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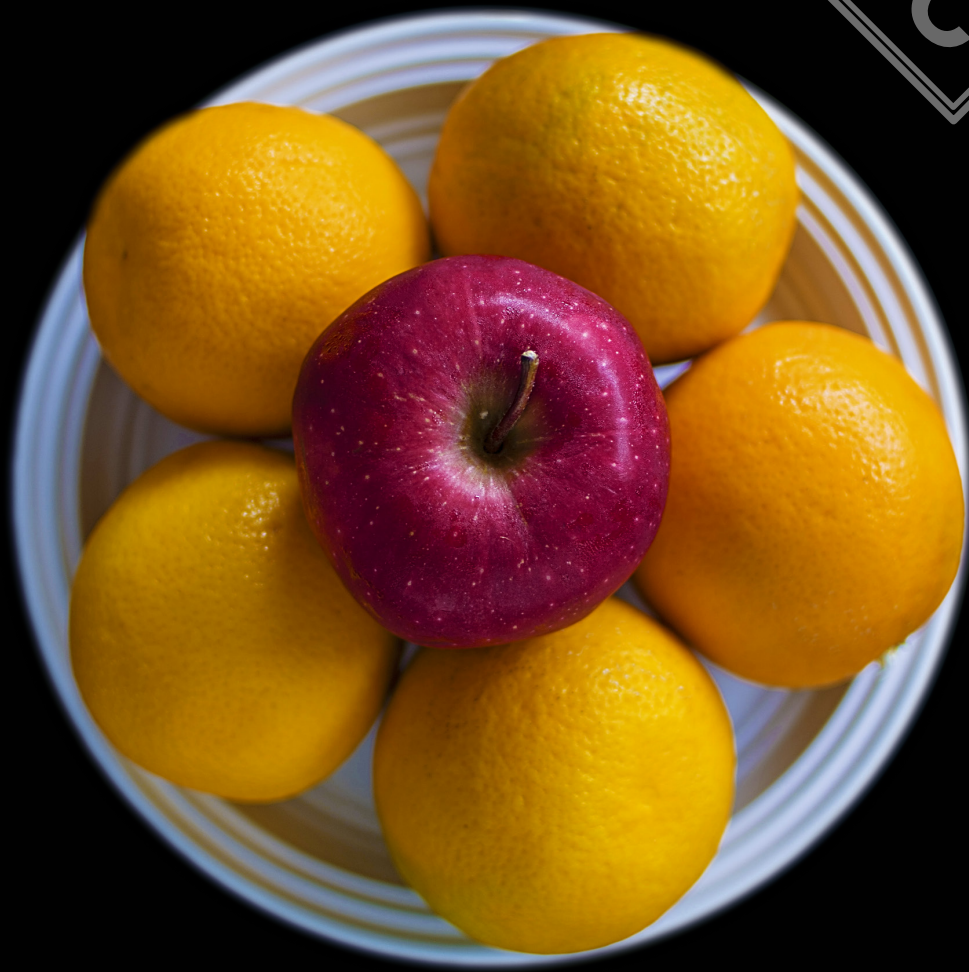
MEETING DOCUMENT

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| From: | Commission services |
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Deloitte.

PUBLIC



**A Comparison of IFRS
Standards and U.S. GAAP:
Bridging the Differences**

-2019



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Earnings per Share

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Initial Public Offerings

Leases

Noncontrolling Interests

Non-GAAP Financial Measures

Revenue Recognition

SEC Comment Letter Considerations, Including Industry Insights

Segment Reporting

Share-Based Payment Awards

Statement of Cash Flows

Coming soon:

Convertible Debt

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Preface

February 4, 2019

To our clients, colleagues, and other friends:

We are pleased to present *A Comparison of IFRS Standards and U.S. GAAP: Bridging the Differences*, which explores some of the key differences between IFRS® Standards and U.S. GAAP as of January 1, 2019. Over the years, these differences have decreased for some topics but have increased for others. In 2002, the International Accounting Standards Board (IASB®) and the FASB issued a Memorandum of Understanding, which set out priorities and milestones to be achieved on major joint projects. The two boards worked together to improve their standards and seek convergence.

The results were mixed with respect to convergence. We have seen significant convergence in topics such as business combinations and revenue recognition. However, key differences have increased for topics such as financial instruments and the subsequent measurement of leases. For now, the remaining projects under the Memorandum of Understanding have been deferred, and there are no current projects on which the boards are working together toward converged solutions.

An understanding of the differences between U.S. GAAP and IFRS Standards may be relevant for:

- U.S. entities that consolidate subsidiaries or other foreign operations that report under IFRS Standards (or foreign subsidiaries that report under IFRS Standards and provide financial statement information to a parent entity that reports under U.S. GAAP).
- U.S. entities that provide financial statement information to a parent entity that reports under IFRS Standards (or foreign entities that report under IFRS Standards and consolidate subsidiaries or other operations that report under U.S. GAAP).
- U.S. entities that negotiate transaction terms with entities that report under IFRS Standards (and vice versa).
- Investors and other users of financial statements that seek to compare financial statements prepared under U.S. GAAP and IFRS Standards.
- Standard setters and others that consider opportunities to converge accounting requirements.
- Parties that participate in discussions on or seek to influence the development of new accounting requirements under U.S. GAAP or IFRS Standards.

This publication does not attempt to capture all the differences that exist between the two sets of standards or that may be material to a particular entity's financial statements. Our focus is on differences that are commonly found in practice. The significance of these differences — and others not included in this publication — to a given entity will vary depending on such factors as the nature of its operations, the industry in which it operates, and the accounting policy choices it has made. Reference to the underlying accounting standards and any relevant national regulations is essential to understanding the specific differences.

If you have questions about the information in this publication or would like assistance in understanding the key differences, we encourage you to consult with our technical specialists and other professional advisers.

We hope that you find *A Comparison of IFRS Standards and U.S. GAAP: Bridging the Differences* a useful resource and welcome your suggestions for improvements.

Sincerely,

Deloitte & Touche LLP

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Chapter 1 — Assets

1.1 Investments in Loans and Receivables

Under both IFRS Standards and U.S. GAAP, loans and receivables are classified into categories that drive the measurement of these instruments. However, there are significant differences between IFRS Standards and U.S. GAAP in how these instruments' classifications are determined. Further, measurement differences exist because of these classification differences. The table below summarizes the key differences regarding Investments in loans and receivables under the two frameworks.

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 310-10, ¹ ASC 310-30) |
|---|--|---|
| Classification and measurement categories | <p>Except for financial assets for which the fair value option (FVO) has been elected (see Section 5.5), financial assets are classified on the basis of both (1) the entity's business model for managing them and (2) their contractual cash flow characteristics. Three classification categories are used:</p> <ul style="list-style-type: none">• <i>Amortized cost</i> — The assets are held within a business model with the objective to collect contractual cash flows that are solely payments of principal and interest (SPPI).• <i>Fair value, with changes in fair value through other comprehensive income (FVTOCI)</i> — The assets have contractual cash flows that are SPPI and are held within a business model with the objective of both collecting contractual cash flows and selling financial assets.• <i>Fair value through profit or loss (FVTPL)</i> — The assets have contractual cash flows that are not SPPI or are not held within a business model with the objective to (1) collect contractual cash flows or (2) both collect contractual cash flows and sell financial assets. | <p>Generally, loan receivables are classified on the basis of management's intent as either held for sale (HFS) or held for investment (HFI). Unless the FVO is elected (see Section 5.5), loan receivables are measured at either (1) the lower of cost or fair value (for HFS loans) or (2) amortized cost (for HFI loans).</p> |

¹ For the full titles of standards, topics, and regulations used in this publication, see [Appendix B](#). For a list of abbreviations used in this publication, see [Appendix C](#).

(Table continued)

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 310-10, ASC 310-30) |
|--|--|---|
| Recognition and measurement of impairment losses | <p><i>Expected-loss approach</i> — An impairment loss on a financial asset accounted for at amortized cost or at FVTOCI is recognized immediately on the basis of expected credit losses.</p> <p>Depending on the financial asset's credit risk at inception and changes in credit risk from inception, as well as the applicability of certain practical expedients, the measurement of the impairment loss will differ. The impairment loss would be measured as either (1) the 12-month credit loss or (2) the lifetime expected credit loss.</p> <p>Further, for financial assets that are credit impaired at the time of recognition, the impairment loss will be based on the cumulative changes in the lifetime expected credit losses since initial recognition.</p> | <p><i>Incurred-loss approach</i>² — A loan is impaired if it is probable that a creditor will be unable to collect all amounts due. A loss on an impaired loan is recognized if the amount of the loss can be reasonably estimated.</p> <p>Specific measurement methods are required for certain loans that are individually considered impaired.</p> |
| Effective interest method | <p>The effective interest rate is computed on the basis of the estimated cash flows that are expected to be received over the expected life of a loan by considering all of the loan's contractual terms (e.g., prepayment, call, and similar options) but not expected credit losses.</p> <p>If estimated receipts are revised, the carrying amount is adjusted to the present value of the future estimated cash flows, discounted at the financial asset's original effective interest rate (cumulative catch-up approach). The resulting adjustment is recognized within profit or loss.</p> | <p>The effective interest rate is computed on the basis of the contractual cash flows over the contractual term of the loan, except for (1) certain loans that are part of a group of prepayable loans and (2) purchased loans for which there is evidence of credit deterioration.</p> <p>If estimated payments for certain groups of prepayable loans are revised, an entity may adjust the net investment in the group of loans, on the basis of a recalculation of the effective yield to reflect actual payments to date and anticipated future payments, to the amount that would have existed had the new effective yield been applied since the loans' origination/acquisition, with a corresponding charge or credit to interest income.</p> |
| Interest recognition on impaired loans | <p>Interest revenue is calculated on the basis of the gross carrying amount (i.e., the amortized cost before adjusting for any loss allowance) unless the loan (1) is purchased or originated credit impaired or (2) subsequently became credit impaired. In those cases, interest revenue is calculated on the basis of amortized cost (i.e., net of the loss allowance).</p> | <p>There is no specific guidance on the recognition, measurement, or presentation of interest income on an impaired loan, except for certain loans acquired with deteriorated credit quality. For certain loans that are impaired and placed in nonaccrual status, no interest income is recognized.</p> |

² In June 2016, the FASB issued [ASU 2016-13](#), which changes the recognition and measurement of impairment losses from an incurred-loss approach to a current expected credit loss (CECL) approach. Upon the adoption of ASU 2016-13, both IFRS Standards and U.S. GAAP will require the application of an expected-loss approach. However, new differences will arise because these approaches are not converged.

1.2 Investments in Debt and Equity Securities

Under both IFRS Standards and U.S. GAAP, investments in debt securities are classified into categories that affect the measurement of these instruments. But significant differences exist between the two frameworks in how these instruments' classifications are determined. In addition, measurement differences exist because of these classification differences. The table below summarizes the key differences regarding investments in debt and equity securities under IFRS Standards and U.S. GAAP.

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 320-10, ASC 321-10) |
|--|--|---|
| Initial recognition — trade-date versus settlement-date accounting | An entity may elect as an accounting policy to apply trade-date or settlement-date accounting to each financial asset group defined in IFRS 9. However, trade-date or settlement-date accounting must be applied consistently to all financial assets in the same classification category. | Except for certain industries, U.S. GAAP do not provide guidance on whether a security should be initially recognized on a trade-date or settlement-date basis. An entity's accounting often depends on the industry in which it operates. |
| Classification and measurement — debt securities | <p>Except for financial assets for which the FVO has been elected (see Section 5.5), classify financial assets on the basis of both (1) the entity's business model for managing them and (2) their contractual cash flow characteristics. Three classification categories are used:</p> <ul style="list-style-type: none"> • <i>Amortized cost</i> — The assets are held within a business model with the objective to collect contractual cash flows that are SPPI. • <i>FVTOCI</i> — The assets have contractual cash flows that are SPPI and are held within a business model with the objective of both collecting contractual cash flows and selling financial assets. • <i>FVTPL</i> — The assets have contractual cash flows that are not SPPI or are not held within a business model with the objective to (1) collect contractual cash flows or (2) both collect contractual cash flows and sell financial assets. | <p>The determination of which classification category is applicable depends, in part, on management's intent and ability to hold the securities and is made on an instrument-by-instrument basis. Classification categories include:</p> <ul style="list-style-type: none"> • <i>Held to maturity (HTM)</i> — Securities are accounted for at amortized cost. • <i>Available for sale (AFS)</i> — Securities are accounted for at FVTOCI. • <i>Trading</i> — Securities are accounted for at fair value through net income (FVTNI). <p>Further, ASC 825-10 permits the election of a FVO under which the instrument would be accounted for at FVTNI (see Section 5.5).</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 320-10, ASC 321-10) |
|--|--|---|
| Classification and measurement — equity securities | <p>Require equity securities to be measured at FVTPL except for qualifying investments that:</p> <ul style="list-style-type: none"> • Are not held for trading. • The holder elects at initial recognition to account for at FVTOCI. | <p>Generally require equity securities to be measured at FVTNI unless an entity elects to:</p> <ul style="list-style-type: none"> • Measure qualifying equity securities that do not have a readily determinable fair value at cost less impairment, plus or minus qualifying observable price changes. • Apply a practical expedient in qualifying circumstances to measure the fair value of investments in certain entities that calculate net asset value (NAV) per share as of the measurement date. |
| Impairment — debt securities | <p>Recognize an impairment loss on a debt security accounted for at amortized cost or at FVTOCI immediately on the basis of expected credit losses.</p> <p>Previously recognized expected credit losses are reversed through profit or loss (as an impairment gain) if expected credit losses decrease.</p> <p>Depending on the financial asset's credit risk at inception and changes in credit risk from inception, as well as the applicability of certain practical expedients, the measurement of the impairment loss will differ. The impairment loss would be measured as either (1) the 12-month credit loss or (2) the lifetime expected credit loss.</p> <p>Further, for financial assets that are credit impaired at the time of recognition, the impairment loss will be based on the cumulative changes in the lifetime expected credit losses since initial recognition.</p> | <p>Recognize impairment only when the decline in fair value is other than temporary.³</p> <p>Subsequent recoveries in fair value of an impaired debt security are not recognized in earnings.</p> |
| Impairment — equity securities | <p>No assessment of impairment.</p> | <p>Qualitatively consider impairment indicators if an entity has elected to measure qualifying equity securities that do not have a readily determinable fair value at cost less impairment, plus or minus qualifying observable price changes.</p> |

³ In June 2016, the FASB issued ASU 2016-13, which changes the recognition and measurement of impairment losses on HTM securities to a CECL approach and makes targeted improvements to the impairment requirements for AFS securities.

