| <input type="checkbox"/> Arts, entertainment and recreation | <input type="checkbox"/> Mining and quarrying |
| <input type="checkbox"/> Auditing | <input type="checkbox"/> Pensions |
| <input type="checkbox"/> Banking | <input type="checkbox"/> Professional, scientific and technical activities |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Real estate activities |
| <input type="checkbox"/> Consumer protection | <input type="checkbox"/> Service provider |
| <input type="checkbox"/> Credit rating agencies | <input type="checkbox"/> Transportation and storage |
| <input type="checkbox"/> Digital | <input type="checkbox"/> Water supply, sewerage, waste management and remediation activities |
| <input type="checkbox"/> Electricity, gas, steam and air conditioning supply | <input type="checkbox"/> Wholesale and retail trade, repair of motor vehicles and motorcycles |
| <input type="checkbox"/> Human health and social work activities | <input checked="" type="checkbox"/> Other |
| <input type="checkbox"/> Information and communication | <input type="checkbox"/> Not applicable |


* Please specify your activity field(s) or sector(s):

Capital Markets Policy, Capital Markets Law, Company Law, Corporate Governance, Economic Literacy



Important notice on the publication of responses

* Contributions received are intended for publication on the Commission's website. Do you agree to your contribution being published?

([see specific privacy statement](#) )

- Yes, I agree to my response being published under the name I indicate (*name of your organisation /company/public authority or your name if your reply as an individual*)
- No, I do not want my response to be published

2. Your opinion

This consultation seeks stakeholder views on whether the EU framework for public reporting by companies is fit for purpose.

Considering the size of this public consultation please feel free to respond only to sections or questions of interest to you.

The questionnaire is structured as follows:

- [Assessing the fitness of the EU public reporting framework overall](#)
(Section I; Questions 1-7)
- [The EU financial reporting framework applicable to all companies](#)
(Accounting Directive: companies with cross border activities, SMEs, and content of the information) (Section II; Questions 8-18)
- [The EU financial reporting framework for listed companies](#)
(IAS regulation, Transparency Directive) (Section III; Questions 19-29)
- [The EU financial reporting framework for banks and insurance companies](#)
(Sectoral Accounting Directives) (Section IV; Questions 30-39)
- [Non-financial reporting framework](#)
(Non-Financial Reporting Directive, Country-by-Country Reporting for extractive and logging industries and integrated reporting) (Section V; Questions 40-56)

- [The digitalisation challenge](#)
(Section VI; Questions 57-66)
- [Other comments](#)
- [Acronyms and Abbreviations](#)

I. Assessing the fitness of the EU public reporting framework overall

Depending on its type, activity or situation, a company has a number of public reporting obligations under EU law. The current EU level public reporting framework considered for this consultation consists of the following:

- **Publication of individual and consolidated financial statements in accordance with national GAAP (Generally Accepted Accounting Principles)** by any limited liability company established in the EU. By virtue of the [Accounting Directive 2013/34/EU](#) Member States must ensure that any company in their jurisdiction with a legal form that limits its liability must prepare financial statements and a management report. These shall be audited / checked by a statutory auditor and published in the relevant business register according to national law that is compliant with this Directive. For companies other than a public-interest entity (bank, insurance company or company with securities listed), EU requirements are proportionate to the company's size.
- **Publication of consolidated financial statements in accordance with the International Financial Reporting Standard (IFRS) adopted** by the EU and other specific items by any company established in the EU that has securities (e.g. shares, bonds) listed on an EU regulated market by virtue of the [IAS Regulation \(EC\) No 1606/2002](#), the [Transparency Directive 2004/109/EC](#) and the [Market Abuse Regulation \(EU\) No 596/2014](#). The use of IFRS makes company accounts comparable within the single market and globally. Companies established in third countries may use their national standards (e.g. US GAAP) if these are accepted on the basis of EU equivalence decisions. The Transparency Directive (2004/109/EC) makes the issuers' activities more transparent, thanks to regular publication of yearly and half-yearly financial reports, as well as the publication of major changes in the holding of voting rights and ad hoc inside information which could affect the price of securities. Issuers have to file such information with the national Officially Appointed Mechanisms (OAMs).
- **Publication of individual and consolidated financial statements in accordance with sectoral layouts and principles** by any bank or insurance company in the EU by virtue of the [Bank Accounting Directive \(86/635/EEC\)](#) and the [Insurance Accounting Directive \(91/674/EEC\)](#). Unless they prepare IFRS financial statements, any bank or insurance company in the EU must publish financial statements in compliance with national accounting rules that are in line with these sectoral

Accounting Directives. Specific sectoral rules provide for, inter alia, layouts (balance sheet and Profit and Loss Account) and accounting treatments for e.g. loans, repurchase agreements or technical provisions.

- **Publication of non-financial information by any public-interest entity (bank, insurance company or listed company) with more than 500 employees** by virtue of [Directive 2014/95/EU](#). The information should be part of the management report, or published in a separate report. Non-binding guidance was issued in 2017 in order to assist companies – [Commission Communication C/2017/4234](#).
- **Publication of [country-by-country reports on payments to governments](#) by any large company that is active in extraction or logging** by virtue of Chapter 10 of [Accounting Directive 2013/34/EU](#) and Article 6 of [Transparency Directive 2004/109/EC](#). This fosters transparency on payments to governments, including third country governments, made in relation to these activities.

The table below provides an overview of the different objectives of the current EU framework mapped to individual legal instruments in the field of public reporting by companies:

MAIN OBJECTIVES	OPERATIONAL OBJECTIVES	EU LEGAL INSTRUMENTS				
		A D	IA S	T D	BA D	IA D
Stakeholder protection	→ Shareholder protection	X	X	X		
	→ Creditor protection	X				
	→ Depositor protection				X	
	→ Policy holder protection					X
Internal market	Facilitate:					
	→ Cross border investments	X	X	X	X	X
	→ Cross border establishment	X			X	X
Integrated EU capital markets	Market efficiency:					
	→ Access to capital	X	X	X		
	→ Capital allocation		X	X		

	→ Integrated securities market		X	X		
Financial stability	→ Public confidence in company reporting	X	X	X		
	→ Trust in the resilience of specific sectors (banking and insurance)				X	X
Sustainability	→ Enhanced corporate responsibilities / accountability/ good corporate governance	X		X		
	→ Empower stakeholders	X		X		
	→ Foster globally sustainable activities	X				
	→ Foster long term investments	X				
	→ Fight corruption	X		X		

* Accounting Directive (AD); IAS regulation / IFRS (IAS); Transparency Directive (TD); Bank accounts Directive (BAD); Insurance Accounts Directives (IAD)

General questions

Question 1. Do you think that the EU public reporting requirements for companies, taken as a whole, have been **effective** in achieving the intended objectives?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Ensuring stakeholder protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing the internal market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Promoting integrated EU capital markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring financial stability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 1 and substantiate it with evidence or concrete examples:

The very objective of reporting requirements for companies should be to allow investors a true and fair view on business development so that they are able to make informed decisions. We would agree that there is a need of a reporting framework to ensure this objective and to ensure that this framework is harmonised across the EU. The EU regulations have served this objective. However, our general perception is that reporting has become increasingly detailed and resulted in additional burdens for listed companies as well as an information overload for investors. However, we strongly any additional requirement would not be feasible anymore for preparers.

Against this background, we feel that the questionnaire does not appropriately address these kind of problems (with some minor exemptions, see e.g. Q 13), but rather starts a debate on additional reporting requirements and less flexibility for listed companies. In the same vein, additional objectives of reporting (such as financial stability or promoting sustainability) are introduced. As we miss the clear intention to review the framework against the level of bureaucracy created, we are concerned that the fitness check could take the wrong direction. We would therefore rather prefer an open and neutral discussion about which scope of regulation is necessary and comparable with other global financial markets so that European companies are not put at a competitive disadvantage.

Question 2. Do you think that the EU public reporting requirements for companies, taken as a whole, are **relevant** (necessary and appropriate) for achieving the intended objectives?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Ensuring stakeholder protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Developing the internal market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting integrated EU capital markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ensuring financial stability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 2 and substantiate it with evidence or concrete examples of any requirement that you think is not relevant:

Please refer to our answer to question 1.

It is not easy to answer this question, because “relevance” may have a different meaning than “appropriate and necessary”. Though we agree that there is a need for a certain level of reporting requirements to ensure investor information and a level playing field across Europe, the questionnaire does not appropriately reflect the problems of increasing bureaucracy and information overload. Also, we miss a debate on what should be the key objectives of reporting.

Question 3. Companies would normally maintain and prepare a level of information that is fit for their own purposes, in a "business as usual situation". Legislation and standards tend to frame this information up to a more demanding level.

