

# IFRS compared to Dutch GAAP: An overview

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# Foreword

This edition of KPMG's comparison between IFRS Accounting Standards and Dutch GAAP is an updated version in view of recent developments in external reporting. This update primarily focuses on the legislation and regulations regarding external reporting applicable to financial years starting on or after 1 January 2024.

The objective of this publication is to support all of you who would like to obtain an understanding of the main differences between IFRS Accounting Standards and Dutch GAAP (including forthcoming requirements).

Many countries have adopted International Financial Reporting Standards (IFRS) or apply accounting standards which are closely aligned with IFRS for most or all domestic listed companies.

In the European Union, IFRS Accounting Standards, as adopted by the European Union (EU-IFRS), are required for EU listed companies in their consolidated financial statements. Also, the Dutch Civil Code permits listed Dutch companies to apply EU-IFRS (or, if desired, EU-IFRS recognition and measurement principles only) in their separate financial statements. Further, unlisted companies also are permitted to apply EU-IFRS. Consequently, a company's consolidated and separate financial statements may be prepared based on two different accounting frameworks. Therefore, an overview of the significant differences between IFRS Accounting Standards and Dutch GAAP is helpful to better understand resulting differences in financial performance and financial position.

Before EU-IFRS became applicable in 2005 through the IAS Regulation of the EU, there was a fast-growing convergence between Dutch GAAP and IFRS Accounting Standards, as the Dutch Accounting Standards Board (DASB) rapidly incorporated IFRS Accounting Standards and interpretations in its own guidelines. As a result, the number of differences between IFRS Accounting Standards and Dutch GAAP

declined significantly. After 2005, the DASB changed its strategy. As a result of the implementation of EU-IFRS, many DASB guidelines were no longer applicable to listed companies and the DASB focused its standard-setting activities on unlisted companies. Consequently, new IFRS Accounting Standards were no longer implemented automatically into the DASB guidelines. However, there is a reversal of this trend in recent years as the DASB is assessing the need for and possibility of more convergence between IFRS Accounting Standards and Dutch GAAP.

Legal entities under Dutch GAAP can opt to account for impairment on financial assets in accordance with the expected credit loss model under IFRS 9 *Financial Instruments*, recognition of revenue and related costs in accordance with IFRS 15 *Revenue from Contracts with Customers*, lease accounting in accordance with IFRS 16 *Leases* and pension accounting in accordance with IAS 19 *Employee Benefits*. Such options under Dutch GAAP are particularly relevant for those legal entities that are part of a group reporting under IFRS Accounting Standards, as well as for legal entities in industries in which IFRS Accounting Standards are the commonly used financial reporting standard.

## Embracing rapid change and remaining uncertainties

In the twenty-first century, a successful company is one that adapts rapidly to innovation and change. Technological advances have had an enormous impact on businesses and their customers in recent years, with the shift to cloud computing and the growing capabilities of artificial intelligence opening vast new opportunities.

At the same time, companies are coming to terms with increased global uncertainty – for example, from geopolitical events, natural disasters, climate change and inflationary pressures.

And as they assess the impacts of these issues on their business, companies continue to face the challenge of providing meaningful and relevant information on these risks and opportunities in their financial reporting, under both IFRS Accounting Standards and Dutch GAAP.

Standard-setting bodies are also responding. The International Accounting Standards Board (IASB) has added intangible assets to its research pipeline and currently works on a project on climate-related and other uncertainties. The Dutch Accounting Standards Board (DASB) is closely monitoring these international accounting developments.

Investors and regulators have been raising concerns about the clarity of financial reporting. Furthermore, artificial intelligence has the potential to fundamentally transform communication, thereby affecting confidence and trust. Maintaining stakeholders' confidence and trust is high on the agenda for all companies, with clarity of reporting playing a key role.

Against the background of these concerns, the IASB is focusing on presentation and disclosure matters. A number of amendments to the existing presentation and disclosure requirements under IFRS Accounting Standards become effective this year and new accounting standards – IFRS 18 *Presentation and Disclosure in Financial Statements* and IFRS 19 *Subsidiaries without Public Accountability: Disclosures* – have been released.

Both standard setting bodies are also responding to the need for clarity about accounting and financial reporting on emerging topics such as crypto assets and emissions and green schemes. With new possible differences between IFRS Accounting Standards and Dutch GAAP on the horizon, dual reporters need to monitor these developments closely.

## Dutch GAAP

KPMG has published its annual factsheet on [Dutch accounting standards](#), providing an overview of the most important changes applicable for financial year 2025. It does not identify changes in respect to specific industries. To provide a complete overview, the factsheet starts with a summary of the main changes to the Standards that came into effect for financial years beginning on or after 1 January 2024 (financial year 2024), which are also included in this comparison publication.

## Sustainability reporting

It should be emphasised that there is a connection between financial accounting and the reporting on Environmental, Social, and Governance (ESG) factors. Getting the connectivity right helps building trust between your management and investors. Connectivity is especially important when reporting on issues that create volatility for the company's prospects, such as climate and uncertain times. We also note that effective sustainability reporting would require the same rigor as financial statement reporting. Such an approach would result in ESG disclosures that are accurate, reliable, relevant, comparable, verifiable, understandable.

## Understanding the differences

This guide highlights the key differences between IFRS Accounting Standards and Dutch GAAP, based on 2024 calendar year ends. It does not discuss every possible difference; it is rather a summary of those areas encountered frequently where the principles differ or where there is a difference in emphasis, specific application guidance or practice.

The focus of this publication is primarily on recognition, measurement and presentation. However, it also covers areas that are disclosure based, such as segment reporting.

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# About this publication

The purpose of this publication is to assist you in understanding the significant differences between the accounting principles of International Financial Reporting Standards (IFRS) and Dutch accounting standards (Dutch GAAP).

A summary of the IFRS requirements is included in the left-hand column. In the right-hand column, Dutch GAAP is compared to IFRS, highlighting similarities and differences. This publication is a summary of the key provisions of IFRS, contrasted with the corresponding Dutch GAAP requirements.

This publication does not discuss every possible difference, but it is a summary of those differences that are encountered most frequently in practice. These result from either a difference in emphasis or specific application guidance. The focus of this publication is on recognition, measurement and presentation, rather than on disclosure. Therefore, disclosure differences are generally not discussed, although users of this publication should be aware that there is a relatively large number of disclosure requirements under IFRS which are not included in Dutch GAAP. However, standards that are disclosure based, such as segment reporting, are included.

This publication does not address the requirements included in the IFRS Accounting Standards for Small and Medium-sized enterprises (SMEs) and IAS 26 *Accounting and Reporting by Retirement Benefit Plans*; otherwise, this publication addresses the types of businesses and activities that IFRS addresses. So, for example, biological assets are included in this publication, but accounting by not-for-profit entities is not. In addition, this publication focuses on consolidated financial statements prepared on a going concern basis. Separate financial statements are generally not specifically addressed in this publication.

Lastly, the IFRS requirements are discussed on the basis that the entity has already adopted IFRS, excluding IFRS 1 *First-time Adoption of International Financial Reporting Standards* and IFRS 14 *Regulatory Deferral Accounts*. The special transitional rules that will apply during the period that an entity changes its previous GAAP to IFRS, including implications for an entity in scope of IFRS 14, are discussed in our publication 'Insights into IFRS, KPMG's practical guide to International Financial Reporting Standards' – find out more at [kpmg.com/ifrs](https://kpmg.com/ifrs).

## Effective date

Generally, the standards and interpretations included in this publication are those that are mandatory for annual reporting periods beginning on or after 1 January 2024. Unless otherwise noted, the requirements contained in these standards are 'currently effective'. A list of these standards and interpretations is included in the Appendices.

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# 1 Background

## 1.1 Application of EU-IFRS and/or Dutch Civil Code Book 2 Title 9

Title 9 offers legal entities the possibility to prepare both the separate and the consolidated financial statements in accordance with IFRS Accounting Standards as adopted by the EU (abbreviated to 'EU-IFRS'). Legal entities governed by the law of a member state and whose securities on the balance sheet date are admitted to trading on a regulated market of a member state, are required under the IAS Regulation of the EU to prepare their consolidated financial statements in accordance with EU-IFRS. Other legal entities are free to prepare their entire financial statements or only their consolidated financial statements in accordance with EU-IFRS. A legal entity can prepare its separate financial statements in accordance with EU-IFRS if its consolidated financial statements are also prepared in accordance with EU-IFRS. Preparing the separate and/or the consolidated

financial statements in accordance with Title 9 implies the application of the Annual Accounts Formats Decree and the Current Value Decree.

The possible combinations offered by the law are set out in the following table. In a document of the European Commission (November 2003) with an explanation of various matters from the IAS regulation, the European Commission took the view at the time that it first of all should always be established on the basis of national legislation (in this case Title 9) whether a legal entity is required to prepare consolidated financial statements. Subsequently, an entity determines which combination from the table can (and will be) applied.

*	Consolidated financial statements	Separate financial statements
1**	Dutch Civil Code Book 2 Title 9	Dutch Civil Code Book 2 Title 9
2	EU-IFRS	Dutch Civil Code Book 2 Title 9
3	EU-IFRS	Dutch Civil Code Book 2 Title 9, but using the option of applying the measurement policies as applied in the consolidated financial statements (Article 362 paragraph 8)***
4	EU-IFRS	EU-IFRS
5	n/a	Dutch Civil Code Book 2 Title 9
6	n/a	EU-IFRS

\* Combinations 1 to 4 are relevant if consolidated financial statements are prepared, combinations 5 and 6 if only separate financial statements are prepared.

\*\* This combination is not possible for listed legal entities.

\*\*\* Only available for legal entities that prepare consolidated financial statements themselves on the basis of EU-IFRS.

### Notes to combination 1

If the legal entity prepares consolidated financial statements in accordance with Title 9 and therefore not EU-IFRS, then the separate financial statements should also be prepared in accordance with Title 9. This combination is not possible for listed legal entities as on grounds of the IAS regulation they are required to prepare consolidated financial statements in accordance with EU-IFRS.

### Notes to combination 2

The legal entity that prepares consolidated financial statements in accordance with EU-IFRS (whether on an obligatory or voluntarily basis) can prepare separate financial statements on the basis of Title 9. In many cases this combination will lead to a difference in equity and result in the consolidated and separate financial statements as often different accounting policies are applied in both financial



statements. Furthermore, the capital maintenance rules of Articles 365, paragraph 2, 373, 389, paragraphs 8 and 10, and 390 only apply to separate financial statements as these form the basis for dividend distributions. The application of these capital maintenance rules is required under combination 2 because the separate financial statements are prepared in accordance with Title 9.

The application of EU-IFRS in the consolidated financial statements entails that the regime for large legal entities must be applied in the separate financial statements on the basis of Title 9, irrespective of the actual size of the legal entity.

#### Notes to combination 3

Article 362 paragraph 8 allows consolidated financial statements to be prepared on the basis of EU-IFRS in combination with the separate financial statements on the basis of Title 9, where the measurement policies are applied in the separate financial statements that the legal entity has applied in its consolidated financial statements. The possibility of also applying the measurement policies that are applied in the consolidated financial statements according to EU-IFRS in the separate financial statements has been created by the legislator in order to enable that the equity and the result in the separate financial statements (in principle) remain equal to the equity and the result according to the consolidated financial statements. On the basis of this, the RJ concludes that the classification policies that have an impact on the distinction between equity and liabilities, also fall under the measurement policies.

With combination 3, the separate financial statements are prepared on the basis of Title 9. The presentation and disclosure requirements of Title 9 should therefore be followed in the separate financial statements. The presentation and disclosure requirements of EU-IFRS cannot be followed in the separate financial statements if these differ from the requirements of Title 9.

The Annual Accounts Formats Decree applies to the separate financial statements. In addition, application of EU-IFRS in the consolidated financial statements means that the regime for large legal entities must be applied in the separate financial statements, irrespective of the size of the legal entity. Article 402 can be applied, except when the legal entity is an organisation of public interest, meaning that a condensed profit and loss account suffices. If EU-IFRS requires further disclosures, then there is nothing against including that information as well in the separate financial statements.

The capital maintenance rules of Article 365 paragraph 2, Article 373, Article 389 paragraphs 8 and 10, and Article 390 also apply, although only to the separate financial statements.

It is noted that combination 3 can only be applied by legal entities that prepare consolidated financial statements themselves on the basis of EU-IFRS. A legal entity that does not prepare consolidated financial statements itself, for example because it applies Article 408, cannot apply combination 3 (not even with a reference to consolidated EU-IFRS financial statements of the parent and/or an EU-IFRS consolidation set that is prepared for the benefit of the parent).

#### Notes to combination 4

With combination 4 both the consolidated and the separate financial statements are prepared on the basis of EU-IFRS policies. However, this does not necessarily mean that the equity and the result will be equal to each other in both financial statements. EU-IFRS makes it possible to measure participating interests, over which significant influence can be exercised (in the separate financial statements) at cost, at equity value method or otherwise in accordance with IFRS 9 Financial Instruments (in this case at fair value). In the consolidated financial statements those same participating interests, insofar as they are not consolidated, have to be measured based at equity value according to EU-IFRS. Therefore, depending on the chosen measurement policy in the separate financial statements, there may be measurement differences.