1.3 Investments — Equity Method and Joint Ventures

Both IFRS Standards and U.S. GAAP require the application of the equity method of accounting to certain investments (note that for IFRS Standards purposes, investees are referred to as associates). However, as shown in the table below, the standards differ in several respects in the determination of when and how the equity method should be applied.

| Topic | IFRS Standards (IFRS 11, IFRS 3, IAS 28) | U.S. GAAP (ASC 323-10, ASC 808) |
|--|--|--|
| Scope — general | <p>An investor must apply the equity method of accounting when it has significant influence over an investee unless the investment is in a venture capital organization or a mutual fund, unit trust, or similar entity (i.e., investment entities). For these investment entities, the investor may account for its investments that would otherwise qualify for the equity method by using FVTPL.</p> <p>Because IFRS Standards do not include a FVO for equity method investments, the application of the FVO rather than the equity method is more limited than it is under U.S. GAAP.</p> | <p>An investor must apply the equity method of accounting when it has significant influence over an investee unless (1) it has elected the FVO or (2) it carries its investment at fair value under specialized industry accounting guidance applicable to investment companies. In these cases, the investor would record its interest at fair value.</p> |
| Scope — investments in instruments other than common equity | <p>The evaluation of significant influence is framed in reference to “voting rights,” which can arise from instruments other than ordinary common shares. However, the equity method of accounting may be applied to ordinary shares or instruments that are substantively the same as ordinary shares.</p> | <p>An investor would apply the equity method of accounting for an investment in a corporation when it has significant influence over an investee and it holds an investment in common stock or in-substance common stock. In-substance common stock includes instruments that are substantially similar to common stock based on subordination, risks and rewards of ownership, and an obligation to transfer value.</p> |
| Applying the equity method of accounting — significant influence | <p>Although IAS 28 provides considerations similar to those in U.S. GAAP for the evaluation of whether an investor holds significant influence over an investee, IFRS Standards do not provide explicit significant-influence investment thresholds for partnerships or LLCs.</p> | <p>The evaluation of significant influence is generally the same as it is under IFRS Standards. However, U.S. GAAP have special guidance for partnerships. An investment greater than 3 percent to 5 percent in a partnership or LLC that maintains specific ownership accounts is generally accounted for under the equity method of accounting even if the investor does not have significant influence.</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 11, IFRS 3, IAS 28) | U.S. GAAP (ASC 323-10, ASC 808) |
|--|--|---|
| Applying the equity method of accounting — potential voting rights | An investor should consider “potential voting rights that are currently exercisable or convertible” in evaluating significant influence. Instruments with potential voting rights contingent on future events or the passage of time would not be considered until the contingent event occurs or the specified time frame passes. | An investor would consider only “present voting privileges.” Therefore, potential voting rights are generally disregarded. |
| Initial measurement — contingent consideration | Although IFRS Standards do not provide explicit guidance, contingent consideration is generally recognized at fair value by analogy to IFRS 3. Therefore, contingent consideration is generally recognized at its fair value on the acquisition date in accordance with IFRS 3. Subsequently, the liability is measured at fair value, with any changes in value recognized in the income statement. | Contingent consideration may be recognized in two scenarios: <ul style="list-style-type: none"> • When the contingent consideration meets the recognition criteria of U.S. GAAP (other than ASC 805), such as if the contingent consideration meets the definition of a derivative. • When the noncontingent consideration offered is less than the interest in the investee’s underlying net assets. |

(Table continued)

| Topic | IFRS Standards (IFRS 11, IFRS 3, IAS 28) | U.S. GAAP (ASC 323-10, ASC 808) |
|--|---|---|
| Initial measurement — nonmonetary contributions to investee for equity interests | <p>IFRS Standards contain conflicting guidance, which the IASB attempted to resolve through a narrow-scope amendment. IAS 28 indicates that nonmonetary contributions should be recognized with partial gain recognition. This, however, conflicts with IFRS 10, which indicates that upon loss of control of a subsidiary, a parent should recognize full gain or loss. Therefore, when an entity contributes shares of a subsidiary in exchange for an equity method investment, the entity in effect has an accounting policy choice between applying the approach in IFRS 10 (full gain recognition) or IAS 28 (partial gain recognition) since both IAS 28 and IFRS 10 have equal standing under IFRS Standards.</p> <p>The IASB issued <i>Sale or Contribution of Assets Between an Investor and Its Associate or Joint Venture (Amendments to IFRS 10 and IAS 28)</i> in September 2014 to resolve this conflict. The amendments would require an investor to determine whether the assets contributed represented a business. If they did, IFRS 10 would apply, and full gain recognition would be appropriate. If they did not, IAS 28 would apply, and partial gain recognition would be appropriate. However, the effective date of the amendments has been deferred indefinitely because several practical implementation issues were identified. The amendments will be considered as part of the IASB's larger research project on the equity method of accounting. Therefore, until further guidance is issued, entities may continue to make an accounting policy choice between partial gain recognition and full gain recognition when applying IFRS Standards, whereas U.S. GAAP provides more specific requirements on the basis of whether the assets contributed constitute a business.</p> | <p>The recognition of nonmonetary contributions to an equity method investee depends on whether the assets contributed are a business. If they are, ASC 810 would indicate that full gain or loss recognition is required (except if the transaction is the sale of in-substance real estate or a conveyance of oil and gas mineral rights). If they are not, the gain recognized would generally be limited to the portion of the assets effectively sold to the other investors in the equity method investment (partial gain recognition).</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 11, IFRS 3, IAS 28) | U.S. GAAP (ASC 323-10, ASC 808) |
|---|--|---|
| Subsequent measurement — losses in excess of interests | Typically require an investor to discontinue use of the equity method of accounting when the value of an investment reaches zero unless the investor has incurred legal or constructive obligations or made payments on behalf of the associate. | An investor generally discontinues use of the equity method of accounting when the value of an investment reaches zero unless the investor has guaranteed obligations of the investee or is otherwise committed to provide further financial support to the investee. However, unlike IFRS Standards, U.S. GAAP require an investor to continue to recognize additional losses after the investment reaches zero if the imminent return to profitable operations appears to be assured. |
| Subsequent measurement — impairment | An entity must test an investment for impairment by comparing its recoverable amount (the higher of its value in use or its fair value less costs to sell) with its carrying amount whenever there is indication of any impairment. Impairment losses should be reversed in a subsequent period to the extent that the recoverable amount of the associate or joint venture increases. | An entity must record impairment or losses in value of an investment that represent an other-than-temporary decline. A reduction in the current fair value of an investment below its carrying amount may indicate a loss in value of the investment. Impairment losses cannot be reversed in subsequent periods. |
| Subsequent measurement — differences in reporting periods | The investor's and investee's reporting dates must be the same unless it is impracticable for them to be the same. When it is impracticable, the dates must be no more than three months apart. Unlike U.S. GAAP, IFRS Standards require the investor to record its share of the associate's significant transactions or events that have occurred during the lag period. | U.S. GAAP allow for a difference in reporting dates of not more than three months. An entity must disclose the effect of any transactions or events during the intervening period that materially affect the investor's financial statements. |
| Subsequent measurement — differences in accounting policies | Require that adjustments be made to a joint venture's financial statements to conform the joint venture's accounting policies to those of the venture. | Do not require adjustments to financial statements when a venturer and its joint venture have different accounting policies; however, a venturer has the option of conforming a joint venture's accounting policies to those of the venturer. |
| Subsequent measurement — loss of significant influence | An investor would recognize any retained interest at fair value, with any difference between the fair value of the retained interest and the carrying value of the equity method investment recognized in the income statement. | When an investor loses significant influence over an investee, it recognizes any retained investment on the basis of historical cost and thus recognizes no gain or loss solely because of the loss of significant influence (and thus the discontinuance of the equity method of accounting). Note, however, that other U.S. GAAP subsequently applicable to the investment may require measurement at fair value, with changes recognized in income. |

(Table continued)

| Topic | IFRS Standards (IFRS 11, IFRS 3, IAS 28) | U.S. GAAP (ASC 323-10, ASC 808) |
|-----------------------------|---|---|
| Joint arrangements — models | <p>IFRS 11 defines a joint arrangement as an “arrangement of which two or more parties have joint control” and clarifies that joint control exists only when “decisions about the relevant activities require the unanimous consent of the parties that collectively control the arrangement.”</p> <p>IFRS 11 requires a party to a joint arrangement to determine the type of joint arrangement in which it is involved by assessing its rights and obligations arising from the arrangement. IFRS 11 establishes two types of joint arrangements: (1) joint operations and (2) joint ventures, both distinguished by the rights and obligations of the parties involved.</p> <p>In a joint operation, the parties have rights to the underlying assets and obligations for the liabilities of the arrangement and should recognize their share of the assets, liabilities, revenues, and expenses arising from their interest.</p> <p>In a joint venture, the parties have rights to the net assets of the arrangement and should account for their interests by using the equity method of accounting. Further, a joint venture requires the use of a separate vehicle (e.g., a separate legal entity); otherwise, the arrangement is a joint operation. Note that the existence of a separate vehicle is not sufficient evidence on which to base a conclusion that the arrangement is a joint venture.</p> | <p>Before determining the appropriate accounting model to use, an entity must first assess whether the joint venture is a VIE. If so, the entity must apply the consolidation model in ASC 810. If the VIE is not consolidated under ASC 810, the entity must determine which of the following two accounting models is appropriate to use:</p> <p><i>Joint operations not involving a legal entity</i> — ASC 808, and not ASC 323, addresses jointly controlled operations not primarily conducted through a legal entity. Under ASC 808, a joint operator must be (1) an active participant in the joint operations conducted primarily outside of a legal entity and (2) exposed to significant risks and rewards dependent on commercial success of the joint activity.</p> <p><i>Jointly controlled entities</i> — These are entities, such as joint ventures, for which all significant decisions regarding the financing, development, sale, or operations require the approval of two or more of the owners. Investors with joint control would generally be able to apply the equity method of accounting.</p> |

1.4 Inventories

The definitions of “inventory” under IFRS Standards and U.S. GAAP are essentially the same. The primary differences between the two frameworks regarding the accounting for inventories relate to costing methods and impairment reversals, as summarized in the table below.

| Topic | IFRS Standards (IAS 2) | U.S. GAAP (ASC 330) |
|--|---|---|
| Costing methods (cost formulas) | First-in, first-out (FIFO) and weighted-average cost are acceptable accounting methods for determining cost of inventory. Last-in, first-out (LIFO) is not permitted. The specific identification method is required for inventory items that are not ordinarily interchangeable and for goods or services produced and segregated for specific projects. | FIFO, LIFO, weighted-average cost, and specific identification are acceptable accounting methods for determining cost of inventory. |
| Consistency of costing methods (cost formulas) | The same costing method must be applied to all inventories that have a similar nature and use to the entity. | No requirement similar to that under IFRS Standards. |
| Reversal of impairment losses | Require reversal of impairment losses and corresponding increases in inventory up to the original carrying value. | Prohibit any reversal of impairment losses. |

1.5 Intangible Assets

As shown in the table below, under IFRS Standards, development costs are recognized as assets if certain criteria are met, while under U.S. GAAP, development costs are usually expensed as incurred.

| Topic | IFRS Standards (IAS 38) | U.S. GAAP (ASC 350, ASC 985-20) |
|---|--|--|
| Development costs | <p>Regardless of the type of cost and industry, an entity capitalizes development costs only when it can demonstrate all the following criteria:</p> <ul style="list-style-type: none"> • The technical feasibility of completing the intangible asset so that it will be available for use or sale. • The entity's intention to complete the intangible asset and use or sell it. • The entity's ability to use or sell the intangible asset. • How the intangible asset will generate probable future economic benefits (e.g., the entity can demonstrate a market for the output). • The availability of adequate technical, financial, and other resources to complete the intangible asset's development and to use or sell it. • The entity's ability to reliably measure the intangible asset's costs during its development. | <p>Development costs are generally expensed as incurred. An exception to that principle exists for software costs:</p> <ul style="list-style-type: none"> • Costs to develop computer software for external use are capitalized once technological feasibility is established in accordance with the criteria in ASC 985-20. • For development costs of internally used software, only those costs incurred during the application development stage may be capitalized. |
| Initial measurement — in-process research and development (IPR&D) costs | Permit capitalization of IPR&D costs in an asset acquisition or a business combination. | Permit capitalization of IPR&D costs only when acquired in a business combination. |
| Subsequent measurement — revaluation | Intangible assets may be revalued to fair value if fair value can be measured reliably in an active market. Revaluation changes are recognized directly in equity and are required for all assets in the same class if an active market exists. | Intangible assets are carried at their historical costs, and revaluation is not permitted. |

1.6 Property, Plant, and Equipment

The table below shows that differences exist between IFRS Standards and U.S. GAAP in several key areas of property, plant, and equipment (PP&E), including (1) borrowing costs that can be included in the cost of the PP&E, (2) revaluation, and (3) component depreciation.

| Topic | IFRS Standards (IAS 16, IAS 23, IAS 40) | U.S. GAAP (ASC 360, ASC 835-20) |
|-------------------------------------|--|---|
| Borrowing costs — length of time | Require capitalization of interest if the time to get assets ready for their intended use or sale is substantial (interpreted to mean at least one year). | Require capitalization of interest costs while a qualifying asset is being prepared for its intended use, regardless of the length of time needed to get the asset ready. |
| Borrowing costs — qualifying assets | Qualifying assets exclude equity method investments. Borrowing costs for the funding of construction activities in equity-accounted vehicles cannot be capitalized because investments in associates are financial assets. | Qualifying assets under U.S. GAAP include: <ul style="list-style-type: none"> • Assets that are constructed or produced for an entity's own use. • Assets intended for sale or lease that are constructed or produced as discrete projects (e.g., a building or a ship). • Investments accounted for under the equity method while the investee has activities in progress necessary to commence its planned principal operations, provided that the investee's activities include the use of funds to acquire qualifying assets for its operations. |

(Table continued)

| Topic | IFRS Standards (IAS 16, IAS 23, IAS 40) | U.S. GAAP (ASC 360, ASC 835-20) |
|--------------------------------------|---|---|
| Borrowing costs — acquisition | <p>Borrowing costs that are directly attributable to the acquisition, construction, or production of a qualifying asset are included in the cost of that asset.</p> <p>Such borrowing costs are capitalized as part of the cost of the asset when it is probable that they will result in future economic benefits to the entity and the costs can be measured reliably.</p> <p>Borrowing costs include:</p> <ul style="list-style-type: none"> • Interest expense calculated by using the effective interest method. • Finance charges related to finance leases. • Exchange differences arising from foreign currency borrowings when they are regarded as an adjustment to interest costs. <p>IAS 23 states that “[a]n entity shall recognise other borrowing costs as an expense in the period in which it incurs them.”</p> | <p>The amount of interest cost to be capitalized for qualifying assets is intended to be that portion of the interest cost incurred during the assets’ acquisition periods that theoretically could have been avoided if expenditures for the assets had not been made.</p> |
| Subsequent measurement — revaluation | <p>PP&E and investment properties may be revalued to fair value if fair value can be measured reliably.</p> <p>For PP&E, changes are recognized directly in equity and are required for all assets in the same class. For investment properties, revaluation changes are recognized in the income statement.</p> | <p>Properties are carried at their historical costs, and revaluation is not permitted.</p> |
| Component depreciation | <p>An item of PP&E that consists of several components that have different useful lives (or patterns of consumption if applicable) must be depreciated separately.</p> <ul style="list-style-type: none"> • Investment property that is subject to revaluation through profit and loss does not need to be broken down into components or separately depreciated. • Composite depreciation is not an acceptable method for depreciation. | <p>Do not require but consider it acceptable. Using a higher level unit of account is acceptable, including using composite depreciation, which is common in certain industries, such as utilities and railroads. Under the composite approach, no gain or loss is generally recognized at the time of disposal or retirement of an item of PP&E; instead, the net book value is offset against accumulated depreciation. Generally, depreciation of an asset that consists of several components is calculated by using one blended depreciation rate.</p> |

1.7 Impairment of Assets

This section includes the impairment tests for noncurrent tangible and intangible assets, indefinite-lived intangible assets, and goodwill. Under both IFRS Standards and U.S. GAAP, assets may be tested individually or as a group, depending on whether largely independent cash flows attributable to the assets exist. The groupings may differ under IFRS Standards and U.S. GAAP owing to how they are defined. Under both IFRS Standards and U.S. GAAP, indefinite-lived intangibles, PP&E, and goodwill are each tested for impairment. As shown in the table below, under U.S. GAAP, an entity must use a two-step impairment testing model with an optional step 0 qualitative analysis, while under IFRS Standards, an entity must use a model that has only one step (without an optional qualitative assessment). Also, under IFRS Standards, reversal of impairment losses can occur, but such impairment loss reversals are not permitted under U.S. GAAP.

| Topic | IFRS Standards (IAS 36) | U.S. GAAP (ASC 350, ASC 360, ASC 985-20) |
|--|--|---|
| Asset assignment for impairment testing — PP&E | Assets are tested at the cash-generating unit (CGU) level or at the individual asset level, depending on an analysis of the cash inflows from assets being tested that are largely independent of the cash inflows from other assets or groups of assets. | Assets are tested at the asset group or the individual asset level, depending on an analysis of the interdependence of the cash flows. The assessment of independent cash flows is generally based on the net cash flows, while under IFRS Standards, the focus is exclusively on whether cash inflows are largely independent. Note that the resulting outcomes would often be the same; however, they are described differently in the guidance under the two sets of standards. |
| Impairment — PP&E and finite-lived intangible assets | If impairment indicators exist, an entity takes a one-step approach to calculating a CGU impairment: <ul style="list-style-type: none"> • The amount by which the carrying value of the asset or CGU exceeds the recoverable amount is recorded as an impairment loss. The recoverable amount for impairment (whether PP&E, intangibles, or goodwill) is defined as the greater of: <ul style="list-style-type: none"> ◦ The fair value less costs to sell the asset or CGU. ◦ The sum of future discounted cash flows, including disposal value (also referred to as the value in use). | If impairment indicators exist, an entity takes a two-step approach to calculating an asset or asset group impairment: <ol style="list-style-type: none"> 1. The carrying amount is compared with the sum of future undiscounted cash flows. If the carrying amount is not recoverable, an impairment loss is calculated on the basis of step 2. 2. The amount by which the carrying value exceeds the fair value is recorded as an impairment loss. |
| Impairment — indefinite-lived intangible assets | Indefinite-lived intangible assets are analyzed to determine whether there are individual cash inflows that are largely independent of other cash flows. | Indefinite-lived intangible assets should be individually tested for impairment. |