With regards to the objectives pursued, do you think that the EU legislation and standards on public reporting are **efficient** (i.e. costs are proportionate to the benefits generated)?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 3 and substantiate it with evidence or concrete examples of requirements that you consider most burdensome:

We do not believe that EU legislation and standards on public reporting are efficient. Cost-benefit analyses in EU legislation and standards regularly underestimate the costs for preparers to a substantial degree, while often providing only qualitative, unmeasurable descriptions of benefit for the users.

Question 4. If you are a preparer company, could you please indicate the **annual recurring costs** (in € and in relation to the total operational cost) incurred for the preparation, audit (if any) and publication of mandatory public reporting:

Total amount in Euros of annual recurring costs for mandatory public reporting:

Amount as a % of total operating costs of annual recurring costs for mandatory public reporting:

 %

Coherence

Question 5. Do you agree that the intrinsic coherence of the EU public reporting framework is fine, having regard to each component of that reporting?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Financial statements (preparation, audit and publication)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Management report (preparation, consistency check by a statutory auditor, publication)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-financial information (preparation, auditor's check and publication)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Country-by-country reporting by extractive / logging industries (preparation, publication)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 5 and substantiate it with evidence or concrete examples:

See response to question 1.

Question 6. Depending on circumstances, a company may have public reporting obligations on top of those being examined here. Such legislation may have been developed at the EU³, national or regional level. Should you have views on the interplay of these additional reporting obligations with the policies examined in this consultation, please comment below and substantiate it with evidence or concrete examples.

³ For example, under the Shareholders' Rights Directive 2007/36/EC, companies must publicly announce material transactions with related parties, establish remuneration policy and draw up a remuneration report for the attention of the shareholders, etc. Under the Directive on Capital Requirements for banks (2013/36/EU, Art. 96) banks must maintain a website explaining how they comply with corporate governance requirements, country by country reporting and remuneration requirements. The Solvency II Directive (2009/138/EC) requires Insurance and reinsurance undertakings to publish their Solvency and Financial Condition Report. A prospectus, regulated by the Prospectus Directive (2003/71/EC) and Regulation ((EU) 2017/1129) is a legal document that describes a company's main line of business, its finances and shareholding structure. As regards Market Abuse Directive and Regulation, see specific questions further down.

On the one hand, individual national regulations may create additional burdens for the companies. For example, in Germany regulations for the management report are very detailed compared to other EU member states, which leads to duplicating disclosures in the management report and the consolidated financial statements (e.g. risk reporting).

On the other hand, this does not create a case for harmonizing on the EU level, but should be addressed on national level taking into account the legislative history of the respective member states.

EU Added value

Question 7. Do you think that, for each respective objective, the EU is the right level to design policies in order to obtain **valuable results**, compared to unilateral and non-coordinated action by each Member State?

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	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Ensuring stakeholder protection	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing the internal market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting integrated EU capital markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring financial stability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 7 and substantiate it with evidence or concrete examples:

Most of the objectives are certainly better addressed by multilateral action than by unilateral action. However, the question is whether the EU level is necessarily the appropriate multilateral level. Close coordination between nations with markets of global importance would be more effective to ensure a level playing field. This is particularly true for Accounting standards: IFRS are and should be globally accepted. See also answer to Q 19.

However, the decisive question is whether all of the objectives should be of equal relevance for policy action at all. Though we would agree that reporting requirements should serve the objective of investor protection and it is far less clear for promoting sustainability – not least because the term “sustainability” is vague and needs to be defined before a proper judgement is possible.

II. The financial reporting framework applicable to all EU companies

The financial reporting framework for any EU company is broadly shaped by the Accounting Directive. Member States' accounting laws, regulations and standards for the preparation of annual accounts (national GAAP) must incorporate the provisions of the Accounting Directive. The Accounting Directive includes financial statements (balance sheet, profit or loss statement, and notes to the accounts) as well

as a management report, depending on the size of the company. Several Member States allow or require the use of IFRS instead of national GAAP for the preparation of annual financial statements. But even when a company prepares financial statements using IFRS, many requirements from the Accounting Directive still apply such as the management report, statutory audit or publication (for further details, see the [guidance on Interaction between IFRS reporting and other EU accounting rules](#)).

Companies operating cross-border

Companies often structure their cross-border business activities within the EU by establishing local entities in a host Member State controlled by a parent established in the home Member State. Together they form a group of controlled entities. Even though a group usually acts and is seen as a single economic entity, EU law does not recognise the legal personality of a group. Nevertheless, EU law addresses certain specific group situations, for instance, by requiring the preparation of consolidated financial statements as if the group were a single entity ([Accounting Directive 2013/34/EU](#), [IAS Regulation \(EC\) No 1606/2002](#)), structuring bankruptcy ([Regulation \(EU\) 2015/848 on insolvency proceedings](#)) or implementing sectoral regulatory supervision ([Capital Requirement Directive](#) and [Capital Requirement Regulation \(banks\)](#), [Solvency Directive \(Insurance\)](#)).

When doing cross border business, a group usually faces a variety of business, tax and legal environments. These differences tend to hinder the application of consistent policies and procedures within a group and weaken the comparability of financial statements for users.

Some of these differences arise from options or lacunas in the Accounting Directive or the way in which Member States have complemented the minimum European accounting requirements. For example, the Accounting Directive does not address some economically important transactions such as lease contracts, foreign currency transactions, government grants, cash flows statements, income recognition or deferred taxes. These lacunas are addressed by each Member States in their own way.

More recently the Commission has proposed to harmonise the basis for the taxation of corporate profits for certain groups by ways of a proposal for a Directive on a Common Corporate Tax Base (CCTB) ([COM\(2016\)685 final](#)). It also seeks to organise the free flow of non-personal data by ways of a proposal for a Regulation on a framework for the free flow of non-personal data in the European Union ([COM\(2017\)495](#)), which would legally enable centralised storage and processing of the group's non-personal data by removing unjustified data localisation restrictions within the EU.

Question 8. In your view, to what extent do the addition of, and differences in, national reporting rules hinder the ability of companies to do cross border business within the EU single market?

- Differences seriously hinder the ability to do business within the EU
- Differences hinder to some extent
- Differences do not hinder the ability to do business within the EU / are not significant
- Don't know / no opinion / not relevant

Please explain your response to question 8 and substantiate it with evidence or concrete examples:

National reporting rules do not hinder the ability of companies to do cross border business within or outside the EU. This is proven by the substantial business of EU companies with other parts of the world where other accounting standards apply.

Investment decisions, including cross-border investments in other jurisdictions, are based on the underlying economics, in particular the expectation of increasing future cash flows from the investment. Accounting and financial/corporate reporting as the tool to reflect these economics in a company's books and records play a subordinate role in these decisions. Nevertheless, it is important that these cash flows are defined (as in IFRS 7).

Question 9. To what extent to you think that the following differences, because they affect public reporting by companies, are significant impediments to cross-border establishment in the EU?

Areas covered by EU requirements

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Differences and lacunas in accounting standards or principles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences in corporate governance standards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences and overlaps arising from the presentation of the financial statements (balance sheet, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences arising from publication rules / filing with business registers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(publication deadlines, publication channels, specifications)						
Differences arising from audit requirements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences arising from dividends distribution rules or capital maintenance rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Areas not covered by EU requirements

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Differences arising from specific bookkeeping requirements such as charts of accounts, audit trail requirements, data storage and accessibility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences arising from language requirements (Bookkeeping documentation, publication of financial statements)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences arising from the determination of taxable profit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Differences arising from digital filing requirements (for instance taxonomies used)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences arising from software specifications	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other differences (please rate here and specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 9 and substantiate it with evidence or concrete examples:

The cross-border establishment of business in other jurisdictions is based on the underlying economics resulting in future cash flows from the investment. Differences in reporting do not restrict this cross-border establishment. Otherwise there would be no substantial cross-border business within the EU and with other parts of the world.

Question 10. How do you evaluate the impact of any hindrances to cross border business on costs relating to public reporting by companies?

- The impact of hindrances on costs are negligible or not significant
- The impact of hindrances on costs are somehow significant
- The impact of hindrances on costs are very significant
- Don't know / no opinion / not relevant

Please explain your response to question 10 and substantiate it with evidence or concrete examples:

See Response to Q9.

Question 11. On top of differences in national accounting rules, national tax laws will usually require the submission of a tax return in compliance with self-standing national tax rules, adding another layer of reporting standard.

Once a Common Corporate Tax Base is adopted at the EU level, would you consider that the profit before tax reported in the Profit or Loss statement and the determination of the taxable profit should be further aligned across EU Member States?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 11 and substantiate it with evidence or concrete examples:

N/A.

