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Mr Chris Joy

Executive Director, Standard and Regulation

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Dear Mr Joy,

IASB Exposure Draft ED/2019/7 General Presentation and Disclosures

Thank you for your letter dated 23 December 2019 inviting our comments on the exposure draft ED/2019/7 ("the Exposure Draft") issued by the International Accounting Standards Board ("IASB") in relation to the general presentation and disclosure requirements.

The Exposure Draft responds to the strong demand from investors for the IASB to improve performance reporting. In the Exposure Draft, the IASB proposes to require companies to present new defined subtotals in the statement of profit or loss; disaggregate information in a better way; and disclose information about some performance measures defined by management. The proposals would result in a new IFRS Standard that sets out general presentation and disclosure requirements relevant for all companies, replacing IAS 1 Presentation of Financial Statements.

We broadly support IASB's proposals in the Exposure Drafts. The proposed requirements improve the way information is communicated in the financial statements and make it easier for investors to compare companies and find the information they need to make their own analyses. Insofar as tax administration is concerned, we have no comment on the proposed requirements. We are grateful for the opportunity to provide our comments on the Exposure Draft.

Yours sincerely,

(Ms WONG Pui-ki)

for Commissioner of Inland Revenue