The legal entity that prepares the separate financial statements according to EU-IFRS, as is the case with combinations 4 and 6, only applies the following parts of Title 9:

- Article 362 paragraph 6, sentence before last: required actions when it appears that adopted financial statements are seriously defective;
- Article 362 paragraph 7, final sentence: the language of the financial statements;
- Article 362 paragraph 10: the statement according to which standards the financial statements are prepared;
- Article 365 paragraph 2: the legal reserve for capitalised development costs;
- Article 373: the presentation and disclosure of equity;
- Article 379 paragraphs 1 and 2: the list of capital interests;
- Article 380b, part d: the registration number in the trade register;
- Article 382: the average number of employees;
- Article 382a: the auditors' fees;
- Article 383 and Article 383b up to and including Article 383e: the statement of remuneration, loans, advance payments and guarantees for the benefit of Management Board members and Supervisory Board members;
- Article 389 paragraph 8: the foreign currency translation reserve;
- Article 389 paragraph 10: the disclosure of the differences between equity and result in the separate and consolidated financial statements;
- Article 390: the revaluation reserve;
- Part 7 Management report;
- Part 8 Other information;
- Part 9 Audit; and
- Part 10 Publication.

However, when applying EU-IFRS, a part of this information shall also be provided on the basis of EU-IFRS provisions.

Since the separate financial statements form the basis for dividend distributions, the capital maintenance rules of Article 365 paragraph 2, Article 373, Article 389 paragraphs

8 and 10, and Article 390 only apply to the separate financial statements.

#### Notes to combination 5

If the legal entity is not required to prepare consolidated financial statements according to Title 9, then the separate financial statements can be prepared in accordance with Title 9. This combination may also be relevant for listed legal entities as the IAS regulation (together with the obligation therein to apply EU-IFRS) only relates to the consolidated financial statements and it is possible that a listed legal entity does not need to prepare consolidated financial statements. The latter must be assessed on the basis of national legislation (in this case Title 9).

#### Notes to combination 6

If the legal entity does not need to prepare consolidated financial statements in accordance with Title 9, then the separate financial statements can be prepared in accordance with EU-IFRS. The legal entity that prepares separate financial statements in accordance with EU-IFRS, only applies the articles and parts from Title 9 that are cited in Article 362 paragraph 9.

#### Application of Article 362 paragraph 9 under combinations 2 and 3

For legal entities that prepare the consolidated financial statements in accordance with EU-IFRS and the separate financial statements in accordance with Title 9 (combination 2 or 3), the articles cited in Article 362 paragraph 9 already apply directly since the separate financial statements are prepared in accordance with Title 9. In those cases, Article 362 paragraph 9 is irrelevant.

#### Disclosure of which standards have been applied

The legal entity has to disclose in the notes according to which standards financial statements have been prepared. This provision also applies to legal entities that apply EU-IFRS. This means that the legal entity has to disclose whether the financial statements are prepared in accordance with EU-IFRS or in accordance with the legal provisions of Title 9.

#### EU-IFRS versus IFRS

For EU entities that apply IFRS Accounting Standards in their financial statements on a mandatory or voluntary basis, reference shall be made to EU-IFRS ('IFRS as adopted by the EU'). Differences might exist between IFRS and EU-IFRS, in most cases such differences will be temporary due to the time needed for the EU to endorse new and revised IFRS standards and interpretations. In the rest of this publication, the term 'IFRS' will be used for the sake of simplicity. 'IFRS' can be assumed to have the same meaning as 'EU-IFRS', unless specifically indicated otherwise.



## 1.2 Exemptions based on the size of the legal entity

Dutch law grants certain exemptions for legal entities not exceeding certain size thresholds (except for specific legal entities, such as public interest entities). For this purpose, the law recognises four categories of legal entities, namely large, medium sized, small and micro. Legal entities are classified into one of these categories based on size criteria. The classification of legal entities into one of the four categories depends on meeting two of the following three size criteria on two consecutive balance sheet dates:

- balance sheet total;
- net turnover; and
- average number of employees.

	Balans tot new (old) EUR	Net-turnover new (old) EUR	Number of employees
Micro	≤ 450.000 (350.000)	≤ 900.000 (700.000)	≤ 10
Small	≤ 7.50.000 (6.000.000)	≤ 15.000.000 (12.000.000)	≤ 50
Medium	≤ 25.000.000 (20.000.000)	≤ 50.000.000 (40.000.000)	≤ 250
Large	> 25.000.000 (20.000.000)	> 50.000.000 (40.000.000)	> 250

The increased threshold amounts apply to financial years starting on or after 1 January 2024. However, they may also be applied for financial years starting on or after 1 January 2023. Additionally, the revised threshold amounts can be used for the comparative figures to determine the applicable size regime for the first reporting year of their application. The size regime for financial statements for financial years

## 1.3 Sustainability reporting

At the end of 2022, the EU published the Corporate Sustainability Reporting Directive (CSRD). The Directive describes the main features of non-financial information to be provided in the management report. In addition, the Directive gives the European Commission the power to set standards for sustainability reporting. These standards are a further elaboration of the reporting provisions of the Directive. The drafting of these standards (European Sustainability Reporting Standards, abbreviated ESRS) is the responsibility of the European Financial Reporting Advisory Group (EFRAG). The non-financial information to be disclosed in the management report under the Directive

The size criteria thresholds in Dutch law are taken from the EU Accounting Directive. The European Commission adopted a delegated regulation in October 2023, to increase the financial threshold amounts in the EU Accounting Directive by around 25% to compensate for inflation since 2013 (the last time the size criteria thresholds were changed). In March 2024, these increased financial threshold amounts were transposed into Dutch law through the Implementation Decree Directive increasing threshold amounts.

The old and new size criteria thresholds per size category are as follows:

started before 1 January 2023, should be determined based on the previous threshold amounts.

Note that the size criteria are not applicable when preparing financial statements based on EU-IFRS. EU-IFRS reporters should always apply the size regime for large entities.

and these standards is subject to 'limited assurance', issued by an auditor or an independent assurance service provider (member state option).

During 2023 and 2024, on several occasions the EU announced plans to reduce the administrative burden for companies imposed by various reporting requirements, including sustainability reporting. According to the EU, reporting requirements should be proportionate to the goal they pursue. The European Commission (EC) proposes a 'Simplification Omnibus Package' early 2025 which, among other measures, includes a far-reaching simplification in

the fields of sustainable finance reporting, sustainability due diligence and the EU-taxonomy. The EC released this package on 26 February 2025. Further proposals, addressing a simplification of the ESRS, are expected to be released later in 2025. The proposals significantly reduce the scope of the CSRD, the ESRS and the EU Taxonomy Regulation, and also intend to reduce the disclosure requirements for companies that will be in scope. It is not yet clear what the time frame will be for the finalisation and adoption of the EC proposals, which will then still have to be followed by the transposition into national legislation before the amendments can become effective for companies.

### Implementation in Dutch law

The implementation of the current CSRD in Dutch law started in mid-2023. The implementation takes place via two parallel routes:

1. Legislative proposal for the implementation of the CSRD: this specifically addresses the requirements for auditors and audit firms that are required to audit sustainability information, and the extension of the transparency obligations for listed companies ('issuers').
2. Draft Implementation Decree on the CSRD: this specifically addresses the scope of the sustainability reporting, the effective dates and the reporting requirements for companies that fall within the scope.

The legislative proposal was sent to the Council of State in June 2024 for advice, and thereafter was sent to the House of Representatives in January 2025 for consideration and adoption. The draft decree was sent to Parliament in June 2024 as part of a so-called preliminary procedure. After assessment by the Parliament and possible adjustments, the draft decree will be sent to the Council of State for advice. The Act and Decree are expected to be finally adopted and published in 2025, although the recent Omnibus proposals (see above) may have an impact on the implementation process.

In the aforementioned draft decree, the Dutch legislator has chosen to keep the scope of application the same as that of the CSRD. This would mean that sustainability reporting would apply in the Netherlands to the legal entity forms N.V., B.V., V.O.F. and C.V. (insofar as all partners that are fully liable for the debts to creditors are capital companies under foreign law), as well as banks and insurers (regardless of their legal form).

### European Sustainability Reporting Standards (ESRS)

The standards for sustainability reporting (ESRS) require that the reported information is understandable, relevant, representative, verifiable, comparable, and presented in a fair manner. The standards specify what information companies provide about:

- environmental factors, including climate change mitigation, climate change adaptation, water and marine resources, resource use and the circular economy, pollution and biodiversity and ecosystems. These are the six environmental objectives that are also listed in the EU Taxonomy Regulation;
- social factors, including equal treatment and opportunities for all, working conditions and respect for human rights, fundamental freedoms, democratic principles and norms outlined in the International Statute of Human Rights and other significant human rights treaties;
- governance factors, including the role of the governing, executive, and supervisory bodies of the company, the key features of the company's internal control and risk management systems, corporate ethics and culture, the company's political engagement, management and quality of relationships with customers, suppliers, and communities affected by the company's activities.

By the end of 2023, the EU published a first set of 12 standards (comprising two general standards and ten topical standards covering environmental, social and governance topics) as a delegated regulation. The standards, therefore, have direct effect in the member states. The effective date of the standards is the same as the effective date of the CSRD.

### EU Taxonomy

The EU's sustainability and reporting measures also include the EU Taxonomy Regulation that contains a listing of economic activities that can be classified as environmentally sustainable ('green'). Companies within the scope of this regulation include, in their non-financial statement, information on how and to what extent their activities are related to economic activities that can be classified as environmentally sustainable.



## 1.4 Introduction

IFRS Accounting Standards	Dutch GAAP
<p>'IFRS Accounting Standards' is the term used to indicate the whole body of authoritative literature published by the IASB, including:</p> <ul style="list-style-type: none"> <li>Accounting Standards issued by the IASB;</li> <li>International Accounting Standards (IAS® Standards) issued by the IASB's predecessor, the International Accounting Standards Committee (IASC), or revisions thereof issued by the IASB;</li> <li>interpretations developed by the IFRS Interpretations Committee (IFRIC Interpretations) and approved for issue by the IASB; and</li> <li>interpretations developed by the IFRS Interpretations Committee's predecessor, the Standing Interpretations Committee (SIC® Interpretations) and approved for issue by the IASB or the IASC.</li> </ul> <p>Emerging issues related to the application of IFRS Accounting Standards are generally referred to the IFRS Interpretations Committee. If the Committee decides not to add an issue to its work programme or refer it to the IASB, then an agenda decision is published. An entity reporting under IFRS Accounting Standards applies the agenda decision relevant to its facts and circumstances. Although they do not change the requirements of the Accounting Standards, agenda decisions may provide new insights on how to interpret and apply them. An entity may have to change its accounting policy as a result of the publication of a final agenda decision and may need 'sufficient time' to implement it.</p> <p>The term 'IFRS Accounting Standards' is used in this publication to indicate any of the above material.</p> <p>IFRS Accounting Standards are designed for use by profit-oriented entities, although their use by not-for-profit organisations is not prohibited.</p> <p>Any entity claiming compliance with IFRS Accounting Standards must comply with all standards and interpretations, including disclosure requirements, and must make an explicit and unreserved statement of compliance with them.</p>	<p>'Dutch GAAP' is the term used to indicate the whole body of authoritative accounting literature, including the Dutch Civil Code (DCC) and the Guidelines on Annual Reporting, called 'Richtlijnen voor de Jaarverslaggeving' (RJ) from the Dutch Accounting Standards Board (DASB).</p> <p>Emerging issues related to the application of Dutch GAAP are generally referred to in 'RJ-Uitingen'.</p> <p>RJ-Uitingen are intended for the clarification or interpretation of existing Standards (RJ) or for amendments to them. In this way, the DASB hopes to be able to respond adequately to questions from society. The RJ-Uitingen with changes to the RJ will be incorporated in the next annual edition of the RJ and will generally no longer have any independent significance thereafter. A number of RJ-Uitingen offer a helping hand or explanation in particular.</p> <p>The term 'Dutch GAAP' is used in this publication to indicate any of the above material.</p> <p>Like IFRS Accounting Standards, the DCC is primarily designed for use by profit-oriented entities. Unlike IFRS Accounting Standards, the RJ is designed for use both by profit-oriented entities and certain not-for-profit organisations.</p> <p>Like IFRS Accounting Standards, any entity claiming compliance with Dutch GAAP must comply with all the elements thereof and has to provide an explicit statement of compliance with Dutch GAAP.</p>

IFRS Accounting Standards comprise a series of bold- and plain-type paragraphs. Generally, the bold-type paragraphs outline the main principle, and the plain-type paragraphs provide further explanation. Bold- and plain-type paragraphs have equal authority. Some IFRS Accounting Standards contain appendices; a statement at the top of each appendix specifies its status. The Basis for Conclusions that accompany accounting standards are not an integral part of those accounting standards and do not have the same level of authority.

The overriding requirement of IFRS Accounting Standards is for the financial statements to give a fair presentation (or a true and fair view).

A hierarchy of alternative sources is specified for situations in which IFRS Accounting Standards do not cover a particular issue. In developing and applying an accounting policy must use judgement that results in relevant and reliable information, and does not conflict with the Conceptual Framework.

IFRS Accounting Standards also prescribe standards for Small and Medium-sized Entities (SMEs). Compared with full IFRS Accounting Standards, the IFRS for SMEs are less complex. The IFRS for SMEs are outside the scope of this publication.

There are no special standards or exemptions for SMEs that apply to full IFRS Accounting Standards. However, EPS and segment information are not required for non-public entities.

### XBRL

eXtensible Business Reporting Language (XBRL) is a form of electronic communication whose main feature includes interactive electronic tagging of both financial and non-financial data. The IFRS Taxonomy is a translation of IFRS Accounting Standards into XBRL. It classifies information presented and disclosed in financial statements prepared under IFRS Accounting Standards and reflects presentation and disclosure requirements in IFRS Accounting Standards.