Question 12. As regards the **preparation of consolidated and individual financial statements** how do you assess the ability of the following approaches to reduce barriers to doing business cross-borders?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
The EU should reduce the variability of standards from one Member State to another through more converged national GAAPs, possibly by removing options currently available in the EU accounting legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU should reduce the variability of standards from one Member State to another by converging national GAAPs on the basis of a European Conceptual Framework	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU should reduce the variability of standards from one Member State to another by converging national GAAPs and in addition by addressing current lacunas in the Accounting Directive (leases, deferred taxes, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The EU should reduce the variability of standards from one Member State to another by establishing a "pan-EU GAAP" available to any company that belongs to a group. Such "pan-EU GAAP" may be the IFRS, IFRS for SMEs, or another standard commonly agreed at the EU level.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do nothing (status quo)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other approaches (please rate here and specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 12 and substantiate it with evidence or concrete examples:

The EU should preserve the status quo including the options provided for member states. A harmonization of national GAAPs would take a long period of time and would be extremely costly though providing little to no benefit to companies and investors. With the BilMoG in Germany, local GAAP was already adapted to IFRS in 2009, what shows that national action is sufficient for national GAAP.

Question 13. As regards the publication of individual financial statements, the Accounting Directive (Article 37) allows any Member State to exempt the subsidiaries of a group from the **publication of their individual financial statements** if certain conditions are met (inter alia, the parent must declare that it guarantees the commitments of the subsidiary). Would you see a need for the extension of such exemption from a Member State option to an EU wide company option?

- Yes
- No
- Don't know / no opinion / not relevant

Please explain your response to question 13 and substantiate it with evidence or concrete examples:

Though we are not in favour of a review of the Accounting Directive including the existing options this might be one of the few concrete measures where EU action could be beneficial because it could relieve companies from extra work.

SMEs

Since 2016, EU law requires small companies to prepare and publish **only** a balance sheet, a profit or loss statement and a few notes, thanks to the harmonisation agreed at the EU level. Each Member State may fine-tune this regime as regards the level of detail in the balance sheet or profit and loss, and as regards the need for an audit or for a management report. In addition Member State can simplify even further the regime of micro companies and bring it down to only a super simplified balance sheet, a super simplified profit or loss statement and lightweight publication regime. The Member States have used these possibilities to varying extents. The Commission has commissioned a consortium led by the Centre for European Policy Studies (CEPS) to conduct a study on the accounting regime of micro companies with limited liability (FISMA/2017/046/B)). These simplifications are not available to banks, insurance companies or listed companies which are considered as public-interest entities.

Question 14. Do you agree that the EU approach is striking the right balance between preparers' costs and users' needs, considering the following types of companies?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Medium-sized	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Small	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Micro	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 14 and substantiate it with evidence or concrete examples:

N/A.

Question 15. EU laws usually define size categories of companies (micro, small, medium-sized or large) according to financial thresholds. Yet definitions may vary across EU pieces of legislation. For instance, the metrics of size-criteria for a micro-company in the Accounting Directive (for the financial statements) differ from those in the Commission Recommendation 2003/361/EC ([Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises](#) (for the support by certain EU business-support programmes). For instance, the turnover may not exceed €700,000 for micro-companies in the Directive whereas it may not exceed €2,000,000 in the Recommendation).

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
In general, should the EU strive to use a single definition and unified metrics to identify SMEs across all the EU policy areas?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In particular, should the EU strive to align the SME definition metrics in the Accounting Directive with those in Recommendation 2003/361/EC?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 15 and substantiate it with evidence or concrete examples:

N/A.

Relevance of the content of financial reporting

A company’s financial statement, together with the management report and related documents (corporate governance report, non-financial information) aim to provide a reliable picture of a company’s performance and financial position at the reporting date. However, certain users argue that financial statements give only an image of the (recent) past and lack forward-looking information (see for instance [Conference Shaping the future of corporate reporting, panel 5 – Matching expectations with propositions, investors' views](#)). The financial statements may also fail to provide a complete picture of the long term value creation, business model, cash flows (non-IFRS financial statements) and internally generated intangible assets (See for instance [expert group's report on Intellectual Property Valuation, 2013](#)). There is also only scarce information required at the EU level on dividend distribution policies and risks (see for instance the [UK FRC Lab](#)). The search for other sources of information to remedy this situation may increase costs for users and undermine the level playing field.

Question 16. How do you think that the current EU framework as regards the content of financial reporting is relevant (necessary and appropriate), having regards to the following information:

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
A company's or group's strategy, business model, value creation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A company's or group's intangible assets, including goodwill,						

irrespective of whether these appear on the balance sheet or not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A company's or group's policies and risks on dividends , including amounts available for distribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A company's or group's cash flows	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 24 and substantiate it with evidence or concrete examples:

Please explain, including if in your view additional financial information should be provided:

Please also refer to our answer to question 1.

It is not easy to answer this question, because “relevance” may have a different meaning than “appropriate and necessary”. Though we agree that there is a need for certain level of reporting requirements to ensure investor information and a level playing field across Europe, we also feel that bureaucracy in reporting has increased and there is a growing information overload.

Question 17. Is there any other information that you would find useful but which is not currently published by companies?

- Yes
- No
- Don't know / no opinion / not relevant

Question 18. Financial statements often contain alternative performance measures such as t h e E B I T D A. (An APM is a financial measure of historical or future financial performance, financial position, or cash flows, other than a financial measure defined or specified in the applicable financial reporting framework.)

Do you think that the EU framework should define and require the disclosure of the most commonly used alternative performance measures?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 18 and substantiate it with evidence or concrete examples:

The EU framework should not define and require the disclosure of the most commonly used alternative performance measures. Alternative performance measures are always company-specific because they incorporate the particular environment of the company as well as the management's approach. Thus, mandatory APMs will most likely not be suitable for application in many cases. Even worse, issuers were forced to make public non-relevant and /or material information, which would rather reduce transparency.

In our opinion, it is decisive that companies properly explain their KPIs and provide appropriate reconciliations to IFRS figures., as this is required by the "ESMA Guidelines on Alternative Performance Measures" Introducing additional performance measures in yet an additional reporting framework outside IFRS will, in our opinion, not limit the use of alternative performance measures, but simply change the extent of the reconciliation, while causing confusion as stakeholders have to get familiar with yet more guidance on the European level.

III. The EU financial reporting framework for listed companies

The IAS Regulation and International Financial Reporting Standards (IFRS)

The IAS Regulation adopted in 2005 made the use of IFRS mandatory for the consolidated accounts of listed companies. The [Commission Evaluation of the IAS Regulation in 2015](#) found that the use of IFRS had led to greater transparency and comparability of financial reporting within the single market, but that complexity had increased. It also concluded that the use of IFRS in the EU has significantly increased the credibility of IFRS and its use worldwide.

However, the current level of commitment to IFRS by third country jurisdictions differs significantly. Very few of the major capital markets and large jurisdictions have made the use of IFRS as issued by the IASB mandatory⁴. As a result, the level of global convergence achieved is sub-optimal compared to the initial objective on global use.

Before becoming EU law IFRSs have to be endorsed to ensure that they meet certain technical criteria, are not contrary to the true and fair view principle, and are conducive to the European public good⁵. The current endorsement process prevents the Union from modifying the content of the standards issued by the IASB. Some stakeholders, as mentioned in the [final report of the High-Level Expert Group \(HLEG\)](#),

are concerned that this lack of flexibility would prevent the EU from reacting if these standards were to pose an obstacle to broader EU policy goals such as long-term investments and sustainability.

The IASB is addressing the complexity of the standards and the volume of disclosure requirements as part of its ["Better Communication" project](#). In addition, the Commission will continue to monitor progress on IASB commitment to improve disclosure, usability and accessibility of IFRS (see the [Communication on the Mid-Term Review of the Capital markets Union Action Plan](#)). This initiative is one of the actions set in motion by the Commission in order to make it easier for companies to enter and raise capital on public markets, notably on [SME Growth Markets](#).

⁴ As per the Pocket guide to IFRS standards 2017 published by the IFRS Foundation: Very few of the major capital markets and large jurisdictions require the use of IFRS as issued by the IASB. Some allow the use of IFRS by any listed company, or restrict the option to third country issuers. Many others have transposed IFRS into national GAAP which then become "substantially converged" with IFRS issued by the IASB. Several jurisdictions require IFRS as issued by the IASB albeit often relabelled as national GAAP.

⁵ The IAS Regulation does not define the criterion "European public good". As a result the Commission has so far followed a [pragmatic approach that allows identification of key matters of concern on a case by case basis](#).

Question 19. Given the different levels of commitment to require IFRS as issued by the IASB around the globe, is it still appropriate that the IAS Regulation prevents the Commission from modifying the content of IFRS?

