

# Applying IFRS 9 with IFRS 4

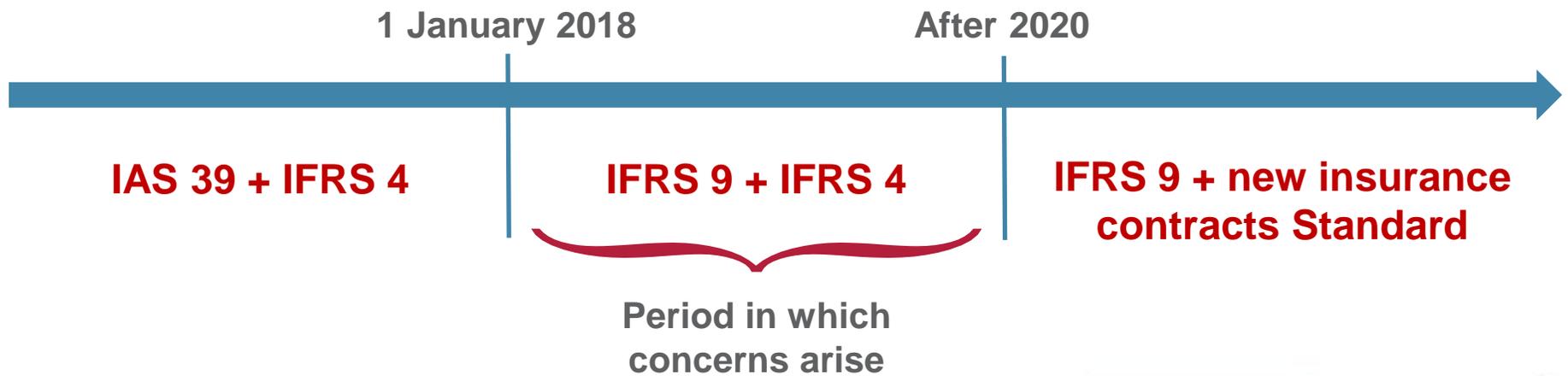
Issued September 2016

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# Background

- IFRS 9 *Financial Instruments* is effective from **1 January 2018**
- Currently, IFRS 4 applies to all issuers of insurance (eg banks). The replacement insurance contracts Standard is likely to be effective **after 2020**
- Some preparers raised concerns about the gap in effective dates
  - two consecutive major accounting changes
  - additional volatility in profit or loss could arise in this period



- The Board issued final amendments to IFRS 4 in September 2016, introducing two optional approaches:

## The **overlay approach**:

- Available to all issuers of insurance contracts
- Recognises in OCI, rather than P&L, the volatility that could arise when IFRS 9 is applied before the new insurance contracts Standard
- Available until that new Standard is issued

## The **temporary exemption**:

- Available to companies whose activities are predominantly connected with insurance
- IAS 39 is applied rather than IFRS 9
- Available until 2021 (or until the new insurance contracts Standard is applied if that is earlier)

# Feedback on Exposure Draft

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- **96 comment letters** received (across all major geographical regions), discussions conducted with **70 users** of financial statements
- Main challenge: balancing needs of preparers with those of users
- Mixed views on:
  - Is there a need to address the two different effective dates?
  - Who should be eligible for temporary exemption?
  - Fixed expiry date for temporary exemption?
  - Disclosures for temporary exemption
  - Amount of optionality

# The overlay approach

- IFRS 9 applied in full
- Entities reclassify between P&L and OCI
  - difference between IFRS 9 and IAS 39 amounts
  - for financial assets
    - measured at FVPL under IFRS 9 that would not be measured at FVPL under IAS 39; and
    - not connected with activities other than insurance.
- Objective is to remove any additional volatility from P&L in a **transparent** and **consistent** manner while **maximising comparability**

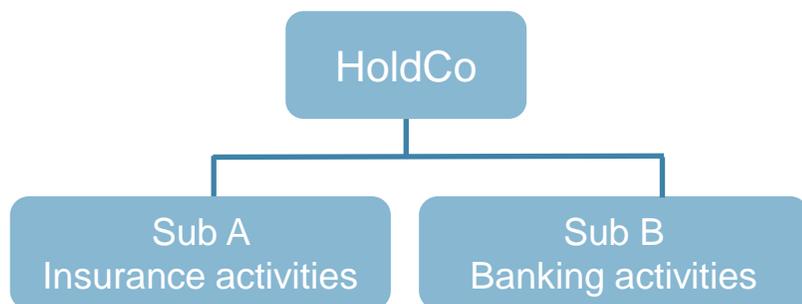
Statement of Comprehensive Income	
	20XX
Insurance contracts revenue	X
Incurred claims and expenses	(X)
<b>Operating result</b>	<b>X</b>
Investment income 'IFRS 9'	X
Interest on insurance liability	(X)
Overlay approach—adjustment	(X)
<b>Investment result</b>	<b>X</b>
<b>Profit or loss</b>	<b>X</b>
Overlay approach—adjustment	X
Effect of discount rate changes on insurance liability	(X)
<b>Other comprehensive income</b>	<b>X</b>
<b>Total comprehensive income</b>	<b>X</b>