The IASB is not issuing requirements to file under the IFRS Taxonomy; the submission of financial statements prepared under IFRS Accounting Standards in XBRL (eXtensible Business Reporting Language) is mandated by regulators in their jurisdiction.

Like IFRS Accounting Standards, the DCC must be complied with, although it does not comprise bold- and plain-type paragraphs like the RJ. Unlike IFRS Accounting Standards, the bold-type paragraphs of RJ are authoritative statements, whereas the plain-type paragraphs of RJ are recommendations only. Unlike IFRS Accounting Standards, in addition, vertical lines in RJ (in the margin of the guidelines) help to identify new provisions or amended provisions.

Like IFRS Accounting Standards, the overriding requirement of Dutch GAAP is for the financial statements to give a fair presentation (true and fair view).

Unlike IFRS Accounting Standards, no hierarchy is specified for situations in which Dutch GAAP does not cover a particular issue. Like IFRS Accounting Standards, in developing and applying an accounting policy must use judgement that results in relevant and reliable information and does not conflict with the Conceptual Framework.

Like IFRS Accounting Standards, Dutch GAAP contains several exemptions for micro, small and medium-sized legal entities. These exemptions and requirements are outside the scope of this publication. Therefore, the differences between IFRS Accounting Standards and Dutch GAAP addressed in this publication are those that apply to large legal entities: meeting at least two out of three of the following criteria for two consecutive years: (1) net assets > EUR 25 million; (2) revenue > EUR 50 million; and (3) average number of employees ≥ 250.

IFRS for SME does not form a part of EU-IFRS and direct (voluntary) application of IFRS for SME by Dutch companies is not possible.

### SBR

As of the 2025 financial year, all legal entities are required to file their financial statements electronically with the trade register of the Chamber of Commerce (KVK) via Standard Business Reporting (SBR). The Electronic Filing of the Trade Register Decree was amended in December 2024 in order to achieve this. Until now, certain categories of legal entities, including large legal entities and their medium-sized subsidiaries, have been exempted from the obligation to file electronically via SBR.

Entities that issue securities admitted to trading on a regulated market in the European Union are required to file their annual reports in the European Single Electronic Format ('ESEF').



### Forthcoming requirements

IFRS 19 *Subsidiaries without Public Accountability: Disclosures* is effective for annual periods beginning on or after 1 January 2027.

Under the new standard, an eligible subsidiary is permitted to apply the requirements of IFRS Accounting Standards and the reduced disclosure requirements of IFRS 19 provided that, at the reporting date:

- it does not have public accountability; and
- it has an ultimate or intermediate parent that produces consolidated financial statements available for public use and prepared in compliance with IFRS Accounting Standards.

### References:

IFRS Foundation Constitution, IASB and IFRIC Due Process Handbooks, Preface to IFRS, IAS 1, IFRS 19

### Forthcoming requirements

There are no forthcoming related requirements under Dutch GAAP.

### References:

DCC, Annual Accounts Formats Decree, Current Value Decree, Framework, RJ 110

## 1.5 Conceptual Framework and basis of preparation of financial statements

IFRS Accounting Standards	Dutch GAAP
The Conceptual Framework is used in developing and maintaining standards and interpretations.	Like IFRS Accounting Standards, the Conceptual Framework was used as a basis for drafting new or revised RJs.
The Conceptual Framework is a point of reference for preparers of financial statements in the absence of specific guidance in IFRS.	Like IFRS Accounting Standards, the RJ Framework was a point of reference for preparers of financial statements in the absence of specific guidance.
	Mid 2024, the RJ withdrew the Conceptual Framework and moved some important parts to the general RJ standards, and included certain conceptual principles in an introductory general paragraph entitled 'Background and Principles to the Guidelines'. The adjustments do not seek substantive changes and maintain the conceptual principles of the Guidelines.
	Where the RJ permits 'full application' of IFRS Accounting Standards or US-GAAP standards, 'full application' means that, in principle, all provisions of the standards concerned (or the relevant parts thereof) are followed, except for references to provisions in other standards that are not applied by the legal entity unless this has been explicitly allowed.
IFRS Accounting Standards do not apply to items that are 'immaterial'.	Like IFRS Accounting Standards, Dutch GAAP does not apply to items that are 'immaterial'.

The Conceptual Framework provides a broad discussion of the concepts that underlie the preparation and presentation of financial statements. It discusses the:

- objective of general-purpose financial reporting;
- qualitative characteristics of useful financial information, such as relevance and faithful presentation;
- concept of the reporting entity;
- elements of financial statements;
- general guiding principles for recognition and derecognition;
- measurement bases; and
- high-level concepts for presentation and disclosure.

A 'reporting entity' is one that is required, or chooses, to prepare financial statements. It does not have to be a legal entity but can comprise a single entity, multiple entities or a portion of an entity.

In the case of multiple entities, if a reporting entity comprises two or more entities that are not linked by a parent-subsidiary relationship, then its financial statements are referred to as 'combined financial statements'. The preparation of combined financial statements is outside the scope of this publication.

Financial statements are prepared on a going concern basis, unless management intends or has no realistic alternative other than to liquidate the entity or to stop trading.

If management concludes that the entity is a going concern, but there are nonetheless material uncertainties that cast significant doubt on the entity's ability to continue as a going concern, then the entity discloses those uncertainties.

Like IFRS Accounting Standards, the DASB's conceptual principles provide a broad discussion of the concepts that underlies the preparation and presentation of financial statements. Among other topics, it discusses the following elements of the former Conceptual Framework:

- the content and meaning of the (draft) Guidelines;
- principles of the Guidelines;
- qualitative characteristics of financial statements and other general purpose reporting;
- prerequisites related to relevant and reliable information; and concepts of capital and capital maintenance.

The general Guidelines discuss the following elements of the former Conceptual Framework:

- elements of financial statements;
- general guiding principles for recognition and measurement; and
- measurement bases.

Like IFRS Accounting Standards, a 'reporting entity' is one that is required, or chooses, to prepare financial statements.

Unlike IFRS Accounting Standards, Dutch GAAP is based on the assumption that the reporting entity is always a legal entity and cannot comprise a portion of an entity or multiple combined legal entities.

The going concern assumption under Dutch GAAP is similar to the IFRS Accounting Standards.

Like IFRS Accounting Standards, Dutch GAAP requires the reporting entity to disclose material uncertainties that cast significant doubt on the entity's ability to continue as a going concern, together with an adequate explanation of the legal entity's circumstances.

Unlike IFRS Accounting Standards, the DASB has developed different scenarios and the appropriate requirements, being:

- **Scenario 1: No uncertainty about continuity.**
  - **Accounting policy:** financial statements based on the going concern assumption.
  - **Disclosure:** no specific disclosure on continuity. If there is a discontinuity, explain this fact and disclose the possible impact on equity and result. Also, explain the nature of the remaining business activities and, if applicable, mention that the legal entity has been established for a definite period of time.



If the entity is not a going concern entity and the financial statements are being prepared in accordance with IFRS Accounting Standards, then in our view there is no general dispensation from the measurement, recognition and disclosure requirements.

An asset is a present economic resource controlled by the entity as a result of past events.

An economic resource is a right or a set of rights that has the potential to produce economic benefits. The probability of economic benefits is not relevant for determining whether an asset or a liability exists; however, a low probability of economic benefits may affect the recognition and measurement analysis.

A liability is a present obligation of the entity to transfer an economic resource as a result of past events. An obligation is a duty or responsibility that an entity has no practical ability to avoid. If it is conditional on an entity's future action, then an obligation exists if the entity has no practical ability to avoid taking that action.

An 'executory contract' is one in which neither party has performed any of its obligations or both parties have partially performed their obligations to an equal extent. If the terms of the exchange under the contract are currently favourable for the entity, then it has an asset. Conversely, if the terms are currently unfavourable for the entity, then it has a liability. The asset or liability is reflected in the financial statements if it is required by a specific IFRS Accounting Standard (e.g. onerous contracts – chapter 3.10)

- **Scenario 2: Concerns about the continuity, but no material uncertainty.**
  - **Accounting policy:** financial statements based on the going concern assumption.
  - **Disclosure:** significant judgements and estimates, if necessary for the required insight.
- **Scenario 3: Material uncertainty about the continuity.**
  - **Accounting policy:** financial statements based on the going concern assumption.
  - **Disclosure:** disclose that material uncertainty about going concern exists, together with an adequate explanation of the legal entity's circumstances. Significant judgements and estimates if necessary for the required insight.
- **Scenario 4: Inevitable discontinuity.**
  - **Accounting policy:** financial statements on liquidation basis.
  - **Disclosure:** under disclosure of impact on equity and results, explain that the legal entity's entire business is not continued. Also, usual disclosure requirements of Title 9 Book 2 of the DCC and specific disclosure relating to inevitable discontinuity.

Unlike IFRS Accounting Standards, if an entity cannot meet its obligations and discontinuity becomes unavoidable, the financial statements are to be prepared on liquidation basis (which involves different recognition, measurement and disclosure requirements compared to going concern basis).

Like IFRS Accounting Standards, an asset is a resource controlled by the entity as a result of past events and from which future economic benefits are expected to flow to the entity.

Like IFRS Accounting Standards, a liability is a present obligation of the entity arising from past events, the settlement of which is expected to result in an outflow from the entity of resources embodying economic benefits.

Like IFRS Accounting Standards, an 'executory contract' is one in which neither party has performed any of its obligations or both parties have partially performed their obligations to an equal extent. If the terms of the exchange under the contract are currently favourable for the entity, then it has an asset. Conversely, if the terms are currently unfavourable for the entity, then it has a liability. The asset or liability is reflected in the financial statements if it is required by a specific Dutch GAAP Accounting Standard (e.g. onerous contracts – chapter 3.10)

An entity recognises any item meeting the definition of an asset or a liability in the financial statements unless it affects the relevance, or the faithful representation of the information provided:

- its 'relevance' may be affected if there is uncertainty about the existence of an asset or liability or the probability of an inflow or outflow of economic benefits from the asset or liability is low; and
- its 'faithful representation' may be affected by high measurement uncertainty.

An item is derecognised from the financial statements when it no longer meets the definition of an asset or liability. This is accompanied by appropriate presentation and disclosure.

The term 'probable' is not defined in the Conceptual Framework, although it is defined in the provision standard as more likely than not (chapter 3.10). However, higher thresholds cannot be ruled out for standards with a specific definition.

#### Transactions with equity holders

Transactions with shareholders in their capacity as shareholders are recognised directly in equity e.g. capital contributions from shareholders or dividends paid. However, the position is less clear when a transaction with a shareholder equally could have been with a third party. In these cases, the accounting is generally based on whether the shareholder was acting as a 'normal' counterparty.

#### Measurement

The Conceptual Framework describes two measurement bases and the factors to consider when selecting a measurement basis.

- **Historical cost:** measurement is based on information derived from the transaction price and that measurement is not changed unless it relates to impairment of an asset or a liability becoming onerous.
- **Current value:** measurement is based on information that reflects current conditions at the measurement date. It includes fair value, value in use and fulfilment value that are based on the present value of cash flows and current cost.

#### References:

The Conceptual Framework for Financial Reporting, IAS 1, IAS 37

Like IFRS Accounting Standards, an item that meets the definition of an asset or liability should be recognised if:

- it is probable that any future economic benefit associated with the item will flow to or from the entity; and
- the item has a cost or value that can be measured with reliability.

Like IFRS Accounting Standards, an item is derecognised from the financial statements when it no longer meets the definition of an asset or liability. This is accompanied by appropriate presentation and disclosure.

Like IFRS Accounting Standards, the term 'probable' is not defined in the Conceptual Framework. The probability threshold would be interpreted similarly.

#### Transactions with equity holders

Like IFRS Accounting Standards, transactions with shareholders in their capacity as shareholders are recognised directly in equity. Other transactions with equity holders should be considered carefully in determining the appropriate accounting.

#### Measurement

Like IFRS Accounting Standards, financial statements are prepared on a modified historical cost basis with a growing emphasis on fair value.

Unlike IFRS Accounting Standards, the term 'current value' (actuele waarde) is used in DCC instead of 'fair value', and its meaning (current cost, value in use, net realisable value or fair value) depends on the type of asset or liability and the specific circumstances.