- Yes
- No, due to the risk of uneven level playing field for EU companies vis-à-vis companies established in third countries that do not require the use of IFRS as issued by the IASB.
- No, due to the risk that specific EU needs may not properly be addressed during the IASB standard setting process.
- No, due to other reasons.
- Don't know / no opinion / not relevant

Question 20. Since the adoption of IFRS by the EU in 2005, topics such as sustainability and long-term investment have come to the forefront of the regulatory agenda. Is the EU endorsement process appropriate to ensure that IFRS do not pose an obstacle to broader EU policy objectives such as sustainability and long-term investments?

- Yes
- No
- Don't know / no opinion / not relevant

Question 21. How could the EU ensure that IFRS do not pose an obstacle to sustainability and long-term investments:

- By retaining the power to modify the IFRS standards in well-defined circumstances;
-

By making explicit in the EU regulatory framework that in order to endorse IFRS that are conducive to the European public good, sustainability and long term investment must be considered;

- Other
- Don't know / no opinion / not relevant

Please specify in what other ways could the EU ensure that IFRS do not pose an obstacle to sustainability and long-term investments:

As the status quo of the IFRS does not interfere with the above mentioned objectives nothing should be done.

Question 22. The True and Fair view principle should be understood in the light of the general accounting principles set out in the Accounting Directive . By requiring that, in order to be endorsed, any IFRS should not to be contrary to the true and fair view principle, a link has been established between IFRS and the Accounting Directive. However, the principle of true and fair view is not laid down in great detail in the Accounting Directive, nor is it underpinned by e.g. a European Conceptual Framework that would translate these principles into more concrete accounting concepts such as recognition and measurement, measurement of performance, prudence, etc. Do you think that an EU conceptual framework should underpin the IFRS endorsement process?

- Yes
- No
- Don't know / no opinion / not relevant

If you answered no to question 22, please explain your position:

Due to the online-tool restrictions it is not possible to provide comments to questions 19 or 20 in case the questions are answered with "yes". Therefore, it is the only possibility to capture remarks for those questions under question 22.

With regard to question 19-20 we strongly oppose any interventions by the EU because allowing deviations from IFRS "as issued" by the IASB may set an uncontrollable and unpredictable trend that would lead to creating European rather than global standards. The objective of global accounting standards to have a comparable framework for globally active companies would be jeopardized and could ultimately become obsolete. This is neither in the interest of the preparers nor the users of financial statements.

Modified IFRS may cause problems and additional costs for companies that use capital markets outside Europe, especially in the U.S. Whereas financial statements according to IFRS "as issued" by the IASB are accepted by the SEC, this is not the case for EU-specific IFRS. The future acceptance of EU-specific IFRS by the SEC or the need for reconciliations to US-GAAP is unclear. This would isolate Europe from global capital markets, may hinder investments because comparability is key for global investors when allocating capital.

IFRS are developed following a due process that includes extensive consultations with stakeholders. The European Union and its institutions should voice any concerns about new or amended standards during the well-established due process, but should refrain from taking any actions other than endorsements once the final standards have been published.

The current full EU commitment to IFRS "as issued" by the IASB already leads to sufficient influence of the EU in the standard setting process. This may not be the case when the IASB knows that the EU can modify a standard when it is incorporated into EU law.

The current endorsement process of IFRS in EU law is important to demonstrate the strength of the EU. The goal must be that the IASB takes concerns by the EU seriously during the regular standard setting process.

Adding additional endorsement criteria may increase the likelihood of non-endorsement of standards. Moreover, they are also rather vague, thus open for lobbying.

We also do not see any evidence that the IFRS hinder sustainable and long-term investments. Financial reporting should serve principally to inform shareholders and creditors and enable them to make investment decisions. We think that the EU should promote long-term investments rather through economic environment, availability of adequate sources of long-term equity and debt than through accounting standards. Accounting standards are not an effective economic policy tool. Financial reporting should maintain its neutrality and objectivity to best serve the needs of investors.

With regard to question 22 an EU conceptual framework should definitely not underpin the IFRS endorsement process. The EU should not create an additional layer of regulatory interventions. In connection with additional endorsement criteria, divergence from international norms may almost be guaranteed. This is neither in the interest of the preparers nor the users of financial statements.

An EU conceptual framework would create regional rules and thus contradicts the goal of globally applied accounting standards. The EU has decided to prescribe IFRS as the EU-wide standards for capital market-oriented parent companies. The incorporation into EU law takes place through the endorsement process. If this was extended by an EU conceptual framework, a further increase in bureaucratization is to be feared. We see no evidence that the true-and-fair-view principle is not adequately described in the Accounting Directive. Therefore, no further concretization is needed.

Question 23. The EU has not endorsed the IASB Conceptual Framework for Financial Reporting. The conceptual framework is a set of concepts used to develop IFRSs but can also be helpful in interpreting how IFRS standards have to be understood and applied in specific circumstances. This could enhance a common application of IFRSs within the EU.

Should the EU endorse the IASB Conceptual Framework for Financial Reporting?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree

Don't know / no opinion / not relevant

Please explain your response to question 23 and substantiate it with evidence or concrete examples:

We do see no need for incorporation in EU law. Of course, some IFRS use references to the Conceptual Framework. However, it is primarily addressed to the IASB and the IFRS Interpretation Committee and only secondarily to the preparers. Its primary purpose is to support the IASB and the IFRS IC in its work.

Question 24. Contrary to the Accounting Directives the EU endorsed IFRSs do not require companies to present financial information using a prescribed (minimum) lay-out for the balance sheet and income statement. Mandatory use of minimum layouts could enhance comparability of human readable financial statements (Electronic structured data reporting based on the IFRS taxonomy have an implicit layout as relationships between elements for which amounts shall be presented are defined).

Do you agree that prescribed (minimum) layouts enhance comparability of financial statements for users and should therefore be introduced for companies using IFRS.

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 24 and substantiate it with evidence or concrete examples:

The variety observed in companies' financial reporting is a proper reflection of today's complexities in economic circumstances, business models and environments, industry branches, etc. Items in the financial statements that are material to certain companies in certain industries (e.g. property, plant and equipment for manufacturing companies or financial instruments for banks and insurance companies) may have little or no relevance to companies of other sizes and industries. A "one size fits all" approach like a prescribed minimum layout would merely result in the appearance of comparability, when in fact the underlying economics do not justify providing the same importance to items that are different.

In our opinion, comparability over time is more important than comparability between companies. This comparability over time is, however, currently diluted due to the continuous introduction of new accounting and reporting regulation by the EU and the IASB.

Transparency Directive

The Transparency Directive requires issuers of securities traded on regulated markets within the EU to ensure appropriate transparency through a regular flow of information to the markets. The Transparency Directive was last amended in 2013 in order:

- To reduce the administrative burden on smaller issuers and promote long-term investment by abolishing the requirement to publish quarterly financial reports and,
- To strengthen investor protection by improving the efficiency of the disclosure regime of major holdings of voting rights, particularly regarding voting rights held through derivatives.

Question 25. Do you agree that the Transparency Directive requirements are **effective** in meeting the following objectives, notably in light of increased integration of EU securities markets?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Protect investors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contribute to integrated EU capital markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate cross border investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 25 and substantiate it with evidence or concrete examples:

The merit of the EU Transparency Directive is that it has harmonised the frequency of reporting and the dissemination of regulated information across Europe, so that investors can trust in that they receive regulated information from listed companies in Europe, irrespective of where they are listed. Though this contributed to investor protection and the integration of European capital markets, the TD unfortunately also is about to introduce iXBRL as the ESEF. iXBRL will not further improve investor protection or the integration of markets, but increase costs and risks for listed companies. See also our responses to Q 57ff.

Question 26. Do you agree that abolishing the quarterly reporting requirement in 2013 by issuers contributed to the following?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Reducing administrative burden, notably for SMEs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting long-term investment (i.e. discouraging the culture of short-termism on financial markets).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting long-term and sustainable value creation and corporate strategies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Maintaining an adequate level of transparency in the market and investors' protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your response to question 26 and substantiate it with evidence or concrete examples:

The abolishment of the quarterly reporting requirement is fully supported. It provides companies with the opportunity to provide customized information that is relevant to investors without being required to disclose irrelevant information. The real merit of the abolishment therefore is that issuers regained flexibility to adjust their quarterly reporting practices to investors' demand. Indeed, many issuers still provide detailed financial results on a quarterly basis but not in the format of a quarterly report. Overall, our experience shows that transparency has not deteriorated, but rather has improved.

However, we feel not able to evaluate the effect on short-termism and sustainable value creation, because we would not agree that short-termism had been widespread among listed companies before the abolishment of quarterly reporting.