(Table continued)

| Topic | IFRS Standards (IAS 36) | U.S. GAAP (ASC 350, ASC 360, ASC 985-20) |
|---|--|---|
| Impairment — indefinite-lived intangible assets (continued) | <p>Step 0 is not an option; however, an entity can carry forward the most recent quantitative assessment as long as indefinite-lived intangible assets meet certain criteria.</p> <p>The entity uses a one-step approach in which it tests the indefinite-lived intangible asset at the individual asset level unless the indefinite-lived intangible asset does not generate cash inflows that are largely independent of other cash inflows, and then the entity would test it at the CGU level.</p> <p>If the entity tests the indefinite-lived intangible asset at the CGU level, it does so by comparing the CGU's carrying amount, including goodwill and indefinite-lived intangible assets, with its recoverable amount.</p> <p>If the indefinite-lived intangible asset generates cash flows that are largely independent of other cash flows, the entity compares the indefinite-lived intangible asset's carrying amount with its recoverable amount to calculate impairment.</p> | <p>An entity can perform a qualitative assessment to assess impairment for indefinite-lived intangible assets. Note that an indefinite-lived intangible asset cannot be tested in conjunction with goodwill.</p> <ul style="list-style-type: none"> • For indefinite-lived intangible assets, the entity compares carrying value with fair value to calculate impairment. • If the entity does not perform a qualitative step 0 test or the indefinite-lived intangible asset fails that test, the entity must test for impairment by comparing the carrying value against the fair value. If the fair value is below the carrying value, the entity records the difference as an impairment loss. <p>Note that the impairment model for indefinite-lived intangible assets differs from other impairment models required by U.S. GAAP (e.g., the one for long-lived assets under ASC 360 and the one for goodwill under ASC 350; in the latter, a two-step approach is applied).</p> |
| Impairment — allocation of goodwill | <p>An entity allocates goodwill for impairment purposes to CGUs depending on which one is expected to benefit from the goodwill.</p> <p>The entity performs a bottom-up assessment to determine the CGU. It may not be possible to allocate goodwill to individual CGUs on a reasonable basis, and it will often be the case that goodwill can be allocated only to a group of CGUs. Such an aggregation of CGUs is permitted. Paragraph 80 of IAS 36 states that “[e]ach unit or group of units to which the goodwill is so allocated shall: (a) represent the lowest level within the entity at which the goodwill is monitored for internal management purposes; and (b) not be larger than an operating segment.”</p> | <p>An entity allocates goodwill for impairment purposes to reporting units depending on which one is expected to benefit from the goodwill. A reporting unit is one level below an operating segment.</p> <ul style="list-style-type: none"> • The entity performs a top-down analysis to determine the reporting unit. • The entity may perform a qualitative assessment (i.e., step 0) for goodwill. |

(Table continued)

| Topic | IFRS Standards (IAS 36) | U.S. GAAP (ASC 350, ASC 360, ASC 985-20) |
|---|--|---|
| Impairment — goodwill ⁴ | <p>An entity performs a one-step test at least annually to compare the CGU's carrying amount, including goodwill, with the recoverable amount to arrive at the impairment loss.</p> <p>The impairment loss first reduces goodwill to zero, and if there is any additional impairment loss, the entity generally allocates it to each asset in the CGU on a pro rata basis.</p> | <p>An entity can perform a step 0 test by using qualitative factors to assess goodwill impairment (i.e., determine whether it is more likely than not that the fair value of the reporting unit exceeds its carrying amount).</p> <p>If the step 0 test is not selected or it is more likely than not that the fair value of the reporting unit is less than its carrying amount, the entity performs step 1 of the two-step test: It performs the recoverability test first at the reporting unit level (it compares the reporting unit's carrying amount with its fair value). If the fair value of the reporting unit is lower than its carrying amount, the entity performs step 2.</p> <p>In step 2, if the carrying amount of the reporting unit's goodwill exceeds its implied fair value, the entity recognizes an impairment loss in an amount equal to that excess.</p> |
| Subsequent reversal of an impairment loss | Require for all assets, other than goodwill, if certain criteria are met. | Prohibit. |

⁴ In January 2017, the FASB issued [ASU 2017-04](#), which simplifies the accounting for goodwill impairments by eliminating step 2 from the goodwill impairment test. Instead, if "the carrying amount of a reporting unit exceeds its fair value, an impairment loss shall be recognized in an amount equal to that excess, limited to the total amount of goodwill allocated to that reporting unit." Upon the adoption of ASU 2017-04, this difference in how goodwill impairment testing is performed under the two sets of standards will be no longer be applicable.

Chapter 2 — Liabilities

2.1 Employee Benefits

The accounting for defined contribution and defined benefit plans is very similar under IFRS Standards and U.S. GAAP. For defined contribution plans, the cost recognized is the contribution due from the employer, and for defined benefit plans, the defined benefit obligation is the present value of benefits accrued for service. Outlined in the table below are the key differences between the two frameworks.

| Topic | IFRS Standards (IAS 19, IFRIC® Interpretation 14) | U.S. GAAP (ASC 420, ASC 710, ASC 712, ASC 715) |
|--|--|--|
| Accounting for termination benefits | Make no distinction between different types of termination benefits and provide more general recognition criteria than do U.S. GAAP. | Categorize termination benefits into several types (e.g., special, contractual, or one-time benefit arrangements), each with its own recognition criteria. |
| Long-term postemployment benefits | Measure at present value according to a simplified method of accounting that is similar to that often used to measure postemployment benefits under U.S. GAAP. Under this method, remeasurements are not recognized in other comprehensive income (OCI). | Usually measure nonretirement postemployment benefits on a present value basis. Many other long-term employee benefits described in IFRS Standards are not addressed by U.S. GAAP guidance on compensation. |
| Recognition of prepaid benefit assets | A net defined benefit asset is subject to a "ceiling." | There is no limitation on the amount of the net pension asset that can be recognized on the balance sheet. |
| Minimum funding requirements | To the extent that the contributions payable will not be available after they are paid into the plan, an entity must recognize a liability when the contribution arises. | Do not require recognition of a liability for minimum funding requirements. |
| Recognition of past service cost | Recognize past service cost (equivalent to "prior service cost") immediately in profit or loss. | Initially recognize prior service cost in OCI and then amortize it into income over the plan participants' remaining service periods (or life expectancy if all, or almost all, of the participants are inactive). |
| Expected return on plan assets and net interest method | Require use of the net interest method to recognize interest on the net defined benefit liability or asset, which results in a net interest cost or income depending on whether the plan is in a deficit or surplus. | An expected return on plan assets is a component of net periodic benefit cost. For a funded plan, this difference will often result in less periodic benefit cost under U.S. GAAP than under IFRS Standards because the expected rate of return on plan assets typically would be higher than the discount rate. |

(Table continued)

| Topic | IFRS Standards (IAS 19, IFRIC Interpretation 14) | U.S. GAAP (ASC 420, ASC 710, ASC 712, ASC 715) |
|--|---|--|
| Recognition of actuarial gains and losses | An entity must immediately recognize all actuarial gains and losses in OCI. Those amounts are not recycled to profit or loss in future periods. | An entity may elect an accounting policy to (1) recognize actuarial gains and losses in OCI and then amortize them into the income statement in subsequent periods or (2) immediately recognize all such gains and losses through the income statement. |
| Accounting for defined benefit plan curtailments | <p><i>Recognition</i> — A curtailment gain or loss is recognized when the event that causes the curtailment occurs.</p> <p><i>Measurement</i> — Measurement of a curtailment gain or loss is the change in the present value of the defined benefit obligation resulting from the curtailment.</p> | <p><i>Recognition</i> — A curtailment gain is recognized when the related employees are terminated or the entity adopts the related plan amendment, while a curtailment loss is recognized when the loss is probable.</p> <p><i>Measurement</i> — A curtailment gain or loss is made up of a portion of unamortized net prior service cost or credit, any remaining net transition obligation, and the change in the benefit obligation exceeding any offsetting unamortized actuarial gain or loss.</p> |
| Multiemployer plans | May classify as either defined contribution or defined benefit plans depending on the economic substance of the plans' terms. However, if defined benefit accounting is not possible, the plans are treated as defined contribution plans with additional disclosures. | Classify as defined contribution plans. |
| Discount rate for defined benefit obligation | The selected discount rate should be determined at the end of the reporting period on the basis of market yields on high-quality corporate bonds. When there is no deep market in such bonds, government bonds are used. Under IFRS Standards, high-quality corporate bonds are selected on a more systematic basis than under U.S. GAAP. | The selected discount rate should reflect the rates at which the benefits can be effectively settled by using high-quality bonds (e.g., those rated AA or AAA). U.S. GAAP do not address an instance when there is no deep market in high-quality corporate bonds. U.S. GAAP allow for the "cherry picking" of high-quality corporate bonds to match the currency and maturity of the pension obligation. |
| Actuarial valuation method for deferred compensation plans | Use the unit credit method. | Depend on the characteristics of a plan's benefit formula. |

2.2 Contingencies

IFRS Standards and U.S. GAAP include similar fundamental concepts regarding the accounting for contingencies in that both frameworks require the recognition of a loss contingency on the basis of the probability of occurrence. However, a difference exists between the two sets of standards in the interpretation of the word “probable,” which could lead to a difference in when companies record loss contingencies. In addition, the measurement of a loss contingency may vary under IFRS Standards and U.S. GAAP given that each framework uses a different reference point in the evaluation of a range of possible outcomes.

The table below further outlines the differences between IFRS Standards and U.S. GAAP regarding the accounting for contingencies.

| Topic | IFRS Standards (IAS 37) | U.S. GAAP (ASC 450, ASC 410, ASC 420) |
|--|---|--|
| Recognition threshold — interpretation of “probable” | A loss must be probable to be recognized. “Probable” is interpreted as “more likely than not.” In practice, “more likely than not” refers to a probability of greater than 50 percent. | A loss must be probable to be recognized. “Probable” is interpreted as “likely to occur.” No percentage is ascribed to “probable.” In practice, “probable” is interpreted as connoting a higher percentage than that under IFRS Standards (e.g., 70 percent or higher). |
| Initial measurement | When there is a range of possible outcomes and each point is as likely as the other points, the midpoint of the range should be used for initial measurement. | An entity should reference applicable U.S. GAAP for specific obligations (e.g., asset retirement, environmental, restructuring) as necessary to determine measurement. When there is a range of possible outcomes and each point is as likely as the other points, the low end of the range is used to measure the contingency. |
| Discounting | The loss contingency should be the present value of the cost required to settle the obligation, discounted by using a pretax discount rate that reflects both (1) the time value of money and (2) the risks specific to the liability. Discounting is required even if the timing of the outflows is not fixed or determinable. | In general, do not require discounting of loss contingencies. However, for certain obligations for which the timing and amounts of outflows are fixed or reliably determinable (e.g., asset retirement obligations), a risk-adjusted rate is used to discount the obligation. |

2.3 Debt Modifications and Extinguishments

The accounting for a modification or an exchange of a financial liability differs between IFRS Standards and U.S. GAAP, as shown in the table below. For example, under U.S. GAAP, the creditor must assess whether the restructuring constitutes a troubled debt restructuring. IFRS Standards do not provide such guidance.

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 470-50, ASC 470-60) |
|---|---|--|
| Exchange or modification of a financial liability | When the existing borrower and lender exchange instruments with terms that are substantially different, the exchange is accounted for as an extinguishment of the original liability and a recognition of a new liability. Similarly, a modification of the terms of a liability is accounted for as an extinguishment of the original liability and a recognition of a new liability when the modification is substantial. The terms are considered substantially different if the discounted present value of the cash flows under the modification (including any fees paid net of any fees received and discounted by using the original effective interest rate) is at least 10 percent different from the discounted present value of the remaining cash flows of the original financial liability. | "[A]n exchange of debt instruments between or a modification of a debt instrument by a debtor and a creditor in a nontroubled debt situation is deemed to have been accomplished with debt instruments that are substantially different if the present value of the cash flows under the terms of the new debt instrument is at least 10 percent different from the present value of the remaining cash flows under the terms of the original instrument." (ASC 470-50-40-10) Further, "[t]he change in the fair value of an embedded conversion option resulting from an exchange of debt instruments or a modification in the terms of an existing debt instrument shall not be included in the 10 percent cash flow test. Rather, a separate test shall be performed by comparing the change in the fair value of the embedded conversion option to the carrying amount of the original debt instrument immediately before the modification." (ASC 470-50-40-12(g)) |
| Third-party costs | Third-party costs are (1) included in the extinguishment gain or loss if extinguishment accounting applies and (2) amortized over the term of the new debt instrument if extinguishment accounting does not apply. | Third-party costs are (1) amortized over the term of the new debt instrument if extinguishment accounting applies and (2) expensed as incurred if extinguishment accounting does not apply. |
| Accounting for a modification or an exchange of financial liability that does not result in derecognition | "Upon modification or exchange (together referred to as a 'modification') of a financial liability that does not lead to derecognition, the revised cash flows as a result of the modification should be discounted at the date of the modification at the original effective interest rate (EIR). The difference between the carrying amount of the liability immediately before the modification and the sum of the present value of the cash flows of the modified liability discounted at the original EIR should be recognised in profit or loss as a modification gain or loss." (paragraph 4.2.1 of Chapter 8, Volume B, of Deloitte's iGAAP publication) | "If it is determined that the original and new debt instruments are not substantially different, then a new effective interest rate shall be determined based on the carrying amount of the original debt instrument, adjusted for an increase (but not a decrease) in the fair value of an embedded conversion option (calculated as the difference between the fair value of the embedded conversion option immediately before and after the modification or exchange) resulting from the modification, and the revised cash flows." (ASC 470-50-40-14) |

(Table continued)

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 470-50, ASC 470-60) |
|------------------------------|---|--|
| Troubled debt restructurings | Debtors apply the same guidance to troubled debt restructurings that they apply to other exchanges and modifications of debt instruments. | "A restructuring of a debt constitutes a troubled debt restructuring . . . if the creditor for economic or legal reasons related to the debtor's financial difficulties grants a concession to the debtor that it would not otherwise consider." (ASC 470-60-15-5) Debtors subject to the troubled debt restructuring guidance recognize a gain only when "the total future cash payments specified by the new terms of a payable, including both payments designated as interest and those designated as face amount, are less than the carrying amount of the payable." (ASC 470-60-35-6) |

2.4 Distinguishing Liabilities From Equity

The models for distinguishing liabilities from equity differ between IFRS Standards and U.S. GAAP. IFRS Standards focus on the substance of the contractual terms of a financial instrument rather than on its form. Under IFRS Standards, a financial instrument or its component parts should be classified upon initial recognition as a financial liability or an equity instrument according to (1) the substance of the contractual arrangement, rather than its legal form, and (2) the definitions of a financial asset, a financial liability, and an equity instrument. If a financial instrument contains both a liability and an equity component, those components should be classified and accounted for separately (split accounting). U.S. GAAP contain several accounting models for determining the appropriate classification of a financial instrument or its component parts as liabilities or equity; these models differ depending on the specific fact pattern. The table below summarizes the key differences when an entity is distinguishing liabilities from equity under IFRS Standards and U.S. GAAP.

| Topic | IFRS Standards (IAS 32) | U.S. GAAP (ASC 480-10, ASC 470-20) |
|------------------------------|--|---|
| Redeemable equity securities | Puttable or contingently redeemable equity securities typically are classified as liabilities, with some exceptions. There is no temporary (or "mezzanine") equity presentation. | Puttable or contingently redeemable equity securities typically are classified as equity or, by SEC registrants, as mezzanine equity, since redemption is not certain to occur. |
| Compound instruments | Compound instruments (e.g., convertible debt instruments) are typically split into separate components. | U.S. GAAP do not have a generally applicable split accounting requirement for compound instruments. Nevertheless, U.S. GAAP do require some instruments to be separated into liability and equity components, such as certain cash-settled convertible debt and instruments with beneficial conversion features. |

(Table continued)

| Topic | IFRS Standards (IAS 32) | U.S. GAAP (ASC 480-10, ASC 470-20) |
|---|---|---|
| Obligations to repurchase shares | Contracts that embody an obligation to repurchase the issuer's equity shares by transferring assets are accounted for at the present value of the redemption amount if the issuer could be required to physically settle the contract by transferring assets in exchange for shares (e.g., a forward purchase or written put option contract that gives the counterparty the right to require either physical or net settlement). | Physically settled forward-purchase contracts that embody an obligation to repurchase the issuer's equity shares for cash are accounted for at either the present value of the redemption amount or the settlement value. Other physically settled contracts that embody an obligation to repurchase the issuer's equity shares by transferring assets (e.g., a physically settled written put option or a forward purchase contract that provides the counterparty with a right to require either physical or net settlement) are accounted for at fair value. |
| Obligations to issue a variable number of equity shares | Contracts that will be settled in a variable number of shares are accounted for as assets or liabilities. | A financial instrument that embodies an unconditional obligation, or a financial instrument other than an outstanding share that embodies a conditional obligation, that the issuer must or may settle by delivering a variable number of equity shares is classified as an asset or a liability if, at inception, the obligation's monetary value is based either solely or predominantly on (1) a fixed monetary amount, (2) variations in something other than the fair value of the issuer's equity shares, or (3) variations inversely related to changes in the fair value of the issuer's equity shares. |

Chapter 3 — Revenues and Expenses

3.1 Revenue Recognition

In May 2014, the IASB and the FASB issued their final standard on revenue from contracts with customers. The standard outlines a single comprehensive model for entities to use in accounting for revenue from contracts with customers and supersedes most legacy revenue recognition guidance, including industry-specific guidance.