#### References:

DCC, Framework, RJ 100, RJ 115, RJ 170



# 2 General issues

## 2.1 Form and components of financial statements

IFRS Accounting Standards	Dutch GAAP
<p>An entity with one or more subsidiaries presents consolidated financial statements unless specific criteria are met (e.g. for intermediate holding companies).</p> <p>There is no requirement to present the parent entity's financial statements in addition to consolidated financial statements, although this is permitted.</p> <p>The following elements are presented as a complete set of financial statements:</p> <ul style="list-style-type: none"> <li>• a statement of financial position;</li> <li>• a statement of profit or loss and other comprehensive income (statement of comprehensive income);</li> <li>• a statement of changes in equity;</li> <li>• a statement of cash flows; and</li> <li>• notes to the financial statements, comprising material accounting policy information and other explanatory information.</li> </ul> <p>IFRS Accounting Standards do not require a management report. The IASB did, however, publish the practice statement 'Management Commentary' (2010), in which the principles and the minimum elements of a directors' report are set out in detail. Its objective is to help management provide useful management commentary in respect of financial statements prepared in accordance with IFRS Accounting Standards. The document does not have the status of a standard but contains a 'non-binding framework' that can be applied voluntarily.</p>	<p>Like IFRS Accounting Standards, an entity presents consolidated financial statements unless specific criteria are met. The specific criteria are slightly different from those in IFRS Accounting Standards.</p> <p>Unlike IFRS Accounting Standards, company financial statements ('separate financial statements') must always be presented.</p> <p>A set of (separate and, if applicable, consolidated) financial statements comprises:</p> <ul style="list-style-type: none"> <li>• a statement of financial position (balance sheet);</li> <li>• an income statement (profit and loss account);</li> <li>• a statement of cash flows;</li> <li>• a statement of comprehensive income, which can be presented as a primary statement or combined with the note on group equity or as extension on the income statement; and</li> <li>• notes to the financial statements, comprising a summary of significant accounting policies and other explanatory information.</li> </ul> <p>Unlike IFRS Accounting Standards, a statement of changes in equity is not required in the consolidated financial statements, only in the (mandatory) separate financial statements.</p> <p>The statement of changes in equity (when presented), the statement of cash flows and the statement of comprehensive income may be presented in the notes.</p> <p>Unlike IFRS Accounting Standards, Dutch law requires that besides (separate and, if applicable, consolidated) financial statements, a management report (directors' report) and 'Other information' shall be included in the annual report.</p> <p>The primary obligation of Dutch companies that apply IFRS Accounting Standards is compliance with Dutch legislation with regard to their management report. On top of the legal provisions, these companies can also apply the practice statement of the IASB (insofar as this is not contrary to Dutch law).</p>

In addition, a statement of financial position as at the beginning of the preceding period is presented when an entity restates comparative information following a change in accounting policy, the correction of an error or the reclassification of material items in the financial statements.

The notes must be supplemented by a segment report in case the entity's debt or equity instruments are traded in a public market.

IFRS Accounting Standards specify minimum disclosures for material information; however, they do not prescribe specific formats.

Comparative information is required for the preceding period only, but additional periods and information may be presented.

An entity should disclose information that enables users of its financial statements to evaluate the entity's objectives, policies and processes for managing capital.

**References:**  
IAS 1, IFRS 10, IFRS Practice Statement 2

Unlike IFRS Accounting Standards, there is no requirement to present a 'third' statement of financial position in case of a change in accounting policy, a correction of an error or a reclassification of material items in the financial statements.

Unlike IFRS Accounting Standards, there is a minimum prescribed disclosure requirement for segment reporting. For further voluntary disclosures, the RJ implemented the main rules of IFRS 8 (chapter 5.2).

Prescriptive formats exist for the balance sheet and income statement; therefore, differences from IFRS Accounting Standards may exist in practice.

Like IFRS Accounting Standards, comparative information is required for the preceding period only, but additional periods and information may be presented.

Unlike IFRS Accounting Standards, Dutch GAAP has no comparable requirement for disclosing information that enables users of its financial statements to evaluate the entity's objectives, policies and processes for managing capital.

**References:**  
DCC, RJ 110, RJ 217, RJ 265, RJ 350, RJ 360, RJ 400, Annual Accounts Formats Decree (Besluit Modellen Jaarrekening)

## 2.2 Statement of financial position (Balance Sheet)

IFRS Accounting Standards	Dutch GAAP
<p>There is no prescribed format, i.e. an entity can choose to present the statement of financial position in a horizontal or in a vertical layout. As a minimum, the statement of financial position shall include the following line items:</p> <p><b>Assets</b></p> <ul style="list-style-type: none"> <li>• Property, plant and equipment</li> <li>• Investment property</li> <li>• Intangible assets and goodwill</li> <li>• Financial assets</li> <li>• Investments accounted for using the equity method</li> <li>• Deferred tax assets</li> <li>• Biological assets</li> <li>• Inventories</li> <li>• Trade and other receivables</li> <li>• Cash and cash equivalents</li> <li>• Assets classified as held for sale in accordance with IFRS 5</li> <li>• Assets for current tax</li> </ul>	<p>According to the DCC, large entities should choose between two balance sheet formats, model A and B. In the Annual Accounts Formats Decree specific guidance is provided. In accordance with this Decree, the statement of financial position shall include (as a minimum) the following line items:</p> <p><b>Assets</b></p> <p><b>Non-current assets (x)</b></p> <ul style="list-style-type: none"> <li>• Intangible fixed assets</li> <li>• Tangible fixed assets</li> <li>• Financial fixed assets</li> </ul> <p><b>Current assets (x)</b></p> <ul style="list-style-type: none"> <li>• Inventories</li> <li>• Receivables</li> <li>• Securities</li> <li>• Cash</li> </ul>



## Liabilities

- Trade and other payables
- Provisions
- Financial liabilities
- Liabilities or current tax
- Liabilities classified as held for sale in accordance with IFRS 5
- Deferred tax liabilities

## Equity

- Issued capital and reserves attributable to owners of the parent
- Non-controlling interests

However, following the concept of materiality, it may be possible to aggregate two or more of these line items with disclosure of disaggregation in the notes. In contrast, it may be necessary to present further line items or disaggregation of line items in the statement of financial position, if certain criteria are met.

The current/non-current classification is required except when a liquidity presentation is more relevant.

For financial institutions it is presumed that a liquidity presentation is more relevant.

An asset is classified as current if it meets any of the following conditions:

- It is expected to be realised or is held for sale or consumption in the entity's normal operating cycle.
- It is primarily held for trading purposes.
- It is expected to be realised within 12 months of the reporting date.
- It is cash and cash equivalent, that is not restricted from being exchanged or used to settle a liability for at least 12 months after the reporting date.

All other assets shall be classified as non-current.

## Equity and Liabilities

### Equity (x) (y)

- Issued capital
- Share premium
- Revaluation reserve
- Legal reserves
- Statutory reserves
- Other reserves
- Unappropriated result

### Provisions (x)

### Non-current liabilities (x)

### Current liabilities (x)

The items marked with (x) should not be renamed. The order of the items mentioned in the applied model should not be changed.

In the consolidated statement of financial position, equity (y) may be presented as one line item under the heading 'Group equity'. Non-Controlling Interest (NCI) is also presented under this heading.

There is flexibility to present additional line items or disaggregation of line items in the statement of financial position.

Like IFRS Accounting Standards, the current/non-current classification is required except when a liquidity presentation is more relevant.

For financial institutions it is presumed that a liquidity presentation is more relevant.

The current/non-current criteria for assets are similar to IFRS Accounting Standards.

A liability is classified as current if it meets any of the following conditions:

- It is expected to be settled in the entity's normal operating cycle.
- It is primarily held for trading purposes.
- It is due to be settled within 12 months after the reporting date.
- The legal entity does not have an unconditional right to defer settlement of the liability for at least twelve months after the balance sheet date.

A liability that is payable on demand because certain covenants are breached is classified as current even if the lender has agreed after the reporting date but before the financial statements are authorised for issue, not to demand repayment.

There is no specific guidance for a loan arrangement subject to a subjective acceleration clause. Classification is based on whether the entity has an unconditional right to defer settlement for at least 12 months after the reporting date.

All other liabilities shall be classified as non-current. However, deferred tax assets or liabilities are always classified as non-current.

A financial asset and liability are offset and reported net only when the entity has a legally enforceable right to offset and either intends to settle on a net basis or to settle both amounts simultaneously.

In case of early redemption (or an agreement thereto) of a liability after reporting date but before the date of preparation of financial statements, an entity presents such a liability as non-current in the balance sheet.

The existence of an entity's right to defer settlement of a liability for at least 12 months after the reporting date may be subject to compliance with covenants. Only covenants with which an entity must comply on or before the reporting date are considered when assessing classification of liabilities arising from loan arrangements.

Unlike IFRS Accounting Standards, for liabilities the current/non-current distinction should be based on the criterion whether the counterparty could redeem the liability within 12 months after the balance sheet date (if yes: current liability; if no: non-current liability).

Unlike IFRS Accounting Standards, in case of breach of debt covenants a liability may continue to be classified as non-current if an agreement has been reached with the lender after the reporting date but before the financial statements are prepared.

Unlike IFRS Accounting Standards, deferred tax liabilities should be presented as a provision. A deferred tax asset should be presented as a current receivable if it is expected to be received within 12 months after the balance sheet date; if not, it should be presented as a financial fixed asset.

Unlike IFRS Accounting Standards, the non-current / current classification only applies to debts according to Dutch Law and RJ. Provisions are in a separate category. The non-current part of the provisions shall be disclosed in the notes only.

Like IFRS Accounting Standards, a financial asset and liability are offset and reported net only when the entity has a legally enforceable right to offset and either intends to settle on a net basis or to settle both amounts simultaneously.

Unlike IFRS Accounting Standards, in case of early redemption (or an agreement thereto) of a liability after balance sheet date but before the date of preparation of financial statements, an entity may elect to present such a liability as non-current or as current in the balance sheet.

The ability of an entity to defer settlement of a liability for at least 12 months from the reporting date may be subject to compliance with covenants. Like IFRS Accounting Standards, only covenants with which an entity must comply on or before the reporting date are considered when assessing classification of the liability.



<p><b>Forthcoming requirements</b></p> <p>There are no forthcoming requirements under IFRS.</p>	<p>In this case, the debt is classified as non-current. However, as an alternative, it is permitted to classify the debt as current. The application of this alternative must be disclosed.</p> <p><b>Forthcoming requirements</b></p> <p><b>Current vs Non-Current classification of loans</b></p> <p>The amendments clarify the scenario in which, on the reporting date, the loan covenants included in the long-term loan agreement are met, but it is expected that the covenants will be breached within 12 months after the balance sheet date. In this case, the debt is classified as long-term (non-current). However, as an alternative, it is permitted to classify the debt as short-term (current). The application of this alternative should be disclosed. The chosen presentation method should be applied consistently. These amendments become effective from 1 January 2025.</p>
<p><b>References:</b> IAS 1, IAS 12</p>	<p><b>References:</b> DCC, RJ 240, RJ 272, Annual Accounts Formats Decree (Besluit Modellen Jaarrekening)</p>

### 2.3 Statement of comprehensive income (Income Statement)

IFRS Accounting Standards	Dutch GAAP
<p>An entity is required to present a statement of comprehensive income either in a single statement, or in two statements comprised of a separate statement of profit or loss followed immediately by a separate statement of comprehensive income (beginning with profit or loss and displaying components of other comprehensive income (OCI)).</p> <p>Although IFRS Accounting Standards require certain items to be presented in the statement of profit or loss and OCI, there is no prescribed format.</p> <p>Revenue comprises income arising in the course of an entity's ordinary activities and is presented as a separate line item in the statement of profit or loss and OCI.</p>	<p>According to the DCC, large entities should choose between two income statement formats (model E and F). In the Annual Accounts Formats Decree specific guidance is provided. The formats differ in form of presentation of expenses (by function versus by nature).</p> <p>Unlike IFRS Accounting Standards, the RJ recommends presenting the statement of comprehensive income ('totalresultaat') supplementary to the consolidated balance sheet, profit and loss account and cash flow statement. It may also be disclosed as part of the equity movements schedule in the notes, or as an extension to the profit and loss account. The comprehensive income statement is only required for large entities that prepare consolidated financial statements.</p> <p>Like IFRS Accounting Standards, revenue is income that arises in the course of an entity's ordinary activities and is presented as a separate line item in the statement of profit or loss and OCI.</p>

<p>An analysis of expenses is required, either by their nature or by function, on the face of the statement of profit or loss and OCI or in the notes to the financial statements.</p> <p>An analysis of expenses is required, either by their nature or by function, on the face of the statement of profit or loss and OCI or in the notes to the financial statements.</p> <p>As a minimum, the income statement or the income statement section shall include the following line items:</p> <ul style="list-style-type: none"> <li>• Revenue</li> <li>• Finance costs</li> <li>• Share of the profit or loss of associates and joint ventures accounted for using the equity method</li> <li>• Tax expense</li> <li>• A single amount for the total of discontinued operations</li> <li>• Separate presentation of the result for the period attributable to owners of the company and non-controlling interests.</li> </ul> <p>An example of a classification using the nature of expense method is as follows:</p> <ul style="list-style-type: none"> <li>• Revenue</li> <li>• Other income</li> <li>• Changes in inventories of finished goods and work in progress</li> <li>• Raw materials and consumables used</li> <li>• Employee benefit expense</li> <li>• Depreciation and amortisation expense</li> <li>• Other expenses</li> <li>• Total expenses</li> <li>• Profit before tax</li> </ul> <p>An example of a classification using the function of expense method is as follows:</p> <ul style="list-style-type: none"> <li>• Revenue</li> <li>• Cost of sales</li> <li>• Gross profit</li> <li>• Other income</li> <li>• Distribution expenses</li> <li>• Other expenses</li> <li>• Profit before tax</li> </ul>	<p>Like IFRS Accounting Standards, an analysis of expenses is required, either by their nature or by function, on the face of the income statement or in the notes to the financial statements.</p> <p>In accordance with the Annual Accounts Formats Decree, the income statement format (format E, expenses by nature) includes (as a minimum) the following line items:</p> <ul style="list-style-type: none"> <li>• Net turnover</li> <li>• Change in inventories of finished goods and in work in progress</li> <li>• Capitalised production (on behalf of own business)</li> <li>• Other operating income</li> <li>• Total operating income</li> <li>• Costs of raw materials and supplies</li> <li>• Costs of subcontracted work and other external costs</li> <li>• Wages and salaries</li> <li>• Social security costs</li> <li>• Amortisation/depreciation of intangible and tangible fixed assets</li> <li>• Other changes in value of intangible and tangible fixed assets</li> <li>• Impairment of current assets</li> <li>• Other operating expenses</li> <li>• Total operating expenses</li> <li>• Income from receivables attributable to fixed assets and from investments</li> <li>• Interest receivable and similar income</li> <li>• Changes in value of receivables attributable to fixed assets and of investments</li> <li>• Interest payable and similar charges</li> <li>• Result before tax</li> <li>• Tax</li> <li>• Share of result from participating interests</li> <li>• Result after tax</li> </ul> <p>In accordance with the Annual Accounts Formats Decree, the income statement format (format F, expenses by function) includes (as a minimum) the following line items:</p> <ul style="list-style-type: none"> <li>• Net turnover</li> <li>• Cost of sales</li> <li>• Gross margin on turnover</li> <li>• Selling and distribution expenses</li> <li>• General and administrative expenses</li> <li>• Total operating expenses</li> <li>• Net result on turnover</li> <li>• Other operating income</li> <li>• Income from receivables attributable to fixed assets and from investments</li> <li>• Interest receivable and similar income</li> <li>• Changes in value of receivables attributable to fixed assets and of investments</li> <li>• Interest payable and similar charges</li> <li>• Result before tax</li> <li>• Tax</li> <li>• Share of result from participating interests</li> <li>• Result after tax</li> </ul>