Question 27. Do you consider that the notifications of major holdings of voting rights in their current form is **effective** in achieving the following?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Strengthening investor protection	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preventing possible market abuse situations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your response to question 27 and substantiate it with evidence or concrete examples:

Major holdings notifications are an important element of investor protection because they allow investors to adjust to their behaviour to significant changes in the ownership structure of a listed company. In addition, the latest amendments to the TD closed relevant loopholes in the regime that allowed for hidden stock building using cash settled derivatives and similar techniques. Thus, we believe that abusive situations are now by-and-large captured.

However, we feel that the new regime has resulted in rather complex notification so that they are not easy to understand and transparency is limited in that respect. The EU should therefore evaluate ways of reducing complexity without opening loopholes again.

Question 28. Do you agree that the disclosure and notification regime of major holdings of voting rights in the Transparency Directive is overall **coherent** with the following EU legislation?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Coherent with EU company law	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Coherent with the shareholders' rights directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Coherent with the obligation to disclose managers' transactions under Article 19 of the Market Abuse Regulation (Article 19(3) of MAR sets out the following disclosure obligations: The issuer (...) shall ensure that the information [on transactions carried out by managers or persons closely associated to the managers] is made public promptly and no later than three business days after the transaction in a manner which enables fast access to this information on a non-discriminatory basis)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coherent with other EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please specify with what other EU legislation the disclosure and notification regime of major holdings of voting rights is overall coherent:

Please explain your response to question 28 and substantiate it with evidence or concrete examples:

We are not aware of any incoherence with regard to the legislative acts.

With regard to MAR we, however, feel that recital (58) wrongly also mentions changes in ownership as of the objectives of the regime to notify managers' transactions according to Art. 19 MAR. The very objective of managers' transactions is, instead, signalling the market whether the management's may have changed expectations with regard to the future prospects of the company in question.

Question 29. As regards the following areas, did you identify a lack of coherence of legislation from one Member State to another that could jeopardise to some extent the objectives of investor protection, integrated capital markets and cross-border investment?

- Yearly and half-yearly financial information
- On-going information on major holdings of voting rights
- Ad hoc information disclosed pursuant to the Market Abuse Directive
- Administrative sanctions and measures in case of breaches of the Transparency Directive requirements
- Don't know / no opinion / not relevant

Please explain your response to question 29 and substantiate it with evidence or concrete examples:

N/A.

Question 30. Should anything be done to improve public reporting by listed companies (documents, information, frequency, access, harmonisation, simplification)?

Generally, it should be an objective to reduce complexity and burdensome processes for listed companies. In particular, comparability of corporate reporting over time is important for both preparers and users. It is currently diluted due to the continuous introduction of new accounting and reporting regulation by the EU and the IASB.

IV. The EU financial reporting framework for banks and insurance companies

Bank Accounts Directive (BAD)

All banks (credit institutions) and groups of banks established in the EU - irrespective of their legal form - have to prepare and publish annual financial statements in order to achieve comparability of financial statements. Member State accounting laws, regulations and standards for the preparation of banks' financial statements must incorporate EU law on bank accounting: the Bank Accounts Directive (BAD) adopted in 1986.

Following the endorsement of IFRS by the EU in 2002 all large banks, accounting for more than 65% of total European banking assets, are obliged to use EU endorsed IFRS for their consolidated financial statements. In addition to the mandatory use of IFRS for the consolidated accounts by listed banks, 15 Member States currently require IFRS for the consolidated accounts of non-listed banks and 12 Member States *require* IFRS for the individual accounts of non-listed banks instead of national GAAP (See for more details the table on [page 64 of the Staff Working Document on the evaluation on the IAS Regulation](#))

The use of IFRS has reduced the relevance of the Bank Accounts Directive for achieving harmonised financial statements. The BAD has also lost relevance over time as it has not been updated to include more recent accounting treatments, for example on expected credit losses, (operational) leases or revenues from digital business models.

Harmonising banks' financial statements is not only important for the comparability of banks' financial statements. Bank prudential requirements and capital ratios are based on accounting values. Differences between national GAAPs or between national GAAPs and IFRS lead to different prudential outcomes, which hamper the comparability of capital ratios.

Question 31. Do you agree with the following statements:

	1	2	3 (partially disagree)	4	5	Don't know / no opinion /
--	---	---	---------------------------	---	---	---------------------------

	(totally disagree)	(mostly disagree)	and partially agree)	(mostly agree)	(totally agree)	not relevant
The BAD is still sufficiently effective to meet the objective of comparability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The BAD is still sufficiently relevant (necessary and appropriate) to meet the objective of comparability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs associated with the BAD are still proportionate to the benefits it has generated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The current EU legislative public reporting framework for banks is sufficiently coherent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 31 and substantiate it with evidence or concrete examples:

N/A.

Question 32. Do you agree with the following statement:

The BAD could be suppressed and replaced by a requirement for all EU banks to use IFRS 1.

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 32 and substantiate it with evidence or concrete examples:

N/A.

Question 33. Do you think that the objective of comparability of financial statements of banks using national GAAP could be improved by including accounting treatments in the BAD for:

	Yes	No	Don't know / no opinion / not relevant
Expected Credit risk provisioning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Leases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intangible assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Derivatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 33 and substantiate it with evidence or concrete examples:

N/A.

Question 34. Do you agree with the following statement:

The current **number of options** in the BAD may hamper the comparability of financial statements and prudential ratios 1.

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree

Don't know / no opinion / not relevant

Please explain your response to question 34 and substantiate it with evidence or concrete examples:

N/A.

Question 35. Do you agree with the following statements:

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Mandatory use of national GAAPs for the preparation of individual financial statements of bank subsidiaries reduces the efficiency of preparing consolidated financial statements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allowing the use of IFRS for the preparation of individual financial statements by (cross border) banking subsidiaries, subject to consolidated supervision, would increase efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 35 and substantiate it with evidence or concrete examples:

N/A.

Question 36. Do you agree with the following statement:

Cross border bank subsidiaries of an EU parent should be allowed not to publish individual financial statements subject to

1. being included in the consolidated financial statements of the group,
2. consolidated supervision and
3. the parent guaranteeing all liabilities and commitments of the cross border subsidiary?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 36 and substantiate it with evidence or concrete examples:

N/A.

Insurance Accounting Directive (IAD)

The Directive on the annual and consolidated accounts of insurance undertakings was adopted in 1991 in order to set a common European Framework consistent with the Accounting Directive. Where applicable, its scope includes the statutory accounts, which implies a strong interplay with National Legal Frameworks pertaining to insurance contract obligations, dividend distribution, taxation and prudential requirements applicable to small entities outside the scope of the Solvency II Directive.

Unlike in the banking sector where prudential requirements and ratios are based on accounting values, the Solvency II Directive applicable from 2016 includes dedicated measurement principles and public disclosure requirements independent from accounting standards.

IFRS 17 "insurance contracts" was issued by the IASB in May 2017 and should apply from 2021 onwards to the consolidated financial statements of listed companies (and to other companies depending on Member States options). In the context of the European endorsement process of IFRS 17, consultations have highlighted concerns that some provisions of IFRS 17 might contradict the Insurance Accounting Directive and that the interaction between IFRS 17 and Solvency II public disclosure requirements may duplicate information.

Overall depending on Member States' use of options, the European accounting and prudential framework requires listed insurance groups to prepare multiple sets of financial statements (Statutory accounts as per National GAAPs, Solvency and Financial Condition Report under the Solvency II Directive and IFRS financial statements for consolidation purpose). This possibility of overlaps between the various pieces of legislation potentially affects their relevance, efficiency and consistency.

Question 37. Do you agree with the following statements:

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
The Insurance Accounting Directive meets the objective of comparable financial statements within the European insurance industry (the Insurance Accounting Directive is effective)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Insurance Accounting Directive is still sufficiently relevant (necessary and appropriate) to meet the objective of comparable financial statements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs associated with the Insurance Accounting Directive are still proportionate to the benefits it has generated (the Insurance Accounting Directive is efficient)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 37 and substantiate it with evidence or concrete examples:

N/A.

Question 38. Do you agree with the following statements:

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
There are contradicting requirements between the IAD and IFRS 17 which prevent Member States from electing IFRS 17 for statutory and consolidated accounts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Insurance Accounting Directive should be harmonized with the Solvency II Framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Insurance Accounting Directive should be harmonized with the IFRS 17 Standard	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preparers should be allowed to elect for a European-wide option to apply Solvency II valuation principles in their financial statements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 38 and substantiate it with evidence or concrete examples:

N/A.

Question 39. Do you think that the current prudential public disclosure requirements and general public disclosure requirements applicable to insurance and reinsurance undertakings are **consistent** with each other?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
For European insurance and reinsurance companies under the scope of the mandatory application of IFRS according to the IAS regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For European insurance and reinsurance companies required to apply IFRS according to Member States options	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For European insurance and reinsurance companies not required to apply the IFRS Standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 39 and substantiate it with evidence or concrete examples:

N/A.