# The temporary exemption: *Deferral at reporting entity level*

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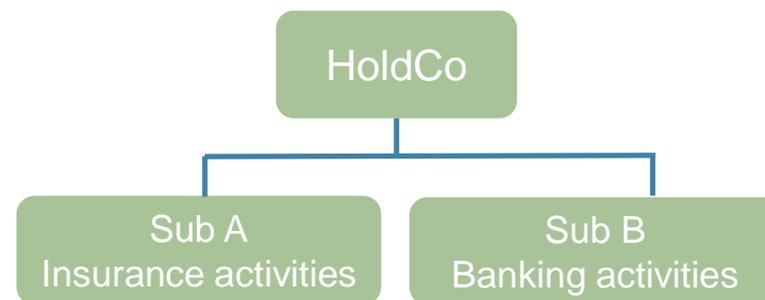
■ IFRS 9 ■ IAS 39

- If the activities of the conglomerate are predominantly related to insurance:



- The conglomerate could choose to apply IAS 39 to all financial assets in consolidated financial statements
- However, if Subsidiary B publishes standalone IFRS financial statements it must apply IFRS 9

- If the activities of the conglomerate are NOT predominantly related to insurance:



- The conglomerate must apply IFRS 9 to all financial assets in consolidated financial statements
- However, if Subsidiary A publishes standalone IFRS financial statements it could choose to apply IAS 39

# The temporary exemption: *Deferral at **reporting** entity level*

At reporting entity level	Below reporting entity level
<ul style="list-style-type: none"><li>• An entity applies <u>either</u> IAS 39 <u>or</u> IFRS 9<ul style="list-style-type: none"><li>- IAS 39 is continuation of existing requirements</li><li>- IFRS 9 is better information</li></ul></li><li>• User and regulator support</li></ul>	<ul style="list-style-type: none"><li>• An entity applies <u>both</u> IAS 39 and IFRS 9</li><li>• Two changes in a short period of time (IAS 39 → IAS 39 &amp; IFRS 9 → IFRS 9)</li><li>• More complex for preparers and users to understand</li></ul>

→ The Board decided eligibility for temporary exemption at the reporting entity level

- Focused on improving criteria to facilitate peer comparison (broadened eligibility)
- Can supplement with extra disclosures

# The temporary exemption: *Who can apply it?*

- The company's activities must be *predominantly connected with insurance*. To qualify, the company must have:
  - not previously applied IFRS 9 (other than the 'own credit requirements' in isolation);
  - significant IFRS 4 liabilities compared to total liabilities; and
  - predominance percentage ( $P^*$ )  $> 90\%$  or  
 $80\% < P^* \leq 90\%$  and no significant activity unconnected with insurance

$$*P = \frac{\begin{array}{l} \text{Liabilities from contracts within the scope of IFRS 4} \\ + \text{Investment contracts at FVPL} \\ + \text{Other connected liabilities (eg tax)} \end{array}}{\text{Total liabilities}}$$

- More insurers are expected to qualify than under the ED

- Further exemptions provided by the Board:
  - An investor applying IFRS 9 may retain the IAS 39 accounting used by its associate or joint venture applying the deferral (or vice versa); and
  - ‘First time adopters’ of IFRS Standards may apply deferral or overlay approach
- These additional exemptions allow **more entities to qualify for relief** than initially proposed in the ED

# Disclosures: temporary exemption

- Users requested **additional disclosures** to compare companies applying IFRS 9 with those applying the temporary exemption
- The Board balanced the **costs for preparers** of additional disclosures and **users' need for comparability**
- The Board decided to require additional disclosures to enable some comparisons, but rejected unduly onerous options (eg application of the expected credit loss model is not required)

# Disclosures: temporary exemption

Population 1*	Population 2**
Financial assets with contractual cash flows that are solely principal and interest (SPPI) excluding those: (a) held for trading; or (b) managed on a fair value basis.	All other financial assets; ie those: (a) held for trading; (b) managed on a fair value basis; or (c) not SPPI.
Fair value information	Fair value information
Information about credit risk exposure, including: (a) carrying amounts by credit risk rating grades; and (b) for assets other than low credit risk, fair value information and carrying amounts.	

*\*Similar to population of assets to which expected credit loss requirements would apply*

*\*\* Similar to population of assets mandatorily measured at FVPL applying IFRS 9*

- Temporary exemption from IFRS 9 effective for annual periods beginning on or after 1 January 2018
- Overlay approach effective when an insurer first applies IFRS 9

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