<p>When the entity chooses the function of expense method, then it shall disclose additional information on the nature of expenses in the notes.</p> <p>However, following the concept of materiality, it may be possible to aggregate two or more of these line items with disclosure of disaggregation in the notes. In contrast, it may be necessary to present further line items or disaggregation of line items in the statement of comprehensive income, if certain criteria are met.</p> <p>The presentation of alternative earnings measures is not prohibited either in the statement of profit or loss and OCI or in the notes to the financial statements.</p> <p>In our view, the use of the terms 'unusual' or 'exceptional' should be infrequent and reserved for items that justify greater prominence.</p> <p>The presentation or disclosure of items of income and expense characterised as 'extraordinary items' is prohibited.</p> <p>Items of income and expenses are not offset unless required or permitted by another standard, or if the amounts relate to similar transactions or events that are not material.</p> <p>An entity presents the items of other comprehensive income (OCI) that will be reclassified to profit or loss in the future if certain conditions are met separately from those that will never be reclassified to profit or loss. If OCI is presented before the related tax effects, then the disclosure of the related tax effects also distinguishes between these components of OCI.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP is more prescriptive in the required line items that should be presented in the income statement</p> <p>Like IFRS Accounting Standards, when applying the function of expense method, additional disclosures of certain information under the nature of expense method in the notes to the financial statements are required.</p> <p>Unlike IFRS Accounting Standards, the presentation of alternative performance measures can only be used in the notes to the profit and loss account and not on the face of the income statement itself.</p> <p>Unlike IFRS Accounting Standards, separate presentation of exceptional items is not in accordance with the models of the profit and loss account in the Annual Accounts Formats Decree. These exceptional gains and losses should be included in the relevant items in the profit and loss account. If an exceptional item is included in several other items in the statement of income, the total financial effect of this exceptional item should be explained.</p> <p>Like IFRS Accounting Standards, presentation or disclosure of items characterised as 'extraordinary items' is not permitted.</p> <p>Like IFRS Accounting Standards, items of income and expense are not offset, unless required or permitted by another RJ or when the amounts relate to similar transactions or events that are not material.</p> <p>Unlike IFRS Accounting Standards, there is no requirement to differentiate in the presentation between OCI items to be reclassified to profit and loss, and OCI items never to be reclassified to profit or loss.</p>
<p><b>References:</b> IAS 1</p>	<p><b>References:</b> DCC, RJ 135, RJ 240, RJ 265, RJ 270, Annual Accounts Formats Decree (Besluit modellen jaarrekening)</p>

## 2.4 Statement of changes in equity

IFRS Accounting Standards	Dutch GAAP
<p>An entity presents both a statement of profit or loss and other comprehensive income and a statement of changes in equity as part of a complete set of financial statements. The statements cannot be combined.</p> <p>All owner-related changes in equity are presented in the statement of changes in equity, separately from non-owner changes in equity.</p> <p>The statement of changes in equity presents line items distinguishing between profit or loss, other comprehensive income and transactions with owners in their capacity as owners, showing separately contributions, distributions and changes in ownership interests in subsidiaries that do not result in a loss of control.</p> <p>The statement of changes in equity also presents columns for each component of equity, presenting a subtotal for all components that are attributable to owners of the parent.</p> <p>This matrix approach results in a reconciliation for each component of equity between the carrying amount at the beginning and the end of the period.</p>	<p>Unlike IFRS Accounting Standards, the comprehensive income statement and the statement of changes in equity are not primary statements and may be presented as part of the notes to the consolidated financial statements.</p> <p>Unlike IFRS Accounting Standards, a detailed presentation of equity components and changes therein should be disclosed in the company's financial statements. It is allowed to present the components of equity and changes therein also in the consolidated financial statements.</p> <p>Like IFRS Accounting Standards, owner-related changes in equity are disclosed separately from non-owner changes in equity.</p>
<p><b>References:</b> IAS 1</p>	<p><b>References:</b> DCC, RJ 240, RJ 265</p>

## 2.5 Statement of cash flows

IFRS Accounting Standards	Dutch GAAP
<p>The statement of cash flows is presented as a primary statement.</p>	<p>Unlike IFRS Accounting Standards, the statement of cash flows is not a primary statement but instead may be presented as part of the notes to the consolidated financial statements, although this is not common practice.</p> <p>Unlike IFRS Accounting Standards, a statement of cash flows is not required for small and micro size entities and intermediate holding companies whose parent presents consolidated financial statements including a cash flow statement that is equivalent to the one required by Dutch GAAP.</p>



<p>Cash flows are inflows and outflows of cash and cash equivalents.</p>	<p>Like IFRS Accounting Standards, cash flows are inflows and outflows of cash and cash equivalents.</p>
<p>Cash and cash equivalents in the balance sheet is similar as used for preparing a cash flow statement.</p>	<p>Like, IFRS Accounting Standards, DASB has amended the short-term highly liquid assets to the term 'cash equivalents' to ensure consistency within the Standards (2024). For the purpose of the cash flow statement, cash and cash equivalents ('geldmiddelen') are now defined as cash ('liquide middelen'), demand deposits and cash equivalents. Cash equivalents are highly liquid assets that can be easily converted into cash without restrictions, and subject to an insignificant risk of changes in value.</p>
<p>'Cash' comprises cash on hand and demand deposits. 'Demand deposits' are not defined in IFRS, but in our view they should have the same level of liquidity as cash and, therefore, should be available to be withdrawn at any time without penalty.</p>	<p>Unlike IFRS Accounting Standards, cash in the balance sheet comprises cash on hand, balances on bank accounts, bills of exchange and cheques. Demand deposits and suchlike may be recognised as cash if they are in fact available on demand, albeit with loss of interest income.</p>
<p>'Cash equivalents' are short-term highly liquid investments that are readily convertible to known amounts of cash and are subject to an insignificant risk of changes in value.</p>	<p>Like IFRS Accounting Standards, for the purposes of preparing a cash flow statement, cash and cash equivalents are defined as cash on hand, balances on bank accounts, bills of exchange and cheques, demand deposits and short-term highly liquid assets. The short-term highly liquid assets are investments that are readily convertible without restriction and with insignificant risk of a change in value as a result of the transaction.</p>
<p>Bank overdrafts are classified as liabilities in the balance sheet.</p>	<p>Like IFRS Accounting Standards, bank overdrafts are classified as liabilities in the balance sheet.</p>
<p>For the purposes of preparing a cash flow statement, bank overdrafts that are repayable on demand are included in cash and cash equivalents only if they form an integral part of the entity's cash management.</p>	<p>Like IFRS Accounting Standards, bank overdrafts that are repayable on demand are included in cash and cash equivalents only if they form an integral part of the entity's cash management.</p>
<p>The statement of cash flows presents cash flows during the period, classified by operating, investing and financing activities.</p>	<p>Like IFRS Accounting Standards, cash flows are classified by operating, investing and financing activities.</p>
<p>The separate components of a single transaction are classified as operating, investing or financing.</p>	<p>Like IFRS Accounting Standards, the separate components of a single transaction are classified as operating, investing or financing.</p>
<p>Net cash flows from all three activities are totalled to show the change in cash and cash equivalents during the period, which then is used to reconcile opening and closing cash and cash equivalents.</p>	<p>Like IFRS Accounting Standards, net cash flows from all three activities are totalled to show the change in cash and cash equivalents during the period, which then is used to reconcile opening and closing cash and cash equivalents.</p>
<p>Cash flows from operating activities may be presented either by the direct or the indirect method. If the indirect method is used, then an entity presents a reconciliation of profit or loss to net cash flows from operating activities. However, in our experience practice varies regarding the measure of profit or loss is used.</p>	<p>Like IFRS Accounting Standards, cash flows from operating activities may be presented either by the direct or the indirect method. Unlike IFRS Accounting Standards, the preferred starting point is the operating result. Alternatively, the result before or after tax may also be used.</p>

<p>An entity chooses its own policy for classifying each of interest and dividends paid as operating or financing activities, and interest and dividends received as operating or investing.</p>	<p>Like IFRS Accounting Standards, dividends and interest received can be classified as operating or investing activities. Dividends paid and interest paid can be considered as operating activities or financing activities. However, classification of dividends paid as financing activities is preferred.</p>
<p>Income taxes paid are classified as operating activities unless it is practicable to identify them with, and therefore classify them as, financing or investing activities.</p>	<p>Like IFRS Accounting Standards, income taxes paid (and received) are classified as operating activities, unless it is practicable to identify them with, and therefore classify them as, financing or investing activities.</p>
<p>Foreign currency cash flows are translated at the exchange rates at the dates of the cash flows (or using averages when appropriate).</p>	<p>Like IFRS Accounting Standards, foreign currency cash flows are translated at the exchange rate at the date of the cash flow (or using averages when appropriate).</p>
<p>Generally, all financing and investing cash flows are reported gross. Cash flows are offset only in limited circumstances.</p>	<p>Like IFRS Accounting Standards, all financing and investing cash flows should be presented gross and not offset. However, no guidance is provided on the types of items that qualify for net reporting.</p>
<p>To help users evaluate changes in liabilities related to financing activities, an entity provides a disclosure, including cash and non-cash changes.</p>	<p>Similar disclosure of material differences between items in the statement of cash flows and statements of changes in assets and liabilities is a recommended reconciliation.</p>
<p>An extensive disclosure on the effects of acquisition and sale of group companies and other business units is required.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP has no extensive specific requirements concerning disclosure on the effects of acquisition and sale of group companies and other business units.</p>
<p>An entity with reverse factoring (supplier finance) arrangements discloses information that enables users of the financial statements to assess the effects of the arrangements on the entity's liabilities and cash flows and its exposure to liquidity risk. These disclosures, which are generally provided on an aggregated basis, include qualitative and quantitative information, such as:</p> <ul style="list-style-type: none"> <li>• terms and conditions of the arrangements;</li> <li>• carrying amounts and associated line items in the statement of financial position for financial liabilities that are part of the arrangements and amounts for which the supplier has already been paid;</li> <li>• the range of payment due dates; and</li> <li>• the type and effect of non-cash changes in carrying amounts of financial liabilities that are part of the arrangements.</li> </ul>	<p>Unlike IFRS Accounting Standards, Dutch GAAP has no specific disclosure requirements regarding reverse factoring (supplier finance) arrangements. Dutch GAAP requires reporting entities to provide notes to the cash flow statement addressing the aspects significant to a good understanding of the cash flow statement.</p>
<p><b>References:</b> IAS 7</p>	<p><b>References:</b> RJ 360</p>

## 2.6 Fair value measurement

IFRS Accounting Standards	Dutch GAAP
<p>The fair value measurement standard applies to most fair value measurements and disclosures (including measurements based on fair value) that are required or permitted by other standards.</p> <p>Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date – i.e. it is an ‘exit price’.</p> <p>Fair value is based on assumptions that market participants would use in pricing the asset or liability. ‘Market participants’ are independent of each other, they are knowledgeable and have a reasonable understanding of the asset or liability, and they are willing and able to transact.</p> <p>Fair value measurement assumes that a transaction takes place in the principal market for the asset or liability or, in the absence of a principal market, in the most advantageous market for the asset or liability.</p> <p>What is being measured – e.g. a stand-alone asset or a group of assets and/or liabilities – generally depends on the unit of account, which is established under the relevant standard.</p> <p>In measuring the fair value of an asset or a liability, an entity selects those valuation techniques that are appropriate in the circumstances and for which sufficient data is available to measure fair value. The techniques used should maximise the use of relevant observable inputs and minimise the use of unobservable inputs.</p> <p>A day one gain or loss arises when the transaction price for an asset or liability differs from its fair value on initial recognition. Such gain or loss is recognised in profit or loss, unless the standard that requires or permits fair value measurement specifies otherwise. For example, the financial instruments standards prohibit the immediate recognition of a day one gain or loss, unless fair value is evidenced by a quoted price in an active market for an identical financial asset or financial liability or is based on a valuation technique whose variables include only data from observable markets.</p> <p>A fair value measurement of a non-financial asset considers a market participant’s ability to generate economic benefits by using the asset in its highest and best use, or by selling it to another market participant who will use the asset in its highest and best use.</p>	<p>Dutch GAAP has no specific accounting standard on fair value measurement. The definitions and measurement criteria of current value are set out in the Current Value Decree (‘Besluit actuele waarde’).</p> <p>The Current Value Decree describes four current value measurement methods.</p> <p>The most appropriate measurement method depends on the type of asset, liability and relevant circumstances. The Current Value Decree describes the following methods:</p> <ol style="list-style-type: none"> <li>current cost</li> <li>value in use</li> <li>market value (fair value)</li> <li>net realisable value</li> </ol> <p>The RJ guidelines provide further rules on these methods and the assets, liabilities and circumstances in which these methods should be applied.</p> <p>Fair value of an asset or liability is defined as the value that is based on market prices or on data relevant as per date of measurement.</p> <p>There is very limited guidance on how to determine the fair value of an asset or liability. No strict fair value hierarchy is described.</p>

If certain conditions are met, then an entity is permitted to measure the fair value of a group of items with offsetting risk positions on the basis of its net exposure (portfolio measurement exception). Such items may be a group of financial assets and financial liabilities or other contracts that are in the scope of the financial instruments standard.