The goals of the revenue recognition project were to clarify and converge the revenue recognition principles under IFRS Standards and U.S. GAAP and to develop guidance that would streamline and enhance revenue recognition requirements while also providing “a more robust framework for addressing revenue issues.”

As a result, IFRS Standards and U.S. GAAP are largely converged in this area. The table below outlines some of the key remaining differences, including a lower collectibility threshold under IFRS Standards and additional accounting policy elections available only under U.S. GAAP that permit entities to exclude shipping and handling activities and sales (and other similar) taxes from their assessment of performance obligations and transaction price, respectively.

| Topic | IFRS Standards (IFRS 15) | U.S. GAAP (ASC 606) |
|---|--|--|
| The collectibility threshold for contracts (step 1 — qualification of a contract for revenue recognition) | Establish a <i>probable</i> collectibility threshold, meaning “more likely than not.” | Establish a <i>probable</i> collectibility threshold, meaning “likely to occur” (a higher threshold than “more likely than not”). |
| Reversal of impairment losses | An entity is required to reverse an impairment loss on capitalized costs to obtain or fulfill a contract. | An entity cannot reverse an impairment loss on capitalized costs to obtain or fulfill a contract. |
| Licensing — determining the nature of an entity’s promise | An entity’s determination of whether a license is a right to use (for which revenue is recognized at a point in time) versus a right to access (for which revenue is recognized over time) is based on whether the customer can direct the use of, and obtain substantially all of the benefits from, the license at the point in time the license is granted. The customer can direct the use of, and obtain substantially all of the benefits from, the license (and thus has a right to use) if the underlying intellectual property (IP) is not significantly affected by the entity’s ongoing activities. | An entity’s determination of whether a license is a right to use versus a right to access is based on its classification of the IP underlying the license as either functional (right to use) or symbolic (right to access). |

(Table continued)

| Topic | IFRS Standards (IFRS 15) | U.S. GAAP (ASC 606) |
|--|--|---|
| Licensing — renewals | The “use and benefit” guidance does not explicitly refer to renewals; as a result, revenue may be recognized earlier than it would be under U.S. GAAP. | A renewal or extension is subject to the “use and benefit” guidance in ASC 606-10-55-58C, the application of which will generally result in revenue recognition at the beginning of the renewal period. |
| Shipping and handling activities | Do not provide an accounting policy election. If an entity performs shipping and handling services after the customer has obtained control of the related good, the shipping and handling activities will typically be accounted for as a separate performance obligation. | Provide an accounting policy election that permits an entity to account for shipping and handling activities that occur after the customer has obtained control of the related good as a fulfillment expense. |
| Noncash consideration | Do not prescribe a measurement date or clarify when the variable consideration guidance applies. | Require measurement at contract inception. The guidance on variable consideration applies only to variability resulting from reasons other than the form of the noncash consideration. |
| Presentation of sales (and other similar) taxes | Do not provide an accounting policy election. An entity is required to identify whether it has a primary responsibility to pay the taxes or is acting only as a collection agent. If it is the primary obligor, it must include those taxes in the transaction price. | Provide an accounting policy election that permits an entity to exclude all sales (and other similar) taxes from the measurement of the transaction price. |
| Provisions for losses on construction-type and production-type contracts | Unclear about whether the onerous test should be performed at the contract or performance obligation level. | Clarify that provisions for losses on construction-type and production-type contracts may be determined at either the contract or performance obligation level. |

3.2 Share-Based Payments

IFRS 2 and ASC 718 share the same principles-based approach and are largely converged. However, there are some differences in the application of those principles, as shown in the table below.

| Topic | IFRS Standards (IFRS 2) | U.S. GAAP (ASC 718) |
|---|--|--|
| Measurement of equity-settled share-based payments | Awards issued to nonemployees in exchange for services that are similar to employee services are measured on the same basis as employee awards (i.e., a grant-date fair-value-based measure). Share-based payment awards issued to nonemployees in exchange for goods or for services that are not similar to employee services are measured as of the date the entity obtains the goods or the counterparty renders the service. The awards should be measured on the basis of the fair value of the goods or services received unless that fair value cannot be estimated reliably. If the entity cannot estimate reliably the fair value of the goods or services received, the entity should measure their value by reference to the fair value of the equity instruments granted. However, there is a rebuttable presumption that the fair value of the goods or services received can be estimated reliably. | The measurement date is generally the date on which the equity-classified awards are granted. |
| Modification accounting — awards for which vesting is improbable but becomes probable | Compensation cost is recognized on the basis of the grant-date fair value of the original award plus the incremental value of the modified award on the modification date. | Compensation cost is recognized on the basis of the modified award's fair-value-based measure as of the modification date. |
| Graded vesting awards with only service conditions | Recognize and measure only as, in substance, multiple awards. | An accounting policy election is made to treat graded vesting awards as either a single award (straight-line cost recognition) or, in substance, multiple awards for both recognition and measurement. |
| Performance targets satisfied after the requisite service period | Treated as a nonvesting condition. Therefore, the condition is reflected in the awards' fair-value-based measure. | Treated as a performance condition that is a vesting condition. Therefore, the performance target should not be directly reflected in the awards' fair-value-based measure. |
| Classification — bearing the risks and rewards of ownership for a reasonable period | A share-based payment award that can be redeemed for cash at fair value at the employee's option must be classified, at least in part, as a liability. | A share-based payment award that could be cash settled at the employee's option does not have to be classified as a liability if it requires the employee to bear the risks and rewards of share ownership for a period of at least six months after completing the requisite service. |

(Table continued)

| Topic | IFRS Standards (IFRS 2) | U.S. GAAP (ASC 718) |
|---|--|---|
| Modification accounting — equity to liability | Any excess is recognized in additional paid-in capital (APIC). The same holds true if the fair value of a modified award is less than or equal to the fair value of the original award (the offsetting amount is recorded to APIC). | Any excess of the fair value of the modified award over the grant-date fair value of the original award is recorded as additional compensation cost. When the fair value of a modified award is less than or equal to the grant-date fair value of the original award, the offsetting amount is in APIC. |
| Modification accounting — liability to equity | As of the date of the modification, the existing liability is derecognized. The fair value of the equity instruments granted at the modification date is recognized in equity to the extent to which goods or services have been received. Any difference between the liability derecognized and the amount recognized in equity is reflected immediately in the income statement. | Upon modification, the liability is reclassified to equity. To the extent that the fair value of the modified award is less than the fair value of the liability at the time of the modification, the difference is deemed to be a capital contribution and recognized in equity. If the fair value of the modified award is higher than the liability, the excess is generally recognized as compensation expense prospectively over the remaining requisite service period. |
| Liability classification — share-based payment arrangements | Focus on whether the award can be cash settled. | More detailed requirements that may result in the classification of more share-based arrangements as liabilities. |
| Recognition of payroll taxes | If taxes on an employer's payroll are related to a stock-based compensation plan, an entity expenses them in the income statement when it recognizes the related expense. To account for such payroll taxes, the entity should apply the related guidance on cash-settled share-based payments. | Under ASC 718, payroll tax liabilities related to share-based payment awards should be recognized on the date that the measurement and payment of the tax is triggered (e.g., upon exercise or vesting). |

3.3 Income Taxes

In general, the income tax accounting frameworks under both IFRS Standards and U.S. GAAP are built on the same basic principle concerning the basis of deferred tax assets (DTAs) and deferred tax liabilities (DTLs): the recognition of temporary differences between the carrying amount and tax basis of assets and liabilities in the financial statements. However, differences between IFRS Standards and U.S. GAAP remain, and some of the key ones related to recognition of DTAs, accounting for uncertain tax positions, and treatment of income tax related to share-based payments are shown in the table below.

| Topic | IFRS Standards (IAS 12, IFRIC Interpretation 23) | U.S. GAAP (ASC 740) |
|--------------------------------------|--|--|
| Recognition of DTAs | No valuation allowance concerning DTAs, which are recognized only if it is probable (more likely than not) that they will be used. | DTAs are recognized in full and then reduced by a valuation allowance if it is more likely than not that some or all of the DTAs will not be recognized. |
| Tax rate for measuring DTAs and DTLs | Enacted or "substantively" enacted tax rates are used. | Enacted tax rates are used. |

(Table continued)

| Topic | IFRS Standards (IAS 12, IFRIC Interpretation 23) | U.S. GAAP (ASC 740) |
|--|--|---|
| Uncertain tax positions | IFRIC Interpretation 23 clarifies how to apply the recognition and measurement requirements in IAS 12 when there is uncertainty over income tax treatment. If an entity concludes that it is probable that the taxation authority will accept an uncertain tax treatment, recognition and measurement are consistent with the positions as taken in the tax filings. If the entity concludes that it is not probable that the taxing authority will accept the tax treatment as filed, the entity is required to reflect the uncertainty by using (1) the most likely amount or (2) the expected value. "Probable" is defined as "more likely than not." | ASC 740 prescribes a two-step recognition and measurement approach to determining the amount of tax benefit to recognize in the financial statements. The first step is recognition: The entity determines whether it is more likely than not that a tax position will be sustained upon examination. The second step is measurement: A tax position that reaches the more-likely-than-not recognition threshold is measured to determine the amount of benefit to recognize in the financial statements. The tax position is measured at the largest amount of benefit that is greater than 50 percent likely to be realized upon ultimate settlement. |
| Deferred taxes on foreign nonmonetary assets/ liabilities when the functional currency is not the local currency and the remeasurement is based on historical exchange rates | Deferred tax is recognized on the basis differences resulting from changes in exchange rates and the indexing of basis for income tax reporting purposes. | No deferred tax is recognized on basis differences resulting from changes in exchange rates and the indexing of basis for income tax reporting purposes. |
| Other exceptions to the basic principle that deferred tax is recognized for all temporary differences | "Initial recognition" exemption — deferred tax is not recognized for taxable or deductible temporary differences that arise from the initial recognition of an asset or liability in a transaction that (1) is not a business combination and (2) at the time of the transaction does not affect accounting profit or taxable profit. Changes in this unrecognized DTA or DTL are not subsequently recognized. | No "initial recognition" exemption under U.S. GAAP. |
| Special deductions (provide tax benefits under specific tax jurisdictions for unique industries or governmental purposes) | Contain no guidance similar to that in U.S. GAAP. | Special-deduction tax benefits should not be anticipated by offsetting a DTL. Instead, such tax benefits should be recognized for financial reporting purposes no earlier than the year in which they are available to reduce taxable income on the entity's tax returns. In addition, the future tax effects of special deductions may nevertheless affect (1) the average graduated tax rate to be used in measuring DTAs and DTLs when graduated tax rates are a significant factor and (2) the need for a valuation allowance for DTAs. |

(Table continued)

| Topic | IFRS Standards (IAS 12, IFRIC Interpretation 23) | U.S. GAAP (ASC 740) |
|--|---|--|
| Share-based compensation | For awards that will give rise to a tax deduction in a later accounting period, deferred taxes are computed on the basis of the hypothetical tax deduction for the share-based payment in every period under the applicable tax law. Recognition of deferred taxes could be through either profit or loss or equity. | For awards that ordinarily give rise to a tax deduction, deferred taxes are computed on the basis of compensation expense recognized for financial reporting purposes. Tax benefits in excess of or less than the related DTA are recognized in the income statement when realized for income tax reporting purposes. ASU 2016-09 eliminated the concept of the "APIC pool." |
| Subsequent changes in deferred taxes that were originally charged or credited to equity (backward tracing) | As with the initial treatment, IAS 12 requires that the resulting change in deferred taxes also be charged or credited back directly to equity. | Backward tracing is generally prohibited. Subsequent changes to deferred taxes originally charged or credited to equity (e.g., because of a change in tax rate) are generally allocated to continuing operations, not to equity. Also, U.S. GAAP allow a one-time reclassification from accumulated other comprehensive income (AOCI) to retained earnings of "stranded" tax effects related to the change in tax rate as a result of U.S. tax reform legislation, commonly known as the Tax Cuts and Jobs Act. |
| Undistributed earnings on foreign subsidiaries | Deferred tax is recognized on the undistributed earnings of any form of investee (foreign or domestic, subsidiaries, branches, associates, and interests in joint arrangements) unless (1) the parent is able to control the timing of the temporary difference's reversal and (2) it is probable that the temporary difference will not reverse in the foreseeable future. | No deferred tax is recognized on undistributed earnings of foreign subsidiaries and corporate joint ventures (that are essentially permanent in duration) if such earnings can be demonstrated to be indefinitely reinvested. |
| Interim reporting and tax rate | Each jurisdiction computes its projected rate, and that rate must be applied in each jurisdiction to the actual year-to-date (YTD) income. The interim period tax charge is the sum of each entity's interim tax charge. If such a sum is not practicable, a weighted average of all group rates may be used if it is a reasonable approximation of the effect of using more specific rates. | The forecasted tax rate is generally computed at an entity level on the basis of the forecasted ordinary income/(loss) and associated tax expense for the entire reporting group and combined into one overall forecasted annual effective tax rate. YTD tax expense is generally calculated by multiplying the group's YTD pretax income by the group's forecasted annual effective tax rate. |

Chapter 4 — Presentation

4.1 Presentation of Financial Statements

There are many similarities between financial statement presentation under IFRS Standards and U.S. GAAP, although there are more requirements under IFRS Standards governing line items and comparative information than under U.S. GAAP. Specific presentation of particular financial statement line items is required by individual accounting guidance and SEC rules and regulations under U.S. GAAP. There is no requirement to present comparative financial information under U.S. GAAP; however, SEC regulations require comparative financial information for public registrants. Under IFRS Standards, particular financial statement line items and one year of comparative financial information are required, with certain exceptions. Under both IFRS Standards and U.S. GAAP, a complete set of financial statements consists of the following: a statement of financial position, a statement of profit or loss and OCI, a statement of cash flows and accompanying notes, and a statement of changes in shareholders' equity. The table below shows the key differences in the presentation of financial statements under IFRS Standards and U.S. GAAP.