V. Non-financial reporting framework

Non-Financial Reporting Directive

Directive 2014/95/EU on disclosure of non-financial Information and diversity information (the NFI Directive) requires around 6.000 large companies with more than 500 employees listed on EU regulated markets or operating in the banking or insurance sectors to disclose relevant environmental and social information in their management report. The directive also requires the large listed companies to make a statement about their diversity policy in relation to the composition of their boards. The first reports have to be published in 2018 regarding financial year 2017. In addition to the NFI Directive, the Commission adopted guidelines in June 2017 to help companies disclose relevant non-financial information in a consistent and more comparable manner. The Commission is required to submit a review report on the effectiveness of the Directive by December 2018.

Question 40. The impact assessment for the NFI Directive identified the quality and quantity of non-financial information disclosed by companies as relevant issues, and pointed at the insufficient diversity of boards leading to insufficient challenging of senior management decisions. Do you think that these issues are still **relevant**?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
The quality and quantity of non-financial information disclosed by companies remain relevant issues.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The diversity of boards, and boards' willingness and ability to challenge to senior management decisions, remain relevant issues.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 40 and substantiate it with evidence or concrete examples:

- The present discussion on non-financial and diversity reporting shows that this topic is regarded as relevant. It should be acknowledged by the Commission however, that the vast majority of European listed companies have identified non-financial and diversity reporting as a strategic priority.

- Regarding diversity and efficiency of boards, listed companies throughout Europe follow corporate governance codes where these issues are addressed. Companies publish in their corporate governance reports the objectives, methods and results of their policies in these fields.

- Concerning non-financial reports, it has to be taken into account that European companies were to render these reports in accordance with the transposition of the NFI directive this year for the very first time. While it is therefore too early to assess the impacts of the directive, it has to be stressed, however, that the materiality-principle on which it is based, should be retained as only the materiality principle provides for tailor-made reports in alignment with the company's business model and potential risks arising therefrom thus corresponding to the stakeholders' needs.

Question 41. Do you think that the NFI Directive's disclosure framework is **effective** in achieving the following objectives?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Enhancing companies' performance through better assessment and greater integration of non-financial risks and opportunities into their business strategies and operations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Enhancing companies' accountability, for example with respect to the social and environmental impact of their operations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Enhancing the efficiency of capital markets by helping investors to						

integrate material non-financial information into their investment decisions.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increasing diversity on companies' boards and countering insufficient challenge to senior management decisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving the gender balance of company boards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 41 and substantiate it with evidence or concrete examples:

As stated in the answer to question 40, it is way too early to assess the impacts on the NFI directive. Reliable information, especially on the above-mentioned categories performance, accountability and efficiency (first three sub-questions), does not yet exist and cannot be expected to exist on the basis of only one reporting season. We encourage the European Commission to keep track of the future developments in the forthcoming years for the benefit of preparing a thorough and reliable impact-assessment study.

Question 42. Do you think that the NFI Directive's current disclosure framework is **effective** in providing non-financial information that is:

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Material	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Balanced	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Accurate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Timely	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Comparable between companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Comparable over time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 42 and substantiate it with evidence or concrete examples:

In line with the answer to the previous question, it is too early to give a qualified answer here. The Commission should observe the developments in non-financial reporting and conduct a reliable impact-assessment prior to any future action whatsoever in the field of non-financial reporting.

Question 43. Do you agree with the following statement:

The current EU non-financial reporting framework is sufficiently **coherent** (consistent across the different EU and national requirements)?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 43 and substantiate it with evidence or concrete examples:

The question cannot be answered without reliable data. Again, we invite the European Commission to conduct a research-study here.

Question 44. Do you agree with the following statement:

The costs of disclosure under the NFI Directive disclosure framework are proportionate to the benefits it generates.

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 44 and substantiate it with evidence or concrete examples:

In line with the answers to the previous questions, we furthermore believe it to be too early as to specify the benefits of the NFI-directive. At the moment, costs can only be assessed. The assessments, which we are aware of, are, however, enormous.

Question 45. Do you agree with the following statement:

The scope of application of the NFI Directive (i.e. limited to large public interest entities) is appropriate ("Public-interest entities" means listed companies, banks, insurance companies and companies designated by Member States as public-interest entities).

- 1 - far too narrow
- 2 - too narrow
- 3 - about right
- 4 - too broad
- 5 - way too broad
- Don't know / no opinion / not relevant

Please explain your response to question 45 and substantiate it with evidence or concrete examples:

We consider that the current scope of the directive is balanced and appropriate and should not be changed for the time being.

Question 46. It has been argued that the NFI Directive could indirectly increase the reporting burden for SMEs, as a result of larger companies requiring additional non-financial information from their suppliers.

Do you agree that SMEs are required to collect and report substantially more data to larger companies as a result of the NFI directive?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 46 and substantiate it with evidence or concrete examples:

As far as disclosures about the supply chain are required, reporting companies require corresponding information from their suppliers, which include SMEs.

Question 47. Do you agree with the following statement?

The non-binding Guidelines on Non-Financial Reporting issued by the Commission in 2017 help to improve the quality of disclosure.

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Please explain your response to question 47 and substantiate it with evidence or concrete examples:

We have no evidence that the non-binding Guidelines on Non-Financial Reporting helped to improve the quality of disclosures.

Question 48. The Commission action plan on financing sustainable growth includes an action to revise the 2017 Guidelines on Non-Financial Reporting to provide further guidance to companies on the disclosure of climate related information, building on the FSB TCFD recommendations. The action plan also states that the guidelines will be further amended regarding disclosures on other sustainability factors. Which other sustainability factors should be considered for amended guidance as a priority?

			3			Don't know /
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	1 (totally disagree)	2 (mostly disagree)	(partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	no opinion / not relevant
Environment (in addition to climate change already included in the Action Plan)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social and Employee matters	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Respect for human rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-corruption and bribery	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 49. If you are a preparer company, could you please estimate the **increased cost** of compliance with national laws on non-financial disclosure that were adopted or amended following the adoption of the NFI Directive in 2014, compared to annual non-financial disclosure costs incurred before the adoption of the NFI Directive?

Increased amount in Euros of cost of compliance with national laws - **one-off costs of reporting for the first time:**

Increased amount as a % of total operating cost of compliance with national laws - **one-off costs of reporting for the first time:**

 %

Increased amount in Euros of cost of compliance with national laws - **estimated recurring costs:**

Increased amount as a % of total operating cost of compliance with national laws - **estimated recurring costs:**

 %

Question 50. How would you assess, overall, the impact of the NFI Directive disclosure framework on the competitiveness of the reporting EU companies compared to companies in other countries and regions of the world?

- Very positive impact on competitiveness
- Somewhat positive impact on competitiveness
- No significant impact on competitiveness
- Somewhat negative impact on competitiveness
- Very negative impact on competitiveness
- Don't know / no opinion / not relevant

Please explain your response to question 50 and substantiate it with evidence or concrete examples:

As long as an international level-playing-field on the disclosure of non-financial information does not exist, European companies will have to face competitive disadvantages vis-à-vis third country companies with a lighter disclosure-regime or no disclosure-regime at all.

Country-by-country reporting by extractive and logging industries

Since 2017, companies that are active in the extractive industry or in the logging of primary forests have to be more transparent on the payments they make to governments. Through amendments made in 2013 to the Accounting and Transparency directives, such companies established in the European Union should publish each year a so-called "country-by-country report" summarising payments to governments. These reporting requirements were introduced to help governments of resource-rich countries manage their resources as well as to enable civil society to better hold governments and business into account. This should also help governments of resources-rich countries to implement the Extractive Industries Transparency Initiative (EITI) principles.

Question 51. Do you think that the public reporting requirements on payments to governments ("country-by-country reporting") by extractive and logging industries are:

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
--	--------------------------------	-------------------------------	--	----------------------------	-----------------------------	--

effective (successful in achieving its objectives)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
efficient (costs are proportionate to the benefits it has generated)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
relevant (necessary and appropriate)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
coherent (with other EU requirements)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
designed at the appropriate level (EU level) in order to add the highest value (as compared to actions at Member State level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 51 and substantiate it with evidence or concrete examples:

Question 52. As a preparer company, could you please indicate the annual recurring costs (in € and in relation to total operating costs) incurred for the preparation, audit (if any) and publication of the “country-by-country report”:

Total amount in Euros of **one-off costs of reporting** for the first time for the “country-by-country report”:

Amount as a % of total operating costs of **one-off costs of reporting for the first time** for the “country-by-country report”:

 %

Total amount in Euros of annual recurring costs for the “country-by-country report” - **estimated recurring costs**:

Amount as a % of total operating costs of annual recurring costs for the “country-by-country report” - **estimated recurring costs**:

%

Question 53. How would you assess, overall, the impact of country-by-country reporting on the competitiveness of the reporting EU companies?