For liabilities or an entity’s own equity instrument, if a quoted price for a transfer of an identical or similar liability or own equity instrument is not available and the identical item is held by another entity as an asset, then the liability or own equity instrument is valued from the perspective of a market participant that holds the asset. Failing that, other valuation techniques are used to value the liability or own equity instrument from the perspective of a market participant that owes the liability or has issued the claim on equity.

The fair value of a liability reflects non-performance risk. Non-performance risk is assumed to be the same before and after the transfer of the liability. Non-performance risk includes, but may not be limited to, an entity’s own credit risk.

There is no practical expedient that allows entities to measure the fair value of certain investments at net asset value.

When another IFRS requires or permits an asset or a liability to be measured initially at fair value, gains or losses arising on differences between fair value at initial recognition and the transaction price are recognised in profit or loss, unless the other IFRS Standard requires otherwise.

While the fair value measurement standard discusses three general approaches to valuation (the market, income, and cost approaches), it does not establish specific valuation standards. Several valuation techniques may be available under each approach.

An entity that manages a group of financial assets and financial liabilities on the basis of its net exposure to either market risks or credit risk is permitted (but not required) to measure the fair value of a group with offsetting risk positions on the basis of its net exposure, provided certain conditions are met (portfolio measurement exception).

The inputs are categorised into three levels (Levels 1, 2 and 3), with the highest priority given to unadjusted quoted prices in active markets for identical assets or liabilities and the lowest priority given to unobservable inputs.



For fair value measurements of assets or liabilities having bid and ask prices, an entity uses the price within the bid-ask spread that is most representative of the fair value in the circumstances. The use of bid prices for assets and ask prices for liabilities is permitted.

Guidance is provided on measuring fair value when there has been a decline in the volume or level of activity in a market, and when transactions are not orderly.

The fair value measurement standard includes a comprehensive disclosure framework.

A fair value hierarchy is used to categorise fair value measurements for disclosure purposes. Fair value measurements are categorised in their entirety based on the lowest level input that is significant to the entire measurement.

**References**

IFRS 13

**References:**

Current Value Decree (Besluit actuele waarde), RJ 120, RJ 290, RJ 210, RJ 212

**2.7 Consolidation**

IFRS Accounting Standards	Dutch GAAP
<p>Consolidated financial statements are financial statements of a group in which the assets, liabilities, equity, income, expenses and cash flows of the parent and its subsidiaries are presented as those of a single economic entity.</p> <p>A group is defined as ‘a parent and all its subsidiaries’.</p>	<p>Like IFRS Accounting Standards, consolidated financial statements are financial statements of a group in which the assets, liabilities, equity, income, expenses and cash flows of the parent and its subsidiaries are presented as those of a single economic entity.</p> <p>Unlike IFRS Accounting Standards, Dutch GAAP applies the term ‘group company’, besides the term ‘group’, the latter of which is like IFRS Accounting Standards.</p> <p>The law (art 24.b) sets out a description of the term group company. Group companies are described as legal entities and companies that are interconnected in a group. In this context, a group is defined as an economic entity in which legal entities and companies are organisationally interconnected. Two elements can be derived from legislation:</p> <ul style="list-style-type: none"> <li>a) Economic entity</li> <li>b) Organisational interconnection</li> </ul>

In IFRS Accounting Standards, a subsidiary is defined as an entity over which another entity can exercise decisive influence (‘control’). This concerns the ability of directing the entity’s relevant activities in order to realise returns. In this model, it is important that ‘de facto control’ is factored into the assessment of when something is a subsidiary. Additionally, the consolidation of SPEs or ‘structured entities’ is assessed on the basis of decisive influence.

In consolidated financial statements, subsidiaries are consolidated unless a consolidation exception applies. Investments in associates and joint ventures are equity accounted, unless they are held for sale or an entity is exempted from applying the equity method in accordance with IAS 28.

In IFRS Accounting Standards, a general consolidation exemption applies only if application of IFRS provisions would have an immaterial effect.

An entity with an investment in a subsidiary is exempt from preparing consolidated financial statements only if it is an investment entity that is required to measure all of its subsidiaries at fair value through profit or loss or all of the intermediate holding exemption criteria of IFRS 10.4 are met.

A disposal group continues to be consolidated while it is held for sale or distribution even if it was acquired exclusively with the view to subsequent disposal.

IFRS includes an exemption for intermediate consolidation provided that various conditions of IFRS 10.4 are met:

- a) the parent is a wholly owned subsidiary, or is a partially owned subsidiary and its other owners (including those not otherwise entitled to vote) have been informed about, and do not object to, the parent not presenting consolidated financial statements;

From legislative history, it can also be concluded that the (third) element ‘central management’ is essential. A group is centrally managed in such a way that the party exercising control (the parent) determines a central policy for the controlled group companies, imposes and monitors the policy, adjusts where deemed appropriate or can enforce that policy.

Unlike IFRS Accounting Standards, the consolidated financial statements are the financial statements that include the legal entity and its subsidiaries in its group, and other legal entities and companies that it can control or that are centrally managed by it. Like IFRS Accounting Standards, consolidated financial statements are therefore the financial statements of a group as a whole.

Like IFRS Accounting Standards, subsidiaries are consolidated unless a consolidation exemption applies. Unlike IFRS Accounting Standards, joint ventures can be accounted for using the equity method or by proportionate consolidation.

Like IFRS Accounting Standards, Dutch law (Article 407.1) sets out consolidation exemptions for group companies that jointly are of negligible significance to the full group. Unlike IFRS Accounting Standards, Dutch law also contains a consolidation exemption for group companies of which the necessary information can only be obtained or estimated at disproportionate cost or with substantial delay.

Dutch law and the RJ contain some specific exemptions from consolidation for investment companies and investment entities if certain criteria are met.

Unlike IFRS Accounting Standards, group companies in which the company holds an interest for disposal only (as from the moment of acquisition) do not need to be included in the consolidation.

Like IFRS Accounting Standards, Dutch GAAP provides an intermediate consolidation exemption (Article 408), which entails that a company is not required to prepare consolidated financial statements, provided that the conditions of Article 408 are met. Like IFRS accounting Standards, this exemption cannot be used by legal entities with listed securities.

- b) the parent's debt or equity instruments are not traded in a public market (a domestic or foreign stock exchange or an over-the-counter market, including local and regional markets);
- c) the parent has not filed, nor is it in the process of filing, its financial statements with a securities commission or other regulatory organisation for the purpose of issuing any class of instruments in a public market; and
- d) the ultimate or any intermediate parent of the parent produces financial statements that are available for public use and comply with the Accounting Standards, such that subsidiaries are either consolidated or measured at fair value through profit or loss in accordance with IFRS 10. [IFRS 10.4(a), 4B]

IFRS Accounting Standards do not offer a group exemption for preparing financial statements.

The conditions under Dutch GAAP are different from those of IFRS Accounting Standards. According to Article 408, a legal entity is not required to prepare consolidated financial statements for a part of a group if all of the following conditions are met:

- a) No written objection has been made to the legal entity within six months of the start of the financial year against the application of the cited Article by at least 10% of the members or the holders of at least 10% of the issued capital. In order to determine the aforementioned percentage, both the shares with voting rights as well as the shares with profit-sharing rights count. This concerns an exception to the principal rule that shares without voting rights do not count for various criteria and quorums based on the held equity interest.
- b) The financial information that the legal entity should consolidate is included in the consolidated financial statements of a larger entity.
- c) The consolidated financial statements and the management report of the larger entity are prepared in accordance with the rules of the EU Accounting Directive or in accordance with the rules of one of the directives of the Council of the European Communities concerning the financial institutions and the consolidated financial statements of banks and other financial institutions or insurance companies. If these provisions need not to be observed, then the financial statements referred to must be prepared in an equivalent manner.
- d) The consolidated financial statements with auditor's report and management report of the larger entity, insofar as they are not prepared in or translated into Dutch, are prepared in or translated into French, German or English, all in the same language.
- e) Each time within six months after the balance sheet date, or within one month after a permitted later publication, the documents or translations referred to in sub d. must be filed at the offices of the (Netherlands) Trade Register. In addition to the above, the Minister of Justice and Security can designate further regulations for the financial statements which, supplemented as necessary with additional instructions given by him, will be considered equivalent to regulations in accordance with the EU Accounting Directive. It must be disclosed in the notes that use has been made of the exemption.

Unlike IFRS Accounting Standards, Dutch GAAP provides a group exemption (Article 403), which entails that a legal entity belonging to a group (guaranteed group company) is not required to prepare its financial statements according to the provisions of Title 9, provided that the conditions of Article 403 are met. The conditions for the application of Article 403 are the following:

- a) The balance sheet of the guaranteed group company presents in any case the sum of the fixed assets, the sum of the current assets, and the amounts of the equity, of the provisions and of the debts, and the profit and loss account presents in any case the result from the ordinary operations and the balance of the other income and expenses, all of which after taxes.
- b) The members or shareholders of the guaranteed group company have declared in writing after the commencement of the financial year and before the adoption or approval of the financial statements to consent to the derogation (hereinafter: declaration of consent).
- c) The financial information of the guaranteed group company is consolidated by another legal entity or company in consolidated financial statements, to which, pursuant to the applicable law, the directive of the European Parliament and the Council concerning the application of international standards for financial statements (the IAS regulation), the EU Accounting Directive or one of the two directives of the Council of the European Communities concerning the financial statements and the consolidated financial statements of banks and other financial institutions or insurance companies apply.
- d) The consolidated financial statements referred to under c., insofar as not prepared in or translated into Dutch, shall be prepared in or translated into French, German or English.
- e) In case of the consolidated financial statements referred to under c., an auditor's report shall be issued and management report shall be prepared. The auditor's report and the management report shall be prepared in or translated into the same language as the consolidated financial statements.
- f) The legal entity or company referred to under c. has provided a written declaration of being jointly and severally liable for the debts arising from the legal acts of the legal entity (hereinafter: declaration of assumption of liability).
- g) The declaration of consent (see b.) and the declaration of assumption of liability (see f.) shall be filed at the offices of the (Netherlands) Trade Register. Furthermore, within six months after the balance sheet date or within one month after a permitted later publication:
  - the consolidated financial statements (see d.); and
  - the auditor's report (see e.); and
  - the management report (see e.),
 shall be filed at the offices of the (Netherlands) Trade Register.