| Topic | IFRS Standards (IAS 1) | U.S. GAAP (ASC 205-10, ASC 220-10, ASC 505-10, ASC 810-10) and SEC Regulation S-X |
|--|---|--|
| Comparative financial statements | Require one year of comparative financial information. | No specific requirement under U.S. GAAP to present comparative financial statements. Generally, at least one year of comparative financial information is presented. Public companies are subject to SEC rules and regulations, which usually require two years of comparative financial information for the income statement and the statements of equity and cash flows. |
| Restatement of comparative information following change in accounting policy, correction of an error, or reclassification of items | Require statement of financial position as at the beginning of the preceding period. | No requirement. |
| Debt classification — subsequent events | Events that take place after the reporting date (refinancing, covenant violation waiver, and so forth) are generally not considered in the classification of debt as of the reporting date. | Events that take place after the reporting date (refinancing, covenant violation waiver, and so forth) are generally considered in the classification of debt as of the reporting date. |

(Table continued)

| Topic | IFRS Standards (IAS 1) | U.S. GAAP (ASC 205-10, ASC 220-10, ASC 505-10, ASC 810-10) and SEC Regulation S-X |
|---|--|---|
| Debt classification — violation of loan covenants as of the reporting date whereby a long-term loan becomes payable on demand | Classify debt as a current liability. | Classify such debt as a noncurrent liability if the lender provides a qualifying covenant waiver before the financial statements are issued. |
| Classification — expenses | An entity may present its expenses either by function or nature. Certain disclosures are required if the entity chooses to present the expenses by function. | An entity may present its income statement in (1) a single-step format (all expenses are classified by function and deducted from total income to arrive at income before tax) or (2) a multiple-step format (operating and nonoperating expenses are separated before presenting income before tax). |

4.2 Noncurrent Assets Held for Sale and Discontinued Operations

Though the accounting for noncurrent assets held for sale and that for discontinued operations are similar under IFRS Standards and U.S. GAAP, the table below shows there is a special treatment for assets held for distribution under IFRS Standards.

| Topic | IFRS Standards (IFRS 5) | U.S. GAAP (ASC 360-10, ASC 205-20) |
|--|--|---|
| Assets held for distribution to owners | A long-lived asset to be distributed to owners is measured at fair value less costs to sell in a manner similar to assets held for sale. | ASC 360-10-45-15 states that a long-lived asset to be distributed to owners “shall continue to be classified as held and used until it is disposed of.” Therefore, it is measured at cost less accumulated depreciation and impairment. |

4.3 Statement of Cash Flows

IFRS Standards and U.S. GAAP contain similar guidance on presentation in the statement of cash flows, including the requirement to separate cash flows into operating, investing, and financing activities. Both also allow the use of the direct or indirect method of presenting cash flows from operating activities. However, there are a number of differences between the two sets of standards regarding presentation in the statement of cash flows, and they are shown in the table below.

| Topic | IFRS Standards (IAS 1, IAS 7) | U.S. GAAP (ASC 230-10) |
|---|---|---|
| Scope | Require all entities to present a statement of cash flows (i.e., there are no scope exceptions). | Require entities to present a statement of cash flows with the following exceptions: certain trust funds; a common trust fund, variable annuity account, or similar fund maintained by a bank, insurance entity, or other entity in its capacity as a trustee, administrator, or guardian for the collective investment and reinvestment of funds; and certain investment companies. |
| Method of reporting cash flows from operating activities | Allow use of the direct or indirect method. Net income must be reconciled to net cash flows from operating activities only under the indirect method. | Allow use of the direct or indirect method. Under both methods, net income must be reconciled to net cash flows from operating activities. |
| Presentation of components of transactions with characteristics of more than one category of cash flows | Classify individual components of a single transaction separately as operating, investing, or financing, depending on the nature of the transaction. | An entity first needs to determine whether there are separately identifiable cash flows within a specific transaction. If so, the entity presents such cash flows on the basis of their nature within operating, investing, or financing activities. In the absence of separately identifiable cash flows, the entity would present such cash flows collectively on the basis of the predominant source or use of the cash flows. |
| Disclosure of cash flows pertaining to discontinued operations | Require disclosure of cash flows from discontinued operations under each category either on the face of the cash flow statement or in the notes. These disclosures are not required for disposal groups that are newly acquired subsidiaries that meet the criteria to be classified as held for sale on acquisition. | An entity must disclose either of the following if it is not already presented on the face of the cash flows statement: <ul style="list-style-type: none"> • The total operating and investing cash flows of the discontinued operation. • The depreciation, amortization, capital expenditures, and significant operating and investing noncash items of the discontinued operation. |

(Table continued)

| Topic | IFRS Standards (IAS 1, IAS 7) | U.S. GAAP (ASC 230-10) |
|---|---|--|
| Presentation of cash flow per share on the face of the financial statements | Do not explicitly prohibit disclosure of cash flow per share. | Prohibit an entity from reporting cash flow per share. |
| Taxes paid | Classify as operating activities unless they can be specifically identified within financing and investing activities. | Classify as operating activities. |
| Interest and dividends paid and received | <p>Permit presentation of interest received and dividends received as operating or investing.</p> <p>Permit presentation of interest paid and dividends paid as operating or financing.</p> <p>Require cash flows from interest and dividends received and paid to be disclosed separately.</p> | <p>Classify interest paid and received as operating activities.</p> <p>Generally classify dividends received as operating activities because these are considered to be returns on an entity's investment.</p> <p>Classify dividends paid as financing activities.</p> |
| Contingent consideration payments made after the date of a business combination | An entity should assess the nature of the transaction on the basis of the general principles of classification of the cash flows as operating or financing activities. | Contingent consideration payments that are not made soon after the acquisition date must be classified as financing activities; any excess cash payments will be classified as operating activities. Cash payments made soon after the acquisition date in a business combination transaction must be classified as investing activities. |
| Remittances of statutory withholdings on share-based payment awards | An entity should assess the nature of the transaction on the basis of the general principles of classification of the cash flows as operating or financing, as well as the applicable noncash activity disclosures. | Cash payments to tax authorities in connection with shares withheld to meet statutory tax withholding requirements should be presented as financing activities. |
| Leases | As noted in the “Lessee’s subsequent accounting for right-of-use (ROU) asset and lease expense” provision below, a lessee is required to use a single approach (similar to the FASB’s finance lease approach) to subsequently account for the ROU asset. For this reason, the lessee should account for payments of interest as either a financing or an operating activity in the statement of cash flows, depending on the lessee’s accounting policy election under IAS 7. | A lessee should present payments associated with operating leases as an operating activity in the statement of cash flows. A lessee should present payments associated with finance leases in the statement of cash flows as (1) a financing activity, for the principal portion of the payment, and (2) an operating activity, for the interest portion of the payment. |

4.4 Changes in Accounting Principle, Changes in Accounting Estimate, and Error Corrections

Although the concepts and accounting treatment of (1) changes in accounting principle, (2) changes in accounting estimate, and (3) error corrections are similar under IFRS Standards and U.S. GAAP, the table below shows that there are some notable differences in terminology and disclosure requirements.

| Topic | IFRS Standards (IAS 8, IAS 34) | U.S. GAAP (ASC 250, ASC 270) |
|--|---|---|
| Changes in Accounting Principle (Policy) | | |
| Indirect effects of a change in accounting principle (policy) | Do not provide guidance on accounting for or disclosing the indirect effects of a change in accounting policy. | Indirect effects of a change in accounting principle that are incurred and recognized are recorded in the period of change. Certain disclosures are also required. |
| Preferability | Do not use the term “preferability.” However, there is a similar concept: Paragraph 14(b) of IAS 8 states that a voluntary change in accounting policy can be made only if it “results in the financial statements providing reliable and more relevant information about the effects of transactions, other events or conditions on the entity’s financial position, financial performance or cash flows.” | A voluntary change in accounting policy must be justified on the basis that the new accounting principle is preferable. |
| Balance sheet presentation when there is a retrospective change | An entity must present the beginning balance sheet of the preceding period. | Do not require an entity to present the beginning balance sheet of the preceding period. |
| Disclosures: subsequent-period disclosures for a change in accounting principle (policy) | Do not require disclosures for changes in accounting policies to be repeated in subsequent periods. | Do not require disclosures to be repeated in subsequent periods unless the change is reasonably certain to have a material effect in later periods. In that case, an entity must provide certain disclosures whenever it presents the financial statements for the period of change. |
| Disclosures: interim-period disclosures for changes in accounting principle (policy) | An entity must disclose the differences between accounting policies in the current interim period compared with the most recent annual financial statements. At a minimum, the entity is required to describe the nature and effect of the change; however, unlike U.S. GAAP, IFRS Standards do not specify the level of disclosure detail required. | An entity must disclose any changes in accounting principles in the current interim period compared with (1) the comparable interim period of the prior annual period, (2) the preceding interim periods in the current annual period, and (3) the prior annual report. Certain disclosures also are required by ASC 250-10-50-3. |
| Changes in Accounting Estimate | | |
| Change in accounting estimate effected by a change in accounting principle (policy) | Do not use the phrase “change in accounting estimate effected by a change in accounting principle,” but such situations are recognized, and there is guidance on them. | There is guidance on and a definition for the phrase. Like other changes in accounting principles, any change must be to a preferable principle. |

(Table continued)

| Topic | IFRS Standards (IAS 8, IAS 34) | U.S. GAAP (ASC 250, ASC 270) |
|---|--|--|
| Error Corrections | | |
| Impracticability of retrospective restatement | Require retrospective restatement for corrections of errors unless it is impracticable. | Require retrospective restatement for corrections of errors; do not permit impracticability exemptions. |
| Balance sheet presentation when there is a retrospective change | An entity must present the beginning balance sheet of the preceding period. | Do not require an entity to present the beginning balance sheet of the preceding period. |
| Disclosures: level of disclosure for an error correction | Do not require an entity to disclose certain items that are required by U.S. GAAP. | Require more detailed disclosures for certain items. |
| Other Differences | | |
| Change in reporting entity | No specific guidance on how to account for a change in reporting entity or on whether it is appropriate to retrospectively adjust an entity's financial statements for a change in reporting entity. | Prior-period financial statements are retrospectively adjusted if there is a change in reporting entity. Certain disclosures regarding the change are also required. |

4.5 Earnings per Share

Although IFRS Standards and U.S. GAAP use similar methods to calculate both basic and diluted earnings per share (EPS), there are detailed application differences. The table below summarizes these differences, which are based on a comparison of authoritative literature under IFRS Standards and U.S. GAAP and do not necessarily include interpretations of such literature.

| Topic | IFRS Standards (IAS 33) | U.S. GAAP (ASC 260-10) |
|---|--|--|
| Treatment of mandatorily redeemable common shares and forward contracts that require physical settlement of a fixed number of shares for cash | <p><i>Forward contracts that require physical settlement of a fixed number of shares for cash:</i></p> <ul style="list-style-type: none"> • <i>Basic EPS</i> — An entity treats the shares as outstanding (and includes any earnings impact in the numerator). • <i>Diluted EPS</i> — An entity applies the reverse treasury stock method to the extent that the instrument is dilutive. <p><i>Mandatorily redeemable common shares (basic and diluted EPS):</i></p> <ul style="list-style-type: none"> • These shares are typically excluded from the denominator. | <p><i>Basic EPS</i> — An entity excludes the common shares (and any related earnings effect) that are to be redeemed or repurchased in calculating EPS. An entity applies the two-class method of calculating EPS.</p> <p><i>Diluted EPS</i> — No further adjustment to the numerator or the denominator is necessary.</p> |

(Table continued)

| Topic | IFRS Standards (IAS 33) | U.S. GAAP (ASC 260-10) |
|---|---|---|
| Treatment of mandatorily convertible instruments | Ordinary shares that will be issued upon conversion are considered outstanding in the calculation of basic EPS from the date the contract is entered into irrespective of whether the contract is participating. The result is similar to that from applying the two-class method, but the presentation differs. However, the EPS result differs from that calculated under U.S. GAAP when the instrument is not participating. | Do not directly address. However, if the instrument is participating, an entity should apply the two-class method (similar in result to considering the shares outstanding). If the instrument is not participating, the entity makes no adjustment to the numerator or denominator in computing basic EPS. |
| Application of the two-class method to participating securities | The two-class method applies only to participating securities that are equity instruments. Not required for participating debt instruments (e.g., participating convertible debt). | The two-class method applies to participating securities irrespective of whether they are debt or equity instruments. |
| Diluted EPS denominator difference: treasury stock method — YTD computation | The number of incremental shares is determined independently for each period presented. The number of dilutive potential ordinary shares in the YTD period is not a weighted average of the dilutive potential ordinary shares included in each interim computation. | For YTD diluted EPS, the number of incremental shares included in the denominator is determined by using a weighted average of the number of incremental shares included in each quarterly diluted EPS computation. |
| Diluted EPS denominator difference: contingently issuable shares — YTD computation | Weighting interim periods in the YTD computation is not permitted. See “treasury stock method — YTD computation” above. | For YTD computations, the number of contingent shares included in the diluted EPS denominator is determined by weighting the interim periods. |
| Diluted EPS denominator difference: contracts that may be settled in cash or shares | For contracts that may be settled in cash or ordinary shares at the issuer's option, diluted EPS must be based on a presumption that the contract will be settled in ordinary shares. The presumption of share settlement may not be overcome. For contracts that may be settled in cash or ordinary shares at the holder's option, the more dilutive of cash settlement or share settlement must be used in calculating diluted EPS. | Inclusion of the shares in diluted EPS is based on a rebuttable presumption that the contracts will be settled in shares (if more dilutive). The presumption that the contract will be settled in shares may be overcome if past experience or a stated policy provides a reasonable basis to believe that the contract will be paid partially or wholly in cash. |

4.6 Segment Reporting

As shown in the table below, under U.S. GAAP, operating segments are identified on the basis of products and services, while under IFRS Standards, operating segments are identified on the basis of the “core principle,” regardless of the form of organization used.

| Topic | IFRS Standards (IFRS 8) | U.S. GAAP (ASC 280-10) |
|-------------------|--|---|
| Segment reporting | Identify operating segments on the basis of the “core principle,” regardless of the form of organization used. | Require that entities with a matrix form of organization determine operating segments on the basis of products and services rather than on the basis of geographical components or other information. |

Chapter 5 — Broad Transactions

5.1 Business Combinations

Although IFRS Standards and U.S. GAAP are significantly converged in the subject of business combinations, differences exist in several key areas, as shown in the table below: (1) measurement of noncontrolling interest in a business combination, (2) contingent assets and liabilities, (3) transactions between entities under common control, (4) pushdown accounting, (5) operating leases, and (6) the definition of a business.

| Topic | IFRS Standards (IFRS 3, IFRS 15, IFRS 16) | U.S. GAAP (ASC 805, ASC 450, ASC 842) |
|--|---|---|
| Measurement of noncontrolling interest in a business combination | An entity must make an accounting policy election, on an acquisition-by-acquisition basis, for measurement of certain components of a noncontrolling interest either at (1) the noncontrolling interest's proportionate share of the net fair value of the acquiree's identifiable net assets (referred to as the "proportionate share method") or (2) fair value (i.e., the "full goodwill" approach), the latter of which is in a manner consistent with U.S. GAAP. | The full goodwill approach must be applied. |

(Table continued)

| Topic | IFRS Standards (IFRS 3, IFRS 15, IFRS 16) | U.S. GAAP (ASC 805, ASC 450, ASC 842) |
|---|--|---|
| Contingent assets and liabilities — recognition and initial measurement | <p>An entity recognizes a contingent liability at fair value if it (1) is a present obligation that results from a past event and (2) can be measured reliably.</p> <p>IFRS Standards do not allow the recognition of contingent assets.</p> | <p>In accordance with ASC 805, contingent assets and liabilities are recognized at fair value, if determinable, as of the measurement (acquisition) date. If fair value of a contingent liability cannot be determined, the entity will recognize a contingent liability if both the criteria in ASC 450 are met (i.e., that its occurrence is probable and the amount is reliably measurable).</p> <p>ASC 805-20-25-20 states that “an asset or a liability shall be recognized at the acquisition date if both of the following criteria are met:</p> <ol style="list-style-type: none"> a. Information available before the end of the measurement period indicates that it is probable that an asset existed or that a liability had been incurred at the acquisition date. It is implicit in this condition that it must be probable at the acquisition date that one or more future events confirming the existence of the asset or liability will occur. b. The amount of the asset or liability can be reasonably estimated.” |
| Contingent assets and liabilities — subsequent measurement | <p>An entity recognizes a contingent liability at the higher of:</p> <ul style="list-style-type: none"> • The amount calculated as the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. • The acquisition-date fair value less cumulative amortization recognized in accordance with IFRS 15 (if appropriate). | <p>Provide no specific guidance regarding subsequent measurement. ASC 805-20-35-3 states that “[a]n acquirer shall develop a systematic and rational basis” for subsequently accounting for preacquisition contingencies recognized as of the acquisition date. This guidance generally follows a method similar to the subsequent measurement approach in ASC 460.</p> |
| Business combinations between entities under common control | <p>Provide no guidance on the accounting treatment of transactions involving entities under common control. In practice, management can elect to apply either the acquisition method at fair value or the predecessor’s cost.</p> | <p>Generally record at the historical carrying amount (i.e., the transferor’s carrying amount).</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 3, IFRS 15, IFRS 16) | U.S. GAAP (ASC 805, ASC 450, ASC 842) |
|---|--|---|
| Pushdown accounting | Provide no authoritative guidance on whether acquired entities can apply pushdown accounting in their separate financial statements. In practice, IFRS preparers around the world do not apply pushdown accounting to separate financial statements. | Acquired entities have the option to apply pushdown accounting in their separate financial statements, as well as the financial statements for any direct or indirect subsidiaries, upon a change-in-control event. |
| Operating lease in a business combination | If the acquiree is a lessor, favorable or unfavorable terms of the operating lease, relative to current market terms or prices, are embedded in the fair value measurement of the leased asset. No separate intangible asset or liability is recognized. | If the acquiree is a lessor, an intangible asset or liability is recognized separately from the leased asset if the terms of the lease are favorable or unfavorable, respectively, relative to current market terms or prices. |
| "Business" ¹ — definition | Do not provide a "screen" test for determining when a set is not a business. | An entity is required to determine whether substantially all of the fair value of the gross assets acquired (or disposed of) is concentrated in a single identifiable asset or group of similar identifiable assets. If that threshold is reached, the set is not a business. |

¹ In October 2018, the IASB issued *Definition of a Business — Amendments to IFRS 3*, aimed at resolving the difficulties that arise when an entity determines whether it has acquired a business or a group of assets. Under the amendments, which provide a screen similar to the one under U.S. GAAP, an entity is permitted but not required to determine whether a set is not a business. The amendments apply for business combinations for which the acquisition date is on or after the beginning of the first annual reporting period on or after January 1, 2020, with earlier application permitted.