- Very positive impact on competitiveness
- Somewhat positive impact on competitiveness
- No significant impact on competitiveness
- Somewhat negative impact on competitiveness
- Very negative impact on competitiveness
- Don't know / no opinion / not relevant

Please explain your response to question 53 and substantiate it with evidence or concrete examples:

Disclosures to the public of turnover, profit and taxes on a country-by-country basis would place European companies at a competitive disadvantage towards companies in third-countries, where such a disclosure-regime does not exist.

The overall effect of the public CBCR would negatively impact EU companies since their industrial and commercial strategy would be unveiled. We believe this would far outweigh any benefits expected.

Integrated reporting

In addition to a demand to broaden the range of information to be included in corporate reports, there is an ongoing debate on whether and how to integrate financial, non-financial, and other related reports in a meaningful way.

Question 54. Do you agree that integrated reporting can deliver the following **benefits**?

			3			
	1	2	(partially disagree)	4	5	Don't know / no opinion /
	(totally disagree)	(mostly disagree)		(mostly agree)	(totally agree)	/

			and partially agree)			not relevant
More efficient allocation of capital, through improved quality of information to capital providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improved decision-making and better risk management in companies as a result of integrated thinking and better understanding of the value-creation process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Costs savings for preparers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cost savings for users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other differences (please rate here and specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 54 and substantiate it with evidence or concrete examples:

The intention of this question seems to get a basis for the introduction of an Integrated Reporting requirement. We believe it should be up to each individual company to decide which reporting format is the best to address the needs of its stakeholders. Depending on the fact and circumstances, different choices of communication forms and instruments are suitable. We currently do not see Integrated Reporting as being superior to other forms of corporate reporting that would warrant introducing such a requirement for annual reports (and other corporate reporting).

Question 55. Do you agree with the following statement?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant

A move towards more integrated reporting in the EU should be encouraged	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs of a more integrated reporting would be proportionate to the benefits it generates (would be efficient)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your response to question 55 and substantiate it with evidence or concrete examples:

Again, we believe that it should be left for companies to decide within the current regulatory framework, how they can best address the information needs of their stakeholders. Since integrated reporting still is a relatively new concept, which has only been adopted by few companies so far, it is at this stage too early to specify the benefits that it brings along.

Question 56. Is the existing EU framework on public reporting by companies an obstacle to allowing companies to move freely towards more integrated reporting?

- Yes
- No
- Don't know / no opinion / not relevant

Please explain your response to question 56 and substantiate it with evidence or concrete examples:

The current regulatory framework is sufficiently flexible to allow companies to move to integrated reporting, as a number of companies applying Integrated Reporting have demonstrated. In our opinion, the limited application of Integrated Reporting is not due to obstacles arising from the existing regulatory framework.

VI. The digitalisation challenge

In the area of public reporting by companies technology is changing 1) the way companies prepare and disseminate corporate reports and 2) the way investors and the public access and analyse company information. On 6 October 2017, the '[eGovernment Declaration](#)' was signed in Tallin in the framework of the eGovernment Ministerial Conference. It marked a clear political commitment at EU level towards ensuring high quality, user-centric digital public services for citizens and seamless cross-border public services for businesses.

Digitalisation is soon to become reality for issuers with securities listed on European regulated markets ("listed companies"). These companies must file their Annual Financial Reports with the relevant Officially Appointed Mechanisms (OAMs). An Annual Financial Report mainly contains the audited financial statements, the management report and some other statements. In 2013, the Transparency Directive was amended to introduce as from 1 January 2020 a structured electronic reporting for Annual Financial Reports based on a so-called "European Single Electronic Format" (ESEF). It also established a single European Electronic Access Point (EEAP) in order to interconnect the different national OAMs. The objectives were to facilitate the filing of information by listed companies, and facilitate access to and use of company information by users on a pan-EU basis, thus reducing operational costs for both parties.

Beyond listed companies, the Commission is currently working, as announced in the 2017 Commission Work Programme, on an EU Company Law package making the best of digital solutions and providing efficient rules for cross-border operations whilst respecting national social and labour law prerogatives, which is not subject to this public consultation.

Question 57. Do you consider the existing EU legislation to be an obstacle to the development and free use by companies of digital technologies in the field of public reporting?

- Yes
- No
- Don't know / no opinion / not relevant

If you answered "Yes" to question 57, please clarify your response and substantiate it with evidence or concrete examples:

In a certain way, we believe that the suggested ESEF-format iXBRL for the filing of annual financial reports will hinder companies from the free use of digital technologies (see also Q 59).

This is because we believe that iXBRL will force companies to invest in a digital technology the benefits of which has not yet been delivered although countries like the USA have required listed companies to file their annual reports in XBRL for more than 10 years. It should also make the legislator doubt about iXBRL that ESMA comes to a different conclusion with respect to the use of digital formats for prospectuses. Here, ESMA proposes a simple XLM format in order to avoid significant investments in the IT infrastructure of both supervisory authorities and listed companies.

Question 58. Do you consider that increased digitalisation taking place in the field diminishes the relevance of the EU laws on public reporting by companies (for instance, by making paper based formats or certain provisions contained in the law irrelevant)?

- Yes
- No
- Don't know / no opinion / not relevant

If you answered "Yes" to question 58, please clarify your response and substantiate it with evidence or concrete examples:

Yes, to a certain extent.

Historically, paper-based annual reports were the centerpiece of corporate financial communication. In the era of digitalization, companies now use the opportunity to inform their stakeholders through a variety of additional instruments of communication. The benefit of these voluntary instruments is obvious: they can be updated more frequently, and information can be presented in visually more attractive formats. Since they are not subject to regulation, they can be tailor-made to address the needs of users, in particular the demand for timely and focused information on business developments. As a result, the relevance of regulated reporting continues to decline. Against this background it appears to be possible that introducing iXBRL will accelerate this trend, because iXBRL is rather not commonly used by investors and not user-friendly.

The impact of electronic structured reporting

Question 59. Do you think that, as regards public reporting by listed companies, the use of electronic structured reporting based on a defined taxonomy (ESEF) and a single access point (EEAP) will meet the following intended objectives:

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
improve transparency for investors and the public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
improve the relevance of company reporting	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
reduce preparation and filing costs for companies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
reduce costs of access for investors and the public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
reduce other reporting costs through the re-use of companies' public reporting of electronic structured data for other reporting purposes (e.g. tax authorities, national	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

statistics, other public authorities)						
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Please provide an estimated order of magnitude or qualitative comments for such cost reductions (e.g. % of preparation costs or % of costs of accessing and analysing data...):

Financial information is already easily accessible on companies' websites for the purpose of investor information and investment analysis.

As has been expressed by us in numerous comments during the consultation phase we still strongly doubt that electronic reporting based on iXBRL (which is the ESMA's suggested solution) will make the reporting for investors and public more transparent or will improve the relevance of company reporting for the following reasons that we have raised several times with the EU-Commission, ESMA and other players:

First, analysts regularly take and should take into account all soft and hard facts about a company in order to form a comprehensive view on the respective company. In particular, they have also to evaluate the explanations in the other parts of company reporting, e.g. the analyst calls, presentations, speeches, press releases or social media, which cannot be tagged in iXBRL.

Second, the standard taxonomies cannot reflect the variety of the companies' business models as well as reporting needs resulting from these different business models and the appropriate interpretation of the accounting standards. It has also to be noted, that financial statements consist of several narrative disclosures which supplement financial (performance) measures, where comparability is particularly highly questionable. As a consequence, there will remain a number of XBRL tagged items that cannot be comparable across companies. In other words: XBRL tagging cannot remove the incomparability of reports because the economic meaning of tagged item varies strongly depending on the business model and the application of the IFRS accounting standards.

Third, a tagging exercise will most likely will be very time consuming so that there is the reasonable risk, that markets will receive the information of an annual report later then in the status quo.

We also strongly doubt why iXBRL should reduce costs. In contrast, iXBRL will increase the cost of preparing and publishing information, including higher IT-implementation, maintenance, compliance, training, auditing and other ongoing internal and external services costs. iXBRL does not make reporting easier for structural reasons. Firstly, iXBRL reporting demands additional technological competences from issuers that are not yet available. Secondly, if iXBRL was chosen, the ESEF issuers would not only have to follow the permanent amendments to the International Financial Reporting Standards but also the corresponding changes of the XBRL taxonomies. The experiences in the USA have evidenced this complexity where mandatory XBRL reporting needed complementing extensive EDGAR filer manuals.

Question 60. In your opinion, on top of the financial statements, do you think that the following documents prepared by listed companies should contain electronic structured data?