<p>Consolidation is based on a 'power to direct' model. An investor controls an investee if it is exposed to (has rights to) variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. Although there is a practical distinction between structured and non-structured entities, the same control model applies to both.</p> <p>For a structured entity, voting rights are not the dominant factor in assessing whether the investor has power over the investee.</p> <p>Subsidiaries are generally consolidated.</p> <p>As an exception, investment entities generally account for investments in subsidiaries at fair value recognised through profit or loss.</p> <p>Control is usually assessed over a legal entity but can also be assessed over only specified assets and liabilities of an entity (referred to as a 'silo') when certain conditions are met.</p> <p>Control is assessed on a continuous basis.</p> <p>In assessing control, an investor considers both substantive rights that it holds and substantive rights held by others. To be 'substantive' rights need to be exercisable when decisions about the relevant activities are required to be made and the holder needs to have practical ability to exercise those (potential voting) rights.</p>	<p>The guaranteed legal entity does not need to prepare consolidated financial statements and preparing separate financial statements will suffice. These separate financial statements only comprise a short-form balance sheet and a limited profit and loss account. These do not require to be audited. The group exemption cannot be applied by public interest entities (OOBs).</p> <p>Unlike IFRS Accounting Standards, consolidation under Dutch GAAP is focused on the concept of a group (company) and on control. The main criteria for a group (company) are:</p> <ul style="list-style-type: none"> <li>• Economic unity</li> <li>• Organisational interconnection</li> <li>• Central management</li> </ul> <p>The existence of a group relationship depends on whether one entity has the ability to exercise decisive influence (control) over another entity, or in other words actually determines the policy of that other (policy-dependent) entity.</p> <p>Like IFRS Accounting Standards, special purpose entities need to be evaluated under the main consolidation criteria of Dutch GAAP.</p> <p>Like IFRS Accounting Standards, subsidiaries in the group, other group companies, and other legal entities over which an entity can exercise control or over which it has central management are generally consolidated.</p> <p>Unlike IFRS Accounting Standards, there is no general consolidation exemption for investment entities. Instead, interests that are held exclusively with a view to their disposal do not need to be consolidated in the consolidated financial statements. For investment entities and participation companies this means that a concrete exit strategy regarding interests in subsidiaries should be defined from the date of acquisition.</p> <p>Unlike IFRS Accounting Standards, no guidance exists regarding assessing control over only specified assets and liabilities of an entity (referred to as a 'silo'). Generally, the consolidation assessment is performed over legal entities.</p> <p>Like IFRS Accounting Standards, the consolidation assessment is done on a continuous basis.</p> <p>Like IFRS Accounting Standards, facts and circumstances determining the ability of having de facto control should be considered as well. However, the assessment under IFRS Accounting Standards might be more strict and conclusive.</p>
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<p>Power is assessed with reference to the investee's relevant activities, which are the activities that most significantly affect the returns of the investee. As part of its analysis, the investor considers the purpose and design of the investee, how decisions about the activities of the investee are made, and who has the current ability to direct those activities.</p> <p>The assessment of power over an investee includes considering the following factors:</p> <ul style="list-style-type: none"> <li>• determining the purpose and design of the investee;</li> <li>• identifying the population of relevant activities; and</li> <li>• considering evidence that the investor has the practical ability to direct the relevant activities, special relationships, and the size of the investor's exposure to the variability of returns of the investee.</li> </ul> <p>In assessing whether the investor is exposed to the variability of returns of the investee, 'returns' are broadly defined and include:</p> <ul style="list-style-type: none"> <li>• distributions of the economic benefits;</li> <li>• changes in the value of the investment; and</li> <li>• fees, remunerations, tax benefits, economies of scale, cost savings and other synergies.</li> </ul> <p>An investor that has decision-making power over an investee and exposure to variability in returns determines whether it acts as a principal or as an agent to determine whether there is a link between power and returns. If the decision maker is an agent, then the link between power and returns is absent and the decision maker's delegated power is treated as if it were held by its principal(s).</p> <p>The acquirer in a business combination can elect, on a transaction-by-transaction basis, to measure 'ordinary' non-controlling interests (NCI) at fair value, or at their proportionate interest in the net assets of the acquiree, at the date of acquisition.</p> <p>'Ordinary NCI' are present ownership interests that entitle their holders to a proportionate share of the entity's net assets in the event of liquidation. Other NCI are generally measured at fair value.</p> <p>A parent and its subsidiaries, generally, use the same reporting date when preparing consolidated financial statements.</p> <p>If this is impracticable, then the difference between the reporting date of a parent and its subsidiary cannot be more than three months. Adjustments are made for the effects of significant transactions and events between the two dates.</p>	<p>Like IFRS Accounting Standards, in assessing control (potential) voting rights are considered when they are substantive.</p> <p>Unlike IFRS Accounting Standards, Dutch GAAP does not have explicit provisions on a 'power-to-direct' model.</p> <p>Unlike IFRS Accounting Standards, Dutch GAAP does not have such specific guidance on the assessment of power.</p> <p>Unlike IFRS Accounting Standards, Dutch GAAP does not have such specific guidance on the assessment of power nor the exposure to the variability of returns of the investee.</p> <p>Unlike IFRS Accounting Standards, Dutch GAAP does not explicitly describe the link between 'principal vs agent' and 'power and returns'.</p> <p>Unlike IFRS Accounting Standards, NCI should always be measured at their proportionate interest in the identifiable net assets of the acquiree, at the acquisition date.</p> <p>Like IFRS Accounting Standards, the difference between the reporting dates of a parent and a subsidiary cannot be more than three months.</p>
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Uniform accounting policies are used throughout the group.	Like IFRS Accounting Standards, uniform accounting policies must be used throughout the group.
NCI in the statement of financial position are classified as equity but are presented separately from the parent shareholders' equity.	Unlike IFRS Accounting Standards, NCI in the statement of financial position are classified separately from equity and are presented as part of group equity. Like IFRS Accounting Standards, NCI are presented separately from the parent shareholders' equity in the disclosure notes.
An entity recognises a liability for the present value of the exercise price of put options held by NCI, but there is no detailed guidance on the accounting for such put options.	Unlike IFRS Accounting Standards, Dutch GAAP has not prescribed the accounting for put options held by NCI.
Losses in a subsidiary may create a deficit balance in NCI.	Unlike IFRS Accounting Standards, under Dutch accounting standards the negative third-party share is attributed to the majority shareholder, unless and insofar as the minority shareholder has the obligation and the ability to bear the related losses.
Profit or loss and other comprehensive income for the period are allocated between controlling shareholders and NCI.	Like IFRS Accounting Standards, profit or loss for the period is allocated between shareholders of the parent and NCI. Unlike IFRS Accounting Standards, the statement of comprehensive income starts with the net result, after NCI. Therefore, there is no split between shareholders and NCI in the statement of comprehensive income.
Intragroup transactions are eliminated in full.	Like IFRS Accounting Standards, intragroup transactions are eliminated in full.
On the loss of control of a subsidiary, the assets and liabilities of the subsidiary and the carrying amount of the NCI are derecognised. The consideration received and any retained interest (measured at fair value) are recognised. Amounts recognised in OCI are reclassified as required by other IFRS Accounting Standards. Any resulting gain or loss is recognised in profit or loss.	Unlike IFRS Accounting Standards, on the loss of control of a subsidiary, the retained interest is not remeasured at fair value. The gain or loss on disposal to be recognised in profit or loss is determined on the basis of a proportion of the carrying amount (including goodwill) that is sold. Amounts recognised in OCI are reclassified proportionally as required by other standards.
Pro rata spin-offs (demergers) are generally accounted for on the basis of fair values, and a gain or loss is recognised in profit or loss. In our view, non-pro rata spin-offs may be accounted for on the basis of fair values (gain or loss recognised in profit or loss) or book values (no gain or loss recognised).	Unlike IFRS Accounting Standards, Dutch GAAP has not prescribed guidance for the accounting of pro rata spin-offs.
Changes in the parent's ownership interest in a subsidiary without a loss of control are accounted for as equity transactions and no gain or loss is recognised.	Unlike IFRS Accounting Standards, there are no specific provisions for changes in the parent's ownership interest in a subsidiary without a loss of control. In our view, there is a policy choice how these transactions are accounted for, i.e. as transactions between shareholders or as transactions between the – consolidated – group and a third party.
The interests of the parent and NCI are adjusted to reflect the relative change in their interests in the subsidiary's equity. Any difference between the amount by which the NCI are adjusted and the fair value of the consideration paid or received, if there is any, is recognised directly in equity and attributed to the owners of the parent.	

	<ul style="list-style-type: none"> <li>• Upon acquisition of third-party interest: <ul style="list-style-type: none"> <li>– If the transaction is regarded as a shareholder transaction, the transaction is recognised directly in equity (other reserves).</li> <li>– If the transaction is regarded as a transaction with a third party, the transaction is recognised as (an increase in) goodwill.</li> </ul> </li> <li>• Upon sale of third-party interest: <ul style="list-style-type: none"> <li>– If the transaction is regarded as a shareholder transaction, the transaction is recognised directly in equity (other reserves).</li> <li>– If the transaction is regarded as a transaction with a third party, the transaction is recognised in profit or loss.</li> </ul> </li> </ul> <p>The (fair value of the) consideration received must be recognised and, next to this, the third-party interest is adjusted on the basis of the proportional share in the respective assets and liabilities of the related group company at the moment of the transaction.</p>
<b>References:</b> IFRS 10	<b>References:</b> CC, RJ 214, RJ 217, RJ 265

## 2.8 Business combinations

IFRS Accounting Standards	Dutch GAAP
Business combinations are accounted for under the acquisition method, with limited exceptions.	<i>General – note that the differences between IFRS Accounting Standards and Dutch GAAP on business combinations are numerous and that the possible impact might be significant.</i>
A business combination is a transaction or other event in which an acquirer obtains control of one or more businesses.	Most transactions within the scope of RJ 216 are accounted for as acquisitions by applying purchase accounting. However, unlike IFRS Accounting Standards, the pooling of interests method can still be used in limited situations (such as 'true mergers').
The acquirer in a business combination is the combining entity that obtains control of the other combining business or businesses.	Like IFRS Accounting Standards, a business combination is a transaction or other event in which an acquirer obtains control of one or more businesses.
In some cases, the legal acquiree is identified as the acquirer for accounting purposes (reverse acquisition).	Like IFRS Accounting Standards, the acquirer in a business combination is the combining entity that obtains control of the other combining business or businesses.
	Like IFRS Accounting Standards, the acquirer may for accounting purposes not be the legal acquirer, in which case the transaction is accounted for as a reverse acquisition.



<p>The acquisition date is the date on which the acquirer obtains control of the acquiree.</p>	<p>Like IFRS Accounting Standards, the date of acquisition is the date on which effective control is transferred to the acquirer.</p>
<p>Consideration transferred by the acquirer, which is generally measured at fair value at the acquisition date, may include assets transferred, liabilities incurred by the acquirer to the previous owners of the acquiree and equity interests issued by the acquirer.</p>	<p>Like IFRS Accounting Standards, the cost of acquisition, which is determined at the date of exchange is the amount of cash or cash equivalents paid, plus the fair value of the other purchase consideration given, including equity instruments issued and the fair value of liabilities assumed and, unlike IFRS Accounting Standards, any costs directly attributable to the acquisition.</p>
<p>Contingent consideration transferred is initially recognised at fair value. Contingent consideration classified as a liability is generally remeasured to fair value each period until settlement, with changes recognised in profit or loss. Contingent consideration classified as equity is not remeasured.</p>	<p>Unlike IFRS Accounting Standards, a liability for contingent consideration is recognised at present value if payments are likely and the amount can be measured reliably. Unlike IFRS Accounting Standards, subsequent changes in the (estimate of the) contingent consideration are adjusted to the goodwill (instead of recognised in profit or loss).</p>
<p>Any items that are not part of the business combination transaction are accounted for outside the acquisition accounting.</p>	<p>Like IFRS Accounting Standards, any items that are not part of the business combination transaction are accounted for outside the acquisition accounting.</p>
<p>The identifiable assets acquired and liabilities assumed are recognised separately from goodwill at the acquisition date if they meet the definition of assets and liabilities and are exchanged as part of the business combination.</p>	<p>Like IFRS Accounting Standards, identifiable assets acquired and liabilities assumed are recognised separately from goodwill at the acquisition date if they meet the definition of assets and liabilities and are exchanged as part of the business combination. However, unlike IFRS Accounting Standards, the acquiree's intangible assets are recognised only if they meet the (more strict) general requirements for recognition of intangibles. Also, unlike IFRS Accounting Standards, the acquiree's contingent liabilities, which do not meet the recognition criteria for provisions that an outflow of resources will be probable to settle an obligation, are not recognised.</p>
<p>The identifiable assets acquired and liabilities assumed as part of a business combination are generally measured at the acquisition date at their fair values.</p>	<p>Like IFRS Accounting Standards, the acquiree's identifiable assets and liabilities are measured at fair value at the date of acquisition.</p>
<p>There are limited exceptions to the recognition and/or measurement principles in respect of contingent liabilities, deferred tax assets and liabilities, indemnification assets, employee benefits, re-acquired rights, share-based payment awards and assets held for sale.</p>	<p>Unlike IFRS Accounting Standards, restructuring provisions related to the business combination should be recognised by the acquirer if certain strict criteria are met. Therefore, unlike IFRS Accounting Standards, those restructuring provisions could impact goodwill.</p>
<p>Goodwill is measured as a residual and is recognised as an asset. When the residual is a deficit (gain on a bargain purchase), it is recognised in profit or loss after re-assessing the values used in the acquisition accounting.</p>	<p>Like IFRS Accounting Standards, goodwill is measured as a residual and is recognised as an asset.</p>

<p>Adjustments to the acquisition accounting during the 'measurement period' (till 12 months after acquisition) reflect additional information about facts and circumstances that existed at the acquisition date. Such adjustments are made by retrospective application to the period in which the acquisition occurred and any subsequent periods.</p>	<p>Like IFRS Accounting Standards, when the fair value of the identifiable assets and liabilities exceeds the acquisition cost, the fair value should be reassessed. Unlike IFRS Accounting Standards, negative goodwill is recorded as a liability on the balance sheet. Negative goodwill in relation to future losses is realised in profit and loss when those losses are incurred. 'Other' negative goodwill is realised in profit and loss in conjunction with the depreciable non-monetary assets it relates to. Any excess negative goodwill is recognised in profit and loss immediately.</p>
<p>'Ordinary' NCI may be measured at fair value, or at their proportionate interest in the identifiable net assets of the acquiree. 'Other' NCI are generally measured at fair value.</p>	<p>Like IFRS Accounting Standards, adjustments to acquisition accounting are made for additional information about facts and circumstances that existed at the acquisition date. However, unlike IFRS Accounting Standards, the 'measurement period' for adjustments lasts longer, i.e. until the end of the first financial year following the year of acquisition.</p>
<p>If a business combination is achieved in stages (step acquisition), the acquirer's previously held non-controlling equity interest in the acquiree is remeasured to fair value at the acquisition date, with any resulting gain or loss recognised in profit or loss.</p>	<p>Unlike IFRS Accounting Standards, NCI should always be measured at their proportionate interest in the identifiable net assets of the acquiree, at the acquisition date.</p>
<p>In general, items recognised in the acquisition accounting are measured and accounted for in accordance with the relevant standards subsequent to the business combination. However, as an exception, there is specific guidance for certain items, for example in respect of contingent liabilities and indemnification assets.</p>	<p>Unlike IFRS Accounting Standards, if an acquisition is achieved in successive share purchases, then each significant transaction is accounted for separately as an acquisition. Unlike IFRS Accounting Standards, it is allowed that the acquirer remeasures its previously held assets and liabilities in the acquiree to fair value at the acquisition date, with any resulting gain or loss recognised directly in equity revaluation reserve.</p>
<p>'Push down' accounting, whereby fair value adjustments are recognised in the financial statements of the acquiree, is not allowed.</p>	<p>Like IFRS Accounting Standards, items recognised in the acquisition accounting are measured and accounted for in accordance with the relevant RJs subsequent to the business combination. Like IFRS Accounting Standards, there is specific guidance for certain items, but this guidance can be different from IFRS Accounting Standards, for example in respect of contingent liabilities.</p>
<p>The acquisition of a collection of assets that does not constitute a business is not a business combination. In such cases, the entity allocates the cost of acquisition to the assets acquired and liabilities assumed based on their relative fair values at the acquisition date. No goodwill (or bargain purchase gain) is recognised.</p>	<p>Like IFRS Accounting Standards, 'push down' accounting is not allowed.</p>
<p><b>References:</b> IFRS 3</p>	<p>Like IFRS Accounting Standards, the acquisition of a collection of assets that does not constitute a business is not a business combination. Like IFRS Accounting Standards, the entity allocates the cost of acquisition to the assets acquired and liabilities assumed based on their relative fair values at the date of acquisition, and no goodwill (or bargain purchase gain) is recognised.</p>
	<p><b>References:</b> RJ 210, RJ 214, RJ 216</p>