5.2 Consolidation

Though both the IASB and the FASB use control as the foundation for their approaches to consolidation, the boards' standards are not converged. A notable difference is that under U.S. GAAP, entities determine consolidation by using a two-model approach (the variable interest entity (VIE) model or the voting interest entity model), while under IFRS Standards, entities apply a single, control-based model. Other key differences between IFRS Standards and U.S. GAAP, as shown in the table below, exist in (1) the definition of "control" and the identification of the primary beneficiary, (2) potential voting rights, (3) variable interests held by related parties, (4) de facto control, (5) reporting periods, and (6) accounting policies.

| Topic | IFRS Standards (IFRS 10, IFRS 12, IFRS 3) | U.S. GAAP (ASC 810-10) |
|---|---|---|
| Consolidation models | <p>There is a single consolidation model that applies to all entities. Therefore, the concept of a VIE does not exist under IFRS 10.</p> <p>Though the VIE concept does not exist, the consolidation model and determination of who has a controlling financial interest in an entity under IFRS 10 are similar to those under ASC 810-10. Usually, the consolidation analysis under each framework will result in the same consolidation conclusion.</p> | <p>There are two models for determining when consolidation is appropriate. If a reporting entity has an interest in a VIE, it must apply the VIE consolidation model, which is based on power and economics, under ASC 810-10. If a reporting entity has an interest in an entity that is not a VIE, it must apply the voting control-based consolidation model (the voting interest entity model) under ASC 810-10.</p> |
| Definition of "control" and identification of the primary beneficiary | <p>Consolidation is based solely on the concept of control of an investee by an investor. Paragraph 7 of IFRS 10 identifies three elements of such control:</p> <ul style="list-style-type: none"> • "[P]ower over the investee." • "[E]xposure, or rights, to variable returns from involvement with the investee." • "[T]he ability to use its power over the investee to affect the amount of the investor's returns." <p>The investor must possess all three elements to conclude that it controls the investee. The investor must consider all facts and circumstances when assessing whether it controls the investee.</p> | <p>The basis for consolidating an entity depends on whether it is a VIE or a voting interest entity:</p> <p><i>VIE model</i> — An entity applies a qualitative assessment that is based on power and economics to determine which entity is the primary beneficiary of the legal entity and therefore must consolidate the VIE. The primary beneficiary has both (1) the power to direct the activities of the VIE that most significantly affect the VIE's economic performance and (2) the obligation to absorb losses of, or the right to receive benefits from, the VIE that could potentially be significant to the VIE.</p> <p><i>Voting interest entity model</i> — An entity generally considers voting rights. Typically, the conditions for consolidation are that (1) the entity owns a majority voting interest (i.e., more than 50 percent of the voting shares) and (2) the noncontrolling shareholders do not have substantive participating rights. ASC 810-10 further indicates that the power to control another entity may exist in other contracts or agreements outside of the shares.</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 10, IFRS 12, IFRS 3) | U.S. GAAP (ASC 810-10) |
|---|---|---|
| Specific limited partnership (or similar entity) guidance | The concept does not exist. | A limited partnership would be considered a VIE regardless of whether it otherwise qualifies as a voting interest entity unless a simple majority or lower threshold of the “unrelated” limited partners have substantive kick-out rights (including liquidation rights) or participating rights. For entities other than limited partnerships, a two-step process must be used to evaluate whether the equity holders (as a group) have power. |
| Potential voting rights | An entity considers potential voting rights such as those in convertible instruments or options. | An entity generally does not consider potential voting rights in determining control. |
| Variable interests held by related parties | <p data-bbox="526 808 951 1329">IFRS 10 includes a list of related parties and de facto agents similar to those included in ASC 810-10 under U.S. GAAP. However, IFRS 10 does not assume that the related parties will act in concert. Instead, paragraph B73 of IFRS 10 states, “When assessing control, an investor shall consider the nature of its relationship with other parties and whether those other parties are acting on the investor’s behalf (ie they are ‘de facto agents’). The determination of whether other parties are acting as de facto agents requires judgement, considering not only the nature of the relationship but also how those parties interact with each other and the investor.”</p> <p data-bbox="526 1354 951 1642">The practical impact is that related parties are less likely to be consolidated by a reporting entity under IFRS 10 because the power and economics of the related party are attributed to the reporting entity only if the related party is acting as its de facto agent. Further, unlike U.S. GAAP, IFRS 10 does not require performance of the related-party tiebreaker test.</p> | <p data-bbox="987 808 1419 951">There are no prescriptive related-party rules under the voting interest entity model related to the determination of whether a reporting entity should consolidate a legal entity.</p> <p data-bbox="987 976 1419 1465">However, the VIE model includes provisions that require related parties and de facto agents to be considered throughout the consolidation analysis. Interests held by related parties may result in the consolidation of the VIE by one of the related parties involved with it, even if none of the parties individually has a controlling financial interest over the VIE. If a reporting entity concludes that it does not meet the primary-beneficiary criteria but that the related-party group (including de facto agents) does, the reporting entity may be required to determine which party is most closely associated with the VIE and therefore must consolidate it.</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 10, IFRS 12, IFRS 3) | U.S. GAAP (ASC 810-10) |
|---|---|---|
| De facto control | An investor with less than a majority of the voting rights may still have power over the investee if its voting rights give it “the practical ability to direct the relevant activities unilaterally” (see paragraph B41 of IFRS 10). This circumstance may arise when the investor’s holdings of voting rights are significantly greater relative to the size and dispersion of the holdings of other investors. | The de facto control concept does not exist. |
| Differences in reporting periods | IFRS 10 requires entities to have the same reporting period unless impracticable to do so. If impracticable to do so, significant intervening transactions must be adjusted for in the consolidated financial statements, and the difference in reporting dates “shall be no more than three months.” | A difference in reporting dates of not more than three months is allowed. Disclosure of the difference and an explanation about why the difference exists are required. An entity must disclose the effect of any material intervening transactions or events during the intervening period on the financial statements of the consolidated entity. |
| Presentation requirements for certain consolidated entities | Presentation requirements for special-purpose entities are not specifically addressed. | Under the VIE model, the primary beneficiary of a VIE is required to separately present on the face of the balance sheet (1) assets of the consolidated VIE that can be used only to settle obligations of the VIE and (2) liabilities of the consolidated VIE for which creditors do not have recourse to the general credit of the primary beneficiary. |
| Differences in accounting policies | Upon consolidation, IFRS 10 requires the accounting policies of a parent and its subsidiaries to be conformed with respect to “using uniform accounting policies for like transactions and other events in similar circumstances.” | Upon consolidation, the accounting policies of a parent and its subsidiaries should be conformed in the parent’s consolidated financial statements unless differences between the policies can be justified. |

5.3 Derivatives and Hedging

IFRS Standards and U.S. GAAP contain somewhat similar requirements related to derivatives and hedging. For example, both sets of standards require derivatives to be accounted for at fair value, and both distinguish between fair value hedges and cash flow hedges. However, the definition of “derivative” is narrower under U.S. GAAP than it is under IFRS Standards, which may result in more instruments’ meeting the definition under IFRS Standards. Further, although the base premise of hedge accounting is similar under IFRS Standards and U.S. GAAP, as the table below shows, there are numerous detailed differences in the requirements entities must follow under the two sets of standards to qualify for, document, and apply hedge accounting.

| Topic | IFRS Standards (IFRS 9, IAS 32) | U.S. GAAP (ASC 815) |
|---------------------------|---|--|
| “Derivative” — definition | <p>For an instrument to meet the definition of a derivative, the following characteristics must be present:</p> <ul style="list-style-type: none"> • Its value changes in response to an underlying (e.g., specified interest rate, commodity price, foreign currency rate, credit rating, and so forth, provided in the case of a nonfinancial variable that the variable is not specific to a party to the contract). • It requires no or a small initial net investment. • It is settled at a future date. <p>Though the definition of a derivative under IFRS Standards does not include a net settlement characteristic, contracts to purchase or sell nonfinancial items are within the scope of IFRS 9 only if they can be settled net.</p> | <p>For an instrument to meet the definition of a derivative, the following characteristics must be present:</p> <ul style="list-style-type: none"> • It contains “[o]ne or more underlyings” and “[o]ne or more notional amounts or payment provisions or both” (ASC 815-10). • It requires no or a small initial net investment. • It requires or permits net settlement (i.e., via contractual terms or via means outside the contract), or it provides for delivery of an asset that is readily convertible to cash. |
| Derivatives — scope | <p>While both IFRS Standards and U.S. GAAP provide scope exceptions for certain contracts to purchase or sell nonfinancial items that will be purchased, sold, or used in the normal course of business, under IFRS Standards, the own-use scope exception for qualifying contracts is not elective and does not require an entity to document its designation of a contract as “own-use.”</p> | <p>The normal purchases and normal sales scope exception for qualifying contracts to purchase or sell nonfinancial items is elective and requires the designation to be documented.</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 9, IAS 32) | U.S. GAAP (ASC 815) |
|--|---|---|
| Embedded derivatives — initial recognition | While the overall criteria for bifurcation are similar to those under U.S. GAAP, the bifurcation requirements do not apply to financial assets within the scope of IFRS 9. Therefore, if a hybrid contract contains a host that is a financial asset within the scope of IFRS 9, the bifurcation requirements do not apply. | The bifurcation requirements apply to both assets and liabilities, including financial assets. In addition, the application guidance under U.S. GAAP is more detailed than that under IFRS Standards. Accordingly, an entity may not necessarily reach the same conclusion under IFRS Standards as under U.S. GAAP about whether the conditions for bifurcation are met. |
| Embedded equity components — initial recognition | Embedded equity-linked features that qualify as equity are separated from liabilities and accounted for as equity. | Embedded equity-linked features that qualify as equity are not separated from liabilities except in specified circumstances (e.g., conversion features subject to the cash conversion or beneficial conversion feature guidance in ASC 470-20). |
| Embedded equity components — initial measurement | Use the with-and-without method for initial measurement of equity components. The liability component is measured first. | Use different methods for initial measurement of equity components depending on the reason an amount is allocated to equity. |
| Contract on an entity's own equity — exercise contingencies | Exercise contingencies are not specifically addressed by IAS 32. In practice, exercise contingencies that would preclude equity classification under U.S. GAAP may not do so under IFRS Standards. | Exercise contingencies must be evaluated to determine whether they preclude equity classification. |
| Contract on an entity's own equity — settlement amount | A contract on an entity's own equity must be fixed for fixed to qualify as equity. Unlike U.S. GAAP, IFRS Standards do not provide detailed guidance on contracts with adjustment provisions (e.g., antidilution provisions). | To qualify as equity, the contract must be a fixed-for-fixed forward or option on equity shares, or the only variables that can adjust the settlement amount are inputs to a fixed-for-fixed forward or option. Although the fixed-for-fixed concept under U.S. GAAP is similar to that under IFRS Standards, the application may differ (e.g., the accounting for instruments with down-round provisions). |
| Contract on an entity's own equity — net cash settlement provisions | Preclude equity classification. Unlike U.S. GAAP, IFRS Standards do not contain detailed guidance on how to evaluate whether an entity might be required to net cash settle a contract that specifies share settlement. | Do not preclude equity classification if the entity cannot be forced to net cash settle the contract. Contain detailed guidance on how to assess whether an entity is able to settle in shares (e.g., whether the entity has sufficient authorized and unissued shares available to share settle the contract). |
| Contract on an entity's own equity — net share settlement provisions | Preclude equity classification. | Do not preclude equity classification if the entity cannot be forced to net cash settle the contract. |

(Table continued)

| Topic | IFRS Standards (IFRS 9, IAS 32) | U.S. GAAP (ASC 815) |
|--|---|---|
| Contract on an entity's own equity — settlement alternatives | Preclude equity classification (unless all settlement alternatives are consistent with equity classification). | Do not preclude equity classification if the entity cannot be forced to net cash settle the contract. |
| Hedge accounting — effectiveness assessment ² | Prohibit the use of the shortcut method, the critical-terms-match method, and the terminal value method. | In restrictive situations, U.S. GAAP permit the use of the shortcut method, the critical-terms-match method, and the terminal value method. |
| Hedge accounting — method for assessing effectiveness | Do not specify a method for assessing effectiveness. Require an entity to make ongoing qualitative or quantitative assessments (at a minimum at each reporting date). | An entity must perform initial and ongoing quantitative prospective and retrospective assessments of effectiveness (unless the shortcut method is applied at least quarterly). |
| Hedge accounting — basis adjustment | If a hedged forecasted transaction results in the recognition of a nonfinancial asset or nonfinancial liability, or if it becomes a firm commitment for which fair value hedge accounting is applied, the amounts that were included in the cash flow hedge reserve are removed and included directly in the initial cost or other carrying amount of the related asset or the liability. | Do not permit basis adjustments for the realized effective amounts associated with cash flow hedges. Instead, amounts in AOCI must be reclassified into earnings in the same period(s) in which the hedged forecasted transaction affects earnings (ASC 815-30-35-38). |
| Hedge accounting — dedesignation | An entity may perform dedesignation only when the hedging relationship (or a part of the hedging relationship) ceases to meet the qualifying criteria. | An entity may voluntarily discontinue hedge accounting at any time by removing the designation of the hedging relationship. |
| Hedge accounting — nonfinancial risk components in cash flow hedge | An entity may designate nonfinancial components as hedged items under the principle that a component may be designated as a hedged item if it is separately identifiable and reliably measurable. There is no requirement that the component be contractually specified. | An entity is prohibited from designating changes in cash flows of a component of a nonfinancial item as the hedged risk, with the exception of the risk of changes in the functional-currency-equivalent cash flows of a forecasted purchase or sale attributable to changes in the related foreign currency exchange rate. |
| Hedge accounting — ineffectiveness | An entity must recognize and measure hedge ineffectiveness (other than that arising from cumulative cash flow underhedges) in each reporting period. | An entity does not recognize hedge ineffectiveness in each reporting period. |

² IFRS Standards provide entities with an accounting policy choice between applying the hedge accounting requirements of IFRS 9 or continuing to apply the existing hedge accounting requirements in IAS 39 for all hedge accounting.

