

ASC

ACCOUNTING STANDARDS COUNCIL
SINGAPORE

17 September 2018

Mr Michel Prada
Chair of the Trustees
IFRS Foundation
Columbus Building
7 Westferry Circus
Canary Wharf
London E14 4HD
United Kingdom

(By online submission)

Dear Michel:

RESPONSE TO EXPOSURE DRAFT ON AMENDING THE TERMS OF APPOINTMENT FOR THE IFRS FOUNDATION TRUSTEE CHAIR AND VICE-CHAIRS

The Singapore Accounting Standards Council appreciates the opportunity to comment on the Exposure Draft on Amending the Terms of Appointment for the IFRS Foundation Trustee Chair and Vice-Chairs (the ED) issued by the Trustees of the IFRS Foundation (the Trustees) in June 2018.

We support the Trustees' proposed amendments to the IFRS Foundation's *Constitution* (the Constitution). The proposed amendments would provide the IFRS Foundation with the benefits of continuity and flexibility in the appointment of the Trustee Chair and/or Vice-Chairs, without compromising on the Trustees' independence and geographical diversity.

We note that the drafting of the proposed amendments relating to Trustee reappointments could create ambiguity about the intended scope of the amendments. It would appear that the proposed amendments are intended to apply to reappointments involving only an ordinary member of the Trustee body (i.e. other than a Chair or Vice-Chair), throughout both the initial and subsequent terms, given the context in which the term 'Trustees' is used in Section 8 of the Constitution. However, the same term has been used interchangeably in the Constitution – including Section 10 – to also mean any member of the Trustee body (including the Chair and Vice-Chairs), or the Trustee body itself.

This ambiguity may cause some confusion as to how Section 8 should interact with Section 10, for example, whether a previous Chair or Vice-Chair could be reappointed to serve as a member of the Trustee body under Section 8, or whether an ordinary member of the Trustee body could be reappointed under Section 8 to subsequently serve as Chair or Vice-Chair

under Section 10. Might we suggest that the Trustees consider addressing this ambiguity, by clarifying that the proposed amendments would apply to reappointments involving only an ordinary member of the Trustee body, throughout both the initial and subsequent terms.

We trust that our comments will contribute to the Trustees' deliberation on the ED. Should you require any further clarification, please contact Nicole Cai at Nicole_Cai@asc.gov.sg.

Yours sincerely

Suat Cheng Goh
Technical Director
Accounting Standards Council, Singapore