Financial reporting

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Half-yearly interim financial statements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Management report	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corporate governance statement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other disclosure or statements requirements under the Transparency Directive such as information about major holdings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Non-financial reporting and other reports

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Non-financial information	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Country-by-country report on payments to governments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other documents (please rate here and specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 61. Once the ESEF is fully developed and in place for listed companies, would this EU language add value as a basis to structure the financial statements, management reports etc. published by any limited liability company in the EU?

- Yes
- No
- Don't know / no opinion / not relevant

Please explain your response to question 61 and substantiate it with evidence or concrete examples:

We consider that the Commission's question is misleading as individual financial statements of limited liability companies are published under local GAAP. Thus, applying the structure of IFRS reporting to these companies does not fit into the legal environment and would mean an interference with legislative competences of member states.

Question 62. As regards the non-financial information that listed companies, banks and insurance companies must publish, do you think that digitalisation of this information could bring about the following benefits?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
Facilitate access to information by users	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the granularity of information disclosed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce the reporting costs of preparers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to question 62 and substantiate it with evidence or concrete examples:

If we capture the term “digitalisation” correctly the EU COM tries to evaluate whether some kind of an ESEF for NFI will meet the above mentioned objectives. From our point of view introducing a reporting format like ESEF to non-financial information will neither facilitate access to information by users nor will it increase the granularity of information disclosed.

However, it will certainly increase the reporting costs of preparers.

Overall, our general concerns regarding the appropriateness of ESEF even beyond our concerns regarding the ESEF for financial information. Non-financial information is mostly of a qualitative nature which is neither designed nor appropriate for structured reporting. In addition, there are no universally applicable standards for the calculation of KPIs with regard to non-financial information which makes structured reporting even less suitable.

Question 63. Digitalisation facilitates the widespread dissemination and circulation of information. Besides, the same corporate reporting information may be available from different sources, such as a company’s web site, an OAM, a business register, a data aggregator or other sources. In a digitalised economy, do you consider that electronic reporting should be secured by the reporting company with electronic signatures, electronic seals and/or other trust services?

- Yes
- No
- Don’t know / no opinion / not relevant

Please explain your response to question 63 and substantiate it with evidence or concrete examples:

Data storage mechanisms – data repositories

Today, the self-standing national databases maintained by each Officially Appointed Mechanisms (OAMs) are not interconnected to each other, or to a central platform.

The [European Financial Transparency Gateway \(EFTG\)](#) is a pilot project funded by the European Parliament that aims to virtually connect the databases using the distributed ledger technology in order to provide a single European point of access to investors searching for investment opportunities on a pan-EU basis. The European Financial Transparency Gateway could be used as a basis for achieving a single European Electronic Access Point (EEAP).

Question 64. Considering the modern technologies at hand to interconnect databases on information filed by listed companies with the OAMs, do you agree with the following statements?

	1 (totally disagree)	2 (mostly disagree)	3 (partially disagree and partially agree)	4 (mostly agree)	5 (totally agree)	Don't know / no opinion / not relevant
A pan-EU digital access to databases based on modern technologies would improve investor protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A pan-EU digital access to databases based on modern technologies would promote cross border investments and efficient capital markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The EU should take advantage of a pan-EU digital access to make information available for free to any user	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Question 65. Public reporting data in the form of structured electronic data submitted by listed companies could potentially be re-used for different purposes by different authorities. For instance, by filing a report once with an OAMs and re-using it for filing purposes with a business register. In your opinion, should the EU foster the re-use of data and the “file only once” principle?

- Yes
- No
- Don't know / no opinion / not relevant

Please explain your response to question 65 and substantiate it with evidence or concrete examples:

Though we agree that the file once principle could be beneficial it should not mixed up with the question whether a structured reporting format is necessary. In other words: We would not call for the file once-principle if a pre-condition for it was structured reporting in iXBRL.

Coherence with other Commission initiatives in the field of digitalisation

On 1 December 2017, the Commission launched a [Fitness Check on the supervisory reporting frameworks](#). In parallel, the financial data standardisation (FDS) project, launched in 2016, aims for a 'common financial data language' across the board for supervisory purposes. The Commission will report by summer 2019 (for more details, see [Commission report on the follow up to the call for evidence - EU regulatory framework for financial services](#), December 2017 section 3.3).

Question 66. Should the EU strive to ensure that labels and concepts contained in public reporting by companies are standardised and aligned with those used for supervisory purposes?

- 1 - totally disagree
- 2 - mostly disagree
- 3 - partially disagree and partially agree
- 4 - mostly agree
- 5 - totally agree
- Don't know / no opinion / not relevant

Other comments

Question 67. Do you have any other comments or suggestions?

In addition to our detailed comments, we have two general comments:

As is well known by the EU Commission European listed companies have long called for a "fitness check". Indeed, reporting obligations have increased and have become more detailed over the past decade. This has resulted in a significant additional commitment of resources. In addition, there is a growing common understanding among preparers and investors that there is an information overload.

Against this background, we are concerned that the questionnaire does not appropriately address these kind of problems (with some minor exemptions, see e.g. Q 13), but rather starts a debate on additional reporting requirements, additional drawing on resources and less flexibility for listed companies

Similarly, we wonder why the "fitness check" does not include the obligations of listed companies from the Market Abuse Regulation (MAR). There are a number of examples where additional bureaucracy and additional compliance risks for issues have been created by MAR with no obvious benefits for investors:

- The duty to react on rumours in case they are related to inside information (Art. 17(7) MAR) which may promote abusive rumour spreading.
- The high level of detail with insider lists (Art. 18 MAR).
- The high level of detail and the increased scope of the regime of Managers' Transaction Reporting which did not improve signalling values of these kind of notifications as for example gifts and inheritances are included in the notification duty (Art. 19 MAR)
- The shortening of the time for the notification of Managers' Transaction (which is now partly corrected for SME growth markets, only) which made even more complicated for listed companies to comply in time and, in effect, may make it impossible for the issuer to comply with the rules (Art. 19 (1) MAR)
- The list of persons to be by issuers in order not only to identify all persons discharging managerial responsibilities but also persons closely associated with them (Art. 19(5) MAR) which results in a number of practical problems and appears to be overly bureaucratic.
- And last but not least: the extremely high level of sanctions that may be imposed which may serve as disincentive to use organised capital markets as a source of finance.

Acronyms and Abbreviations

AD

Accounting Directive

BAD

Bank Accounts Directive

CEP

Centre for European Studies

CBCR

Country by Country Reporting

CLD

Company Law Directive

CMD

Capital Maintenance Directive

CMU

Capital Markets Union

CRD

Capital Requirements Directive

CRR

Capital Requirements Regulation

DG FISMA
Directorate General Financial Stability, Financial Services and Capital Markets Union

DLT& API
Distributed Ledger Technology & Application Programme Interface

EC
European Commission

EFRAG
European Financial Reporting Advisory Group

EFTG
European Financial Transparency Gateway

EITI
Extractive Industries Transparency Initiative

ESG
Environmental, Social & Governance factors

ESMA
European Securities and Markets Authority

ESRB
European Systemic Risk Board

FSB
Financial Stability Board

GAAPs
General Accepted Accounting Principles

HLEG
High-Level Expert Group

IAD
Insurance Accounts Directive

IAS
International Accounting Standards

IASB
International Accounting Standards Board

IFRS
International Financial Reporting Standards

IFRS 4
International Financial Reporting Standards on Insurance contracts

IFRS 9
International Financial Reporting Standards on Financial Instruments

IFRS 17	will replace IFRS 4 as of 1 January 2021
IIRC	International Integrated Reporting Council
KPIs	Key Performance Indicators
NFR	Non-Financial Reporting Directive (also called NFI for Non-Financial Information)
NGOs	Non-governmental Organisation
OAMs	Officially Appointed Mechanisms
OECD	Organization for Economic Co-operation and Development
PIE	Public Interest Entities
P&L	Profit and Loss account
SMEs	Small and Medium Enterprises
SRB	Single Resolution Board
SSM	Single Supervisory Mechanism
TCFD	Task Force on Climate-related Financial Disclosures
TD	Transparency Directive

3. Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) here:

[eb26b49a-117e-4dfd-aa2e-f78ffd7401cd/Fitness_Check_Public_Reporting_Letter_Olivier_Guersent.pdf](#)

Useful links

[Consultation details \(http://ec.europa.eu/info/consultations/finance-2018-companies-public-reporting_en\)](http://ec.europa.eu/info/consultations/finance-2018-companies-public-reporting_en)

[Specific privacy statement \(http://ec.europa.eu/info/files/2018-companies-public-reporting-consultation-document_en\)](http://ec.europa.eu/info/files/2018-companies-public-reporting-consultation-document_en)

[More on the Transparency register \(http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en\)](http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en)

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