(Table continued)

| Topic | IFRS Standards (IFRS 9, IAS 32) | U.S. GAAP (ASC 815) |
|---|--|---|
| Hedge accounting — benchmark interest rates | An entity may designate components that are separately identifiable and reliably measurable. | Prescriptive about the eligible benchmark interest rates that may be designated in fair value hedges of interest rate risk. The only permissible U.S. benchmark interest rates are those for U.S. Treasuries, London Interbank Offered Rate swap rates, the Fed Funds Effective Swap Rate (Overnight Index Swap Rate), and the Securities Industry and Financial Markets Association Municipal Swap Rate. |

5.4 Fair Value Measurement

IFRS Standards and U.S. GAAP are largely converged though not identical in their requirements for measuring fair value and disclosing information about fair value measurements. For example, there are differences in their requirements for when an entity is required or permitted to measure items at fair value. The table below summarizes the key differences between IFRS Standards and U.S. GAAP regarding fair value measurement.

| Topic | IFRS Standards (IFRS 13) | U.S. GAAP (ASC 820-10) |
|--|---|---|
| Inception gains and losses | An entity cannot recognize inception gains or losses for a financial instrument unless the instrument's fair value is demonstrated by a quoted price in an active market for an identical asset or liability or based on a valuation technique in which an entity uses only observable market data. | If an asset or a liability is measured initially at fair value, any difference between the transaction price and fair value is recognized immediately as a gain or loss in earnings unless otherwise specified. |
| NAV practical expedient | The NAV practical expedient for investments in investment companies is not provided. | An entity with an investment in an investment company may elect to use, as a measure of fair value in specific circumstances, the reported NAV without adjustment. |
| Financial liabilities with demand features | The fair value measurement of a financial liability with a demand feature (e.g., a demand deposit) cannot be less than the present value of the amount payable on demand. | The fair value measurement of a deposit liability is described as the amount payable on demand as of the reporting date. |

5.5 Fair Value Option

Under both IFRS Standards and U.S. GAAP, an entity may elect the FVO for certain financial assets and financial liabilities under specific circumstances. However, because the scope of ASC 825 differs from that of IFRS 9 in certain respects, election of the FVO is not always permitted for the same items. The table below summarizes the key differences between the FVO under IFRS Standards and that under U.S. GAAP.

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 825-10) |
|---|---|---|
| Scope and qualifying criteria | <p>An entity may elect the FVO for a financial asset or a financial liability only if certain qualifying criteria are met:</p> <ul style="list-style-type: none"> Such an election eliminates or significantly reduces an “accounting mismatch” (i.e., an inconsistency in measurement or recognition). A group of financial liabilities or a group of financial assets and financial liabilities is managed and its performance evaluated on a fair value basis. The contract is not a financial asset and contains an embedded feature that meets certain criteria. <p>Further, the FVO may be elected for a financial instrument that represents a credit exposure if the entity uses a credit derivative measured at FVTPL to manage its credit risk and certain criteria are met.</p> | <p>An entity may elect the FVO for most financial assets and financial liabilities; its ability to elect the FVO for eligible financial instruments is generally not limited.</p> |
| Election dates | <p>An entity may elect the FVO at initial recognition of a financial instrument. For financial instruments that represent credit exposures, election may be made after initial recognition or while the instrument is unrecognized.</p> | <p>An entity may elect the FVO at initial recognition of a financial instrument or upon the occurrence of certain specified events, such as when a previously recognized financial instrument becomes subject to the equity method of accounting.</p> |
| Presentation of fair value changes of financial liabilities | <p>For a financial liability for which the FVO has been elected, an entity defers fair value changes associated with credit risk through OCI unless doing so would create or increase an accounting mismatch.</p> <p>The balance in AOCI is not released into earnings upon derecognition of the financial liability.</p> | <p>For a financial liability for which the FVO has been elected, an entity defers fair value changes associated with credit risk through OCI.</p> <p>The balance in AOCI is released into earnings upon derecognition of the financial liability.</p> |

5.6 Foreign Currency Matters

The primary sources of guidance on accounting for foreign currency transactions and translations are IAS 21 and IAS 29 under IFRS Standards and ASC 830 under U.S. GAAP. Throughout this section, terminology applicable to both IFRS Standards and U.S. GAAP is used, depending on the applicable guidance (e.g., “foreign entity” in U.S. GAAP versus “foreign operation” in IFRS Standards).

| Topic | IFRS Standards (IAS 21, IAS 29) | U.S. GAAP (ASC 830) |
|---|--|---|
| Determination of the functional currency | <p>There is a hierarchy of factors for an entity to consider in determining the functional currency.</p> <p>Paragraph 9 of IAS 21 states that the two primary factors to consider are (1) the currency that mainly influences the entity's pricing of goods and services and (2) the currency that mainly influences the costs of providing goods or services. Paragraphs 10 and 11 of IAS 21 specify the secondary factors.</p> | <p>There is no hierarchy of factors for an entity to consider in determining the functional currency.</p> |
| Translations when there is a change in functional currency | <p>The effect of a change in functional currency that is unrelated to a hyperinflationary economy is accounted for prospectively from the date of the change.</p> <p>A change in functional currency should be recognized as of the date it is determined that there has been a change in the underlying events and circumstances relevant to the reporting entity that justifies a change in the functional currency. For convenience, and as a practical matter, there is a practice of using a date at the beginning of the most recent period.</p> | <p>The effect of a change in functional currency that is unrelated to a highly inflationary economy depends on whether the change is from the reporting currency to a foreign currency or vice versa. A change from the reporting currency to a foreign currency is accounted for prospectively from the date of the change. By contrast, a change from a foreign currency to the reporting currency is accounted for on the basis of the translated amounts at the end of the previous period.</p> |
| Transaction gains and losses related to AFS debt securities | Report in earnings. | Report in OCI. |
| Recognition of deferred taxes for temporary differences related to nonmonetary assets and liabilities from changes in the exchange rate | Deferred tax is recognized for temporary differences caused by changes in the exchange rate for nonmonetary assets and liabilities when the local currency amount is remeasured to the functional currency. | No deferred tax is recognized for temporary differences caused by changes in the exchange rate for nonmonetary assets and liabilities when the local currency amount is remeasured to the functional currency. |

(Table continued)

| Topic | IFRS Standards (IAS 21, IAS 29) | U.S. GAAP (ASC 830) |
|--|---|---|
| Parent and investee with different fiscal-year-end dates — differences in exchange rates | Under IFRS 10 and IAS 28, a reporting entity is required to prepare financial statements of the subsidiary or equity method investee for the date of the reporting entity's financial statements unless it is impractical to do so. If it is impractical, the difference can be no greater than three months, and adjustments should be made for significant post-balance-sheet changes in exchange rates, up to the date of the consolidated financial statements. | An entity may elect a policy of either disclosing, or both disclosing and recognizing, material intervening events. |
| Identifying what qualifies as a partial disposal that may result in a reclassification or reattribution of the cumulative translation adjustment (CTA) | Do not distinguish between partial disposals of investments <i>in</i> and those <i>within</i> a foreign operation. Accordingly, an entity can elect either the proportionate or absolute reduction approach as an accounting policy and, if applicable, can choose how the absolute reduction approach is applied. | Only changes in a parent's ownership interest (equity investments <i>in</i> a foreign entity) may be treated as partial disposals that result in a reclassification or reattribution of CTA. Accordingly, the sale or liquidation of the net assets within a foreign entity would not result in a release or reattribution of CTA (unless it results in a complete or substantially complete liquidation of the foreign entity). |
| Impact of CTA on the measurement of impairment losses of foreign investees held for disposal | An entity is not permitted to include related CTA in the carrying amount of an investment in a foreign operation that is being evaluated for impairment. See paragraphs BC37 and BC38 of IFRS 5, which further address this issue. | In certain circumstances, an entity is required to include related CTA in the carrying amount of an investment in a foreign entity that is being evaluated for impairment. |
| Adjusting financial statements of an entity that operates in a hyperinflationary economy | An entity adjusts the financial statements by using a general price level index before translating. | An entity adjusts the financial statements as if the reporting currency of the parent were the entity's functional currency. |

5.7 Leases

The IASB and FASB recently issued standards addressing the accounting for leases (IFRS 16 and ASC 842, respectively). The prior leasing standards (IAS 17 and ASC 840, respectively) were in practice significantly converged. The boards' primary goal in developing the new standards was to require lessees to recognize liabilities on the balance sheet for all (or almost all) lease contracts. Although the boards accomplished this goal, they did so in different ways. Thus, while the boards remained largely converged with respect to scope and initial measurement, they significantly diverged on subsequent measurement for lessees, with the FASB maintaining a two-class system (operating and financing lease classifications) and the IASB requiring a single measurement model (akin to that for finance leases under U.S. GAAP).

In addition, while certain of the presentation and disclosure requirements in ASC 842 are similar to those in IFRS 16, there are also certain differences (quantitative and qualitative) in this area. Other differences between IFRS 16 and ASC 842 may also arise as a result of differences between IFRS Standards and U.S. GAAP in other standards, including those related to (1) impairment of financial instruments and long-lived assets other than goodwill and (2) the accounting for investment properties. The following table summarizes these differences:

| Topic | IFRS Standards (IFRS 16) | U.S. GAAP (ASC 842) |
|---|---|---|
| "Short-term lease" — definition (expedient to recognize similar services) | Define a short-term lease as a lease that has a lease term of 12 months or less and does not include a purchase option (i.e., the likelihood that the purchase option will be exercised is not considered). | Define a short-term lease as a lease that has a lease term of 12 months or less and does not include a purchase option that the lessee is reasonably certain to exercise. |
| Leases of low-value assets | A lessee may elect to recognize the payments for a lease of a low-value asset on a straight-line basis over the lease term. These leases would not be reflected on the lessee's balance sheet. IFRS 16 does not define "low value"; however, the Basis for Conclusions refers to assets individually with a value, when new, of \$5,000 or less. In addition, an entity will be able to adopt a reasonable capitalization policy based on materiality. | No exemption. However, the FASB believes that an entity will be able to adopt a reasonable capitalization policy based on materiality. |

(Table continued)

| Topic | IFRS Standards (IFRS 16) | U.S. GAAP (ASC 842) |
|--|--|--|
| Lease classification | <p><i>Lessee</i> — There is only a single accounting model for leases (i.e., all leases are effectively equivalent to finance leases under ASC 842), so classification of leases is unnecessary.</p> <p><i>Lessor</i> — A lessor must perform a lease classification assessment as of the inception date. A lease is classified as a finance lease if it transfers substantially all of the risks and rewards related to ownership; otherwise, it is classified as an operating lease. This determination is not based solely on meeting any one criterion.</p> | <p><i>Lessee</i> — There are two accounting models for leases (operating and finance leases), and the model will dictate the pattern of expense recognition associated with the lease. Therefore, a lessee must perform a lease classification assessment at the commencement date. A lessee must classify a lease as a finance lease if any of five criteria are met; otherwise, the lease is an operating lease.</p> <p><i>Lessor</i> — A lessor must perform a lease classification assessment as of the commencement date. The criteria governing how a lessor must classify a lease are the same as those that govern when a lessee must classify a lease as a finance lease. If any of the criteria are met on the basis of the lease terms, the lease is a sales-type lease. If a criterion is met because of a third-party residual value guarantee, the lease is a direct finance lease. If none of the criteria are met, the lessor would classify the lease as an operating lease.</p> |
| Lessee's subsequent accounting for ROU asset and lease expense | <p>A single accounting model. The ROU asset is generally amortized on a straight-line basis. This amortization, when combined with the interest on the lease liability, results in a front-loaded expense profile. That is, the single lessee accounting model under IFRS 16 is similar to that of a finance lease under ASC 842. Interest expense on the lease liability and amortization of the ROU asset are presented separately in the income statement.</p> | <p>The accounting depends on the lease classification:</p> <ul style="list-style-type: none"> • <i>Finance leases</i> — The ROU asset is generally amortized on a straight-line basis. This amortization, when combined with the interest on the lease liability, results in a front-loaded expense profile. Interest and amortization are presented separately in the income statement. • <i>Operating leases</i> — Lease expense generally results in a straight-line expense profile that is presented as a single line in the income statement. As interest on the lease liability is generally declining over the lease term, amortization of the ROU asset is increasing over the lease term to provide a constant expense profile. |

(Table continued)

| Topic | IFRS Standards (IFRS 16) | U.S. GAAP (ASC 842) |
|---|--|---|
| Recognition of variable lease payments that do not depend on an index or rate | A lessee should recognize variable lease payments not included in its lease liability (e.g., payments based on the achievement of a performance target) in the period in which the target is achieved. | A lessee should recognize variable lease payments not included in its lease liability (e.g., payments based on the achievement of a performance target) in the period in which achievement of the target that triggers the variable lease payments becomes probable. |
| Reassessment of variable lease payments that depend on an index or rate | A lessee reassesses variable payments based on an index or rate whenever there is a change in contractual cash flows (e.g., the lease payments are adjusted for a change in the consumer price index) or when the lease obligation is remeasured for other reasons. | A lessee reassesses variable payments based on an index or rate only when the lease obligation is remeasured for other reasons (e.g., a change in lease term or modification). |
| Lessee's incremental borrowing rate | The lessee's incremental borrowing rate is the rate a lessee would pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset with a value similar to the ROU asset in a similar economic environment. | The lessee's incremental borrowing rate is the rate a lessee would pay to borrow, on a collateralized basis over a similar term, an amount equal to the lease payments in a similar economic environment. |
| Modifications of operating leases for lessors | A lessor should account for a modification to an operating lease (not accounted for as a separate contract) as a new lease from the date of the modification. | If an operating lease is modified and not accounted for as a separate contract, the treatment depends on the classification of the modified lease. |
| Modifications of sales-type or direct financing leases for lessors | A lessor's accounting for a modification to a finance lease (not accounted for as a separate contract) depends on whether the lease would have been classified as an operating lease had the modification been in effect at lease inception. | A lessor's accounting for a modification to a sales-type or direct financing lease depends on the original and modified lease classification. |
| Sublease | The intermediate lessor would classify a sublease by considering the ROU asset of the head lease as the leased asset in the sublease. | The intermediate lessor would classify a sublease by considering the underlying asset of the head lease (instead of the ROU asset) as the leased asset in the sublease. |
| Sale-and-leaseback arrangements | <p>The transaction would not be considered a sale if it does not qualify as a sale under IFRS 15.</p> <p>A repurchase option would always result in a failed sale.</p> <p>For transactions that qualify as a sale, the gain would be limited to the amount related to the residual portion of the asset sold. The amount of the gain related to the underlying asset leased back to the lessee would be offset against the lessee's ROU asset.</p> | <p>The transaction would not be considered a sale if (1) it does not qualify as a sale under ASC 606 or (2) the leaseback is a finance lease.</p> <p>A repurchase option would result in a failed sale unless (1) the exercise price of the option is at fair value and (2) alternative assets are readily available in the marketplace.</p> <p>If the transaction qualifies as a sale, the entire gain on the transaction would be recognized.</p> |

5.8 Derecognition of Financial Assets

IFRS Standards and U.S. GAAP have different models for the determination of whether a transferred financial asset qualifies for derecognition. Under U.S. GAAP, an entity applies a control-based model and derecognizes assets when control is surrendered. Under IFRS Standards, an entity applies a multistep derecognition model that (1) always considers the risks and rewards of ownership and (2) may include an assessment of control over a transferred financial asset. The table below illustrates the differences between IFRS Standards and U.S. GAAP regarding the derecognition of financial assets.

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 860) |
|--|---|--|
| Control versus risks and rewards of ownership | An entity applies a multistep derecognition model that (1) always considers the risks and rewards of ownership and (2) may include an assessment of control over a transferred financial asset. | An entity applies a control-based model to determine derecognition and derecognize assets when control is surrendered. |
| “Control” — definition | Control of a financial asset is surrendered if the transferee has the unilateral ability to sell that transferred asset. However, control is not the sole determining factor in the assessment of derecognition. | Control of a financial asset is surrendered only if (1) the transferred asset is legally isolated from the transferor; (2) the transferee has the ability to freely pledge or exchange the transferred financial asset (or third-party beneficial interest holders have the right to pledge or exchange the beneficial interests if the transferee’s sole purpose is to engage in securitization or asset-backed financing activities); and (3) neither the transferor nor its consolidated affiliates or agents maintain effective control over the transferred asset through other rights. |
| Transfers of a portion of a financial asset | For a specified portion of a financial asset to be assessed for derecognition, certain conditions must be met. If they are not met, the entire asset must be assessed for derecognition. | Derecognition of a portion of a financial asset is allowed if the portion of the financial asset meets the definition of a participating interest and certain conditions are met. |
| Repurchase agreements | Do not provide conditions for derecognition that are specific to repurchase agreements. | Provide restrictive conditions an entity must consider when determining whether continued recognition of a transferred financial asset subject to a repurchase agreement is appropriate. |
| Recognition and measurement of a secured borrowing | If an entity retains substantially all the risks and rewards of ownership of a financial asset, a secured borrowing equal to the consideration received is initially recognized. If an entity has neither retained nor transferred substantially all risks and rewards but has retained control over the financial asset, the secured borrowing is initially recognized only to the extent of the entity’s continuing involvement in the transferred asset. | A secured borrowing equal to the consideration received must be recognized if a transfer of financial assets fails to qualify for derecognition. |

(Table continued)

| Topic | IFRS Standards (IFRS 9) | U.S. GAAP (ASC 860) |
|---|--|---|
| Recognition and measurement of a servicing asset or liability | <p>A servicing asset retained as part of a transfer of financial assets is considered a retained interest in those transferred assets. Therefore, the servicing asset is initially recognized at its allocated previous carrying amount on the basis of its relative fair value as of the transfer date.</p> <p>No special guidance is provided on the subsequent measurement of a servicing right. Servicing assets are considered to be intangible, and servicing liabilities are considered to be provisions.</p> | <p>A servicing asset must be initially recognized at fair value.</p> <p>An entity has the option to subsequently measure a servicing asset or liability at either fair value or amortized cost.</p> |

5.9 Other Considerations

Various other differences exist between IFRS Standards and U.S. GAAP on topics such as government grants, subsequent events, and interim financial reporting. We have summarized some of these key differences in the table below.

| Topic | IFRS Standards (IFRS 1, IAS 20, IAS 10, IAS 1, IAS 34) | U.S. GAAP (ASC 855, ASC 470, ASC 270) |
|---|---|---|
| First-time adoption of IFRS Standards | <p>Provide the procedures that an entity must follow when it adopts IFRS Standards for the first time as the basis for preparing its general purpose financial statements. The standards impose a number of mandatory exceptions and grant a number of optional exemptions from the general requirement to comply with each IFRS Standard effective at the end of the entity's first IFRS Standards reporting period.</p> | <p>Provide no such procedures.</p> |
| Interim financial reporting — cost allocation | <p>A cost that does not meet the definition of an asset at the end of an interim period is not deferred in the statement of financial position, either to await future information about whether it has met the definition of an asset or to smooth earnings over interim periods within a financial year.</p> | <p>If a specific cost or expense item charged to expense for annual reporting purposes benefits more than one interim period, the cost or expense item may be allocated to those interim periods.</p> |

(Table continued)

| Topic | IFRS Standards (IFRS 1, IAS 20, IAS 10, IAS 1, IAS 34) | U.S. GAAP (ASC 855, ASC 470, ASC 270) |
|-------------------------------------|--|--|
| Government grants | <p>Provide guidance on the recognition and measurement of government grants (including below-market government loans), along with disclosure requirements for government grants and other forms of government assistance.</p> <p>Generally, grants are recognized when there is reasonable assurance that the related conditions will be met and the grants will be received, with related profit or loss recorded on a systematic basis depending on the type of grant.</p> | <p>Contain no explicit guidance related to government grants or other forms of government assistance other than industry guidance for not-for-profit entities. Some companies follow the same approach as outlined in IFRS Standards by analogy, but there is diversity in practice.³</p> |
| Subsequent events — evaluation date | <p>Require evaluation of subsequent events through the date the financial statements are authorized for issuance.</p> | <p>Require evaluation of subsequent events through the date the financial statements are issued or available to be issued.</p> |

³ Note that in November 2015, the FASB issued a [proposed ASU](#) that would require for-profit entities to disclose information about material government assistance agreements. As of the date of this publication, a final ASU has not yet been issued.

Appendix A — Significant Adoption Dates

The charts below describe significant adoption dates for IFRS Standards and U.S. GAAP.

| IFRS Standards | Effective Date | Early Adoption Allowed (Yes/No) | Deloitte Resources |
|---|---|--|---|
| Final Guidance | | | |
| <i>Definition of a Business — Amendments to IFRS 3</i> (issued October 22, 2018) | Annual reporting periods beginning on or after January 1, 2020. | Yes | October 24, 2018, IFRS in Focus |
| <i>Amendments to References to the Conceptual Framework in IFRS Standards</i> (issued March 29, 2018) | Annual reporting periods beginning on or after January 1, 2020. | Yes | May 14, 2018, IFRS in Focus |
| IFRS 17, <i>Insurance Contracts</i> (issued May 18, 2017) | Annual reporting periods beginning on or after January 1, 2021. | Yes, for entities that apply IFRS 9 and IFRS 15. | May 18, 2017, IFRS in Focus |

| U.S. GAAP | Effective Date for PBEs | Effective Date for Non-PBEs | Early Adoption Allowed (Yes/No) | Deloitte Resources |
|--|--|--|---|---|
| Final Guidance | | | | |
| ASU 2018-19, <i>Codification Improvements to Topic 326, Financial Instruments — Credit Losses</i> (issued November 15, 2018) | See effective date information for ASU 2016-13 below. | See effective date information for ASU 2016-13 below. | Yes, as of fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. | June 17, 2016, Heads Up |
| ASU 2018-18, <i>Clarifying the Interaction Between Topic 808 and Topic 606</i> (issued November 5, 2018) | Fiscal years beginning after December 15, 2019, and interim periods within those fiscal years. | Fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021. | Yes | November 13, 2018, Heads Up |
| ASU 2018-17, <i>Targeted Improvements to Related Party Guidance for Variable Interest Entities</i> (issued October 31, 2018) | Fiscal years beginning after December 15, 2019, and interim periods within those fiscal years. | Fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021. | Yes | November 19, 2018, Heads Up |

| | | | | |
|--|--|--|--|--|
| ASU 2018-15, <i>Customer's Accounting for Implementation Costs Incurred in a Cloud Computing Arrangement That Is a Service Contract</i> (issued August 29, 2018) | Fiscal years beginning after December 15, 2019, and interim periods within those fiscal years. | Fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021. | Yes | September 11, 2018, Heads Up |
| ASU 2018-14, <i>Disclosure Framework — Changes to the Disclosure Requirements for Defined Benefit Plans</i> (issued August 28, 2018) | Fiscal years ending after December 15, 2020. | Fiscal years ending after December 15, 2021. | Yes | August 29, 2018, Heads Up |
| ASU 2018-13, <i>Disclosure Framework — Changes to the Disclosure Requirements for Fair Value Measurement</i> (issued August 28, 2018) | Fiscal years, and interim periods within those fiscal years, beginning after December 15, 2019. | Fiscal years, and interim periods within those fiscal years, beginning after December 15, 2019. | Yes | August 31, 2018, Heads Up |
| ASU 2018-12, <i>Targeted Improvements to the Accounting for Long-Duration Contracts</i> (issued August 15, 2018) | Fiscal years, and interim periods within those fiscal years, beginning after December 15, 2020. | Fiscal years beginning after December 15, 2021, and interim periods within fiscal years beginning after December 15, 2022. | Yes | August 21, 2018, Insurance Spotlight |
| ASU 2017-04, <i>Simplifying the Test for Goodwill Impairment</i> (issued January 26, 2017) | For PBEs that are SEC filers, the amendments in the ASU are effective for annual and interim goodwill impairment tests in fiscal years beginning after December 15, 2019. For PBEs that are not SEC filers, the ASU's amendments are effective for annual and interim goodwill impairment tests in fiscal years beginning after December 15, 2020. | Annual and interim goodwill impairment tests in fiscal years beginning after December 15, 2021. | Yes, for interim or annual goodwill impairment tests performed on testing dates after January 1, 2017. | February 1, 2017, Heads Up |

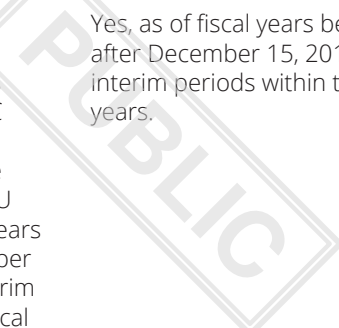
ASU 2016-13, *Measurement of Credit Losses on Financial Instruments* (issued June 16, 2016) (effective date amended by ASU 2018-19, which was issued on November 15, 2018)

For PBEs that are SEC filers, the amendments in the ASU are effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years. For all other PBEs, the amendments in the ASU are effective for fiscal years beginning after December 15, 2020, including interim periods within those fiscal years.

For all other entities, including NFPs and employee benefit plans within the scope of ASC 960 through ASC 965 on plan accounting, the amendments in the ASU are effective for fiscal years beginning after December 15, 2021, including interim periods within those fiscal years.

Yes, as of fiscal years beginning after December 15, 2018, including interim periods within those fiscal years.

June 17, 2016, [Heads Up](#)



Appendix B — Titles of Standards and Other Literature

The standards and literature below were cited or linked to in this publication.

FASB Accounting Standards Codification (ASC) Topics

ASC 205, *Presentation of Financial Statements*

ASC 220, *Income Statement — Reporting Comprehensive Income*

ASC 230, *Statement of Cash Flows*

ASC 250, *Accounting Changes and Error Corrections*

ASC 260, *Earnings per Share*

ASC 270, *Interim Reporting*

ASC 310, *Receivables*

ASC 320, *Investments — Debt and Equity Securities*

ASC 321, *Investments — Equity Securities*

ASC 323, *Investments — Equity Method and Joint Ventures*

ASC 330, *Inventory*

ASC 350, *Intangibles — Goodwill and Other*

ASC 360, *Property, Plant, and Equipment*

ASC 410, *Asset Retirement and Environmental Obligations*

ASC 420, *Exit or Disposal Cost Obligations*

ASC 450, *Contingencies*

ASC 470, *Debt*

ASC 480, *Distinguishing Liabilities From Equity*

ASC 505, *Equity*

ASC 606, *Revenue From Contracts With Customers*

ASC 710, *Compensation — General*

ASC 712, *Compensation — Nonretirement Postemployment Benefits*

ASC 715, *Compensation — Retirement Benefits*

ASC 718, *Compensation — Stock Compensation*

ASC 740, *Income Taxes*

ASC 805, *Business Combinations*

ASC 808, *Collaborative Arrangements*

ASC 810, *Consolidation*

ASC 820, *Fair Value Measurement*

ASC 825, *Financial Instruments*

ASC 830, *Foreign Currency Matters*

ASC 835, *Interest*

ASC 840, *Leases*

ASC 842, *Leases*

ASC 855, *Subsequent Events*

ASC 860, *Transfers and Servicing*

ASC 985, *Software*



FASB Accounting Standards Updates (ASUs)

ASU 2016-02, *Leases (Topic 842)*

ASU 2016-09, *Compensation — Stock Compensation (Topic 718): Improvements to Employee Share-Based Payment Accounting*

ASU 2016-13, *Measurement of Credit Losses on Financial Instruments*

ASU 2017-04, *Intangibles — Goodwill and Other (Topic 350): Simplifying the Test for Goodwill Impairment*

ASU 2018-02, *Income Statement — Reporting Comprehensive Income (Topic 220): Reclassification of Certain Tax Effects From Accumulated Other Comprehensive Income*

ASU 2018-07, *Compensation — Stock Compensation (Topic 718): Improvements to Nonemployee Share-Based Payment Accounting*

ASU 2018-12, *Financial Services — Insurance (Topic 944): Targeted Improvements to the Accounting for Long-Duration Contracts*

ASU 2018-13, *Disclosure Framework — Changes to the Disclosure Requirements for Fair Value Measurement*

ASU 2018-14, *Disclosure Framework — Changes to the Disclosure Requirements for Defined Benefit Plans*

ASU 2018-15, *Intangibles — Goodwill and Other — Internal-Use Software (Subtopic 350-40): Customer's Accounting for Implementation Costs Incurred in a Cloud Computing Arrangement That Is a Service Contract (a consensus of the FASB Emerging Issues Task Force)*

ASU 2018-17, *Consolidation (Topic 810): Targeted Improvements to Related Party Guidance for Variable Interest Entities*

ASU 2018-18, *Collaborative Arrangements (Topic 808): Clarifying the Interaction Between Topic 808 and Topic 606*

ASU 2018-19, *Codification Improvements to Topic 326, Financial Instruments — Credit Losses*

FASB Proposed Accounting Standards Update

Proposed ASU 2015-340, *Government Assistance (Topic 832): Disclosures by Business Entities About Government Assistance*

International Standards

IFRS 1, *First-Time Adoption of International Financial Reporting Standards*

IFRS 2, *Share-Based Payment*

IFRS 3, *Business Combinations*

IFRS 5, *Non-Current Assets Held for Sale and Discontinued Operations*

IFRS 8, *Operating Segments*

IFRS 9, *Financial Instruments*

IFRS 10, *Consolidated Financial Statements*

IFRS 11, *Joint Arrangements*

IFRS 12, *Disclosure of Interests in Other Entities*

IFRS 13, *Fair Value Measurement*

IFRS 15, *Revenue From Contracts With Customers*

IFRS 16, *Leases*

IFRS 17, *Insurance Contracts*

IAS 1, *Presentation of Financial Statements*

IAS 2, *Inventories*

IAS 7, *Statement of Cash Flows*

IAS 8, *Accounting Policies, Changes in Accounting Estimates and Errors*

IAS 10, *Events After the Reporting Period*

IAS 12, *Income Taxes*

IAS 16, *Property, Plant and Equipment*

IAS 17, *Leases*

IAS 19, *Employee Benefits*

IAS 20, *Accounting for Government Grants and Disclosure of Government Assistance*

IAS 21, *The Effects of Changes in Foreign Exchange Rates*

IAS 23, *Borrowing Costs*

IAS 28, *Investments in Associates and Joint Ventures*

IAS 29, *Financial Reporting in Hyperinflationary Economies*

IAS 32, *Financial Instruments: Presentation*

IAS 33, *Earnings per Share*

IAS 34, *Interim Financial Reporting*

IAS 36, *Impairment of Assets*

IAS 37, *Provisions, Contingent Liabilities and Contingent Assets*

IAS 38, *Intangible Assets*

IAS 39, *Financial Instruments: Recognition and Measurement*

IAS 40, *Investment Property*

IFRIC Interpretation 14, *IAS 19 — The Limit on a Defined Benefit Asset, Minimum Funding Requirements and Their Interaction*

IFRIC Interpretation 23, *Uncertainty Over Income Tax Treatments*

PUBLIC

Appendix C — Abbreviations

| Abbreviation | Description |
|---------------|---|
| AFS | available for sale |
| AOCI | accumulated other comprehensive income |
| APIC | additional paid-in capital |
| ASC | FASB Accounting Standards Codification |
| ASU | FASB Accounting Standards Update |
| CECL | current expected credit loss |
| CGU | cash-generating unit |
| CTA | cumulative translation adjustment |
| DTA | deferred tax asset |
| DTL | deferred tax liability |
| EPS | earnings per share |
| FASB | Financial Accounting Standards Board |
| FIFO | first in, first out |
| FVO | fair value option |
| FVTNI | fair value through net income |
| FVTOCI | fair value through other comprehensive income |
| FVTPL | fair value through profit or loss |
| GAAP | generally accepted accounting principles |

| Abbreviation | Description |
|------------------|---|
| HFI | held for investment |
| HFS | held for sale |
| HTM | held to maturity |
| IAS | International Accounting Standard |
| IASB | International Accounting Standards Board |
| IFRIC | International Financial Reporting Interpretations Committee |
| IFRS | International Financial Reporting Standard |
| IP | intellectual property |
| IPR&D | in-process research and development |
| LIFO | last in, first out |
| LLC | limited liability corporation |
| NAV | net asset value |
| PP&E | property, plant, and equipment |
| ROU | right of use |
| SPPI | solely payments of principal and interest |
| VIE | variable interest entity |
| YTD | year-to-date |