## 2.9 Foreign currency translation

IFRS Accounting Standards	Dutch GAAP
<p>An entity measures its assets, liabilities, income and expenses in its functional currency, which is the currency of the primary economic environment in which it operates.</p>	<p>Like IFRS Accounting Standards, an entity measures its assets, liabilities, revenues and expenses in its functional currency, which is the currency of the primary economic environment in which it operates.</p>
<p>All transactions that are not denominated in an entity's functional currency are foreign currency transactions, and exchange differences arising on translation are generally recognised in profit or loss.</p>	<p>Like IFRS Accounting Standards, all transactions that are not denominated in an entity's functional currency are foreign currency transactions, and exchange differences arising on translation are generally recognised in profit or loss.</p>
<p>At each reporting date foreign currency items shall be translated for: (i) monetary items using the closing rate (which is the spot exchange rate at the reporting date), (ii) non-monetary items at fair value using the fair value (re)measurement date, (iii) other non-monetary items using the rate at the date of transaction.</p>	<p>Like IFRS Accounting Standards, at each reporting date foreign currency items shall be translated for: (i) monetary items using the closing rate, (ii) non-monetary items at fair value using the fair value (re)measurement date, (iii) other non-monetary items using the rate at the date of transaction.</p>
<p>Exchange differences arising on translation generally are recognised in profit or loss.</p>	<p>Like IFRS Accounting Standards, exchange differences arising on translation generally are recognised in profit or loss.</p>
<p>Share capital is considered a non-monetary item and shall be translated according to the main principles, namely against the historical exchange rate.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP prescribes that share capital shall be translated using the closing rate at the reporting date.</p>
<p>The recognition of translation differences on monetary items that form a part of the net investment in a foreign operation through the equity only applies according to IAS 21 for the consolidated financial statements in which both the participating entity and the foreign operation are included. The translation differences referred to are recognised in the separate financial statements in the profit and loss account.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP makes no distinction on this point between the consolidated and the separate financial statements; the recognition of the translation differences cited through the equity applies in principle for both financial statements.</p>
<p>When an entity's functional currency is hyperinflationary, its financial statements are adjusted to state all items in the measuring unit that is current at the reporting date.</p>	<p>Like IFRS Accounting Standards, when an entity's functional currency is hyperinflationary its financial statements must be adjusted to state all items in the measuring unit that is current at the balance sheet date.</p>
<p>The financial statements of foreign operations are translated for consolidation purposes as follows: assets and liabilities are translated at the closing rate; income and expenses are translated at actual rates or appropriate averages. In our view, equity components (excluding current-year movements, which are translated at the actual rates) should not be retranslated.</p>	<p>Generally, the rules on translating the financial statements of foreign operations are similar to IFRS Accounting Standards.</p>
<p>Exchange differences arising on the translation of the financial statements of a foreign operation are recognised in other comprehensive income (OCI) and accumulated in a separate component of equity. The amount attributable to any NCI is allocated to and recognised as part of NCI.</p>	

If the functional currency of a foreign operation is the currency of a hyperinflationary economy, then current purchasing power adjustments are made to its financial statements before translation into a different presentation currency; the adjustments are based on the closing rate at the end of the current period. However, if the presentation currency is not the currency of a hyperinflationary economy, then comparative amounts are not restated (Chapter 2.12).

An entity may present its financial statements in a currency other than its functional currency (presentation currency). An entity that translates financial statements into a presentation currency other than its functional currency uses the same method as for translating financial statements of a foreign operation.

If an entity loses control of a subsidiary that is a foreign operation, then the cumulative exchange differences recognised in OCI are reclassified in their entirety to profit or loss. If control is not lost, then a proportionate amount of the cumulative exchange differences recognised in OCI is reclassified to NCI.

If an entity retains neither significant influence nor joint control over a foreign operation that was an associate or joint arrangement, then the cumulative exchange differences recognised in OCI are reclassified in their entirety to profit or loss. If either significant influence or joint control is retained, then a proportionate amount of the cumulative exchange differences recognised in OCI is reclassified to profit or loss.

A foreign currency transaction is measured at the spot rate on initial recognition.

Goodwill and any fair value acquisition accounting adjustments related to the acquisition of a foreign operation are treated as assets and liabilities of the foreign operation and are translated at the closing rate at each reporting date.

An entity may present supplementary financial information in a currency other than its presentation currency if certain disclosures are made.

Like IFRS Accounting Standards, if the functional currency of a foreign operation is hyperinflationary, then current purchasing power adjustments are made to its financial statements prior to translation; the financial statements are then translated at the closing rate at the end of the current period (Chapter 2.12).

Unlike IFRS Accounting Standards, Dutch law (Art. 362.7) sets specific conditions under which the presentation currency may differ from the local currency.

Like IFRS Accounting Standards, an entity may present its financial statements in a currency other than its functional currency. When financial statements are translated into a presentation currency other than the functional currency, the translation procedures are the same as those for translating foreign operations.

Unlike IFRS Accounting Standards, when an investment in a foreign operation is (partially) disposed of, then a proportionate amount of the cumulative exchange differences is recognised in profit or loss.

Like IFRS Accounting Standards, if an equity-method investee that is a foreign entity is disposed of in its entirety, then the exchange differences recognised in equity are reclassified in their entirety to profit or loss. Unlike IFRS Accounting Standards, when an equity method-investment in a foreign operation is (partially) disposed of, then a proportionate amount of the cumulative exchange differences is recognised in profit or loss.

Like IFRS Accounting Standards, a foreign currency transaction is measured at the spot rate on initial recognition.

Unlike IFRS Accounting Standards, Dutch GAAP allows goodwill to be treated as non-monetary items of the acquirer, and therefore recognises no translation differences in that case.

Like IFRS Accounting Standards, an entity may present supplementary financial information in a currency other than its presentation currency if certain disclosures are made.



### Forthcoming requirements

#### Lack of exchangeability

Amendments to the effects of changes in foreign exchange rates standard are effective for annual periods beginning on or after 1 January 2025; early adoption is permitted.

The amendments:

- define exchangeability and specify when there is a lack thereof;
- specify how an entity would estimate the spot exchange rate to be applied in this case; and
- set out the disclosure an entity would provide when exchangeability between two currencies is lacking.

#### References:

IAS 21, IAS 29, IFRIC 22

### Forthcoming requirements

DASB has amended RJ 122.206 to align with the economic fact and circumstances. If two currencies cannot be exchanged directly, the spot exchange rate as of the valuation date should be estimated, rather than based on the next possible exchange opportunity. This estimated exchange rate is more appropriate given the economic conditions on the valuation date. Depending on the specific facts and circumstances, the next available exchange rate may be used. These amendments become effective from 1 January 2025.

Further, DASB has processed some amendments for clarifications.

#### References:

RJ 120, RJ 122



## 2.10 Accounting policies, errors and estimates

IFRS Accounting Standards	Dutch GAAP
Accounting policies are the specific principles, bases, conventions, rules and practices that an entity applies in preparing and presenting financial statements.	Like IFRS Accounting Standards, accounting policies are the specific principles, bases, conventions, rules and practices that an entity applies in preparing and presenting financial statements.
A hierarchy of alternative sources is specified for situations when IFRS Accounting Standards do not cover a particular issue. In developing and applying an accounting policy must use judgement which results in relevant and reliable information and which does not conflict with the Conceptual Framework.	Unlike IFRS Accounting Standards, no hierarchy is specified for situations when Dutch GAAP does not cover a particular issue. Like IFRS Accounting Standards, in developing and applying an accounting policy must use judgement which results in relevant and reliable information and which does not conflict with the Conceptual Framework.
Unless otherwise specifically permitted by an IFRS Accounting Standard, the accounting policies adopted by an entity are applied consistently to all similar items, and accounting policies within a group are consistent for consolidation purposes.	Like IFRS Accounting Standards, the accounting policies adopted by an entity are applied consistently to all similar items and accounting policies within a group are consistent for consolidation purposes.
A change in accounting policy is made when an entity is required to adopt a new or revised standard, or otherwise if a voluntary change will result in reliable and more relevant information.	Like IFRS Accounting Standards, a change in accounting policy is made when an entity is required to adopt a new or revised standard, or otherwise if a voluntary change will result in reliable and more relevant information.
	Unlike IFRS Accounting Standards, a change in accounting policy is made when it is required by law or the RJ, or voluntary, based on justified reasons as listed in the law.

When an entity has not applied a new IFRS Accounting Standard that has been issued but is not yet effective, it discloses this fact as well as the known or reasonable estimable information relevant to assessing the possible impact of the new IFRS Accounting Standards on the entity's financial statements.

Generally, accounting policy changes and corrections of material prior-period errors are made by adjusting opening equity and restating comparatives, unless this is impracticable.

Changes in accounting estimates are accounted for prospectively.

Changes in accounting policies concerning the initial application of current value regarding intangible fixed assets and tangible fixed assets shall be accounted for and disclosed as a revaluation in accordance with IAS 16, respectively IAS 38. This means that such changes in accounting policies cannot be accounted for retrospectively.

If it is difficult to determine whether a change is a change in accounting policy or a change in estimate, then it is treated as a change in estimate.

If the classification or presentation of items is changed, then comparatives are restated unless impracticable.

Unlike IFRS Accounting Standards, it is not required for a new RJ issued but not yet effective (and that has not been applied) to disclose that it has not yet been applied and to disclose the expected impact on the financial statements.

Like IFRS Accounting Standards, generally, accounting policy changes and corrections of material prior-period errors are made by adjusting opening equity and restating comparatives, unless this is impracticable.

Like IFRS Accounting Standards, changes in accounting estimates are accounted for prospectively.

Unlike IFRS Accounting Standards, changes in accounting policies concerning the initial application of current value regarding intangible fixed assets and tangible fixed assets must be accounted for according to the principal rule (retrospectively, including restatement of comparative figures).

Like IFRS Accounting Standards, if it is difficult to determine whether a change is a change in accounting policy or a change in estimate, then it is treated as a change in estimate.

Like IFRS Accounting Standards, if the classification or presentation of items is changed, then comparatives are restated unless impracticable.

A statement of financial position as at the beginning of the earliest comparative period is presented when an entity restates comparative information, following a change in accounting policy, the correction of an error, or reclassification of items in the financial statements.

IFRS has a separate accounting standard (IFRS 1) and provisions for the first-time application of IFRS in the financial statements. IFRS 1 is not designated as a change in accounting policy, but there are many similarities in terms of the (retrospective) accounting method. IFRS 1 has a number of exemptions and exceptions to this retrospective accounting method on the first-time application of IFRS.

IFRS has the requirement to present a balance sheet at the start of the comparative period (the 'third balance sheet') in case of a change in accounting policy or correction of material errors in the financial statements.

Accounting estimates are monetary amounts in the financial statements that are subject to measurement uncertainty. The effects of changes in the measurement techniques or inputs used to develop them are changes in accounting estimates.

**References**  
IAS 1, IAS 8

Like IFRS Accounting Standards, all material errors shall be recognised retrospectively in the first set of financial statements authorised for issue after their discovery. The cumulative effect of the material error is accounted for in opening equity of the comparative year.

Unlike IFRS Accounting Standards, there is no requirement to present a 'third' statement of financial position.

Unlike IFRS Accounting Standards, Dutch GAAP has no similar specific provisions for the first-time application of Dutch accounting rules (Title 9 and RJ) in the financial statements. In our view, this means that in such situations the provisions relating to changes in accounting policies from RJ 140 should be applied by analogy. This will mean retrospective accounting, unless a specific Standard requires or allows otherwise.

Title 9 and the RJ have no comparable requirement to present a 'third balance sheet'.

Like IFRS Accounting Standards, the effects of changes in measurement techniques or inputs used to develop the estimates are considered changes in accounting estimates.

**References:**  
RJ 140, RJ 145, RJ 150

## 2.11 Events after the reporting date

IFRS Accounting Standards	Dutch GAAP
The financial statements are adjusted to reflect events that occur after the reporting date, but before the financial statements are authorised for issue, if those events provide evidence of conditions that existed at the reporting date.	Like IFRS Accounting Standards, the financial statements are adjusted to reflect events that occur after the balance sheet date if those events provide evidence of conditions that existed at the balance sheet date, but before the financial statements are prepared (comparable with: authorised for issue). Unlike IFRS Accounting Standards, these events are also adjusted if these occur between the date of preparation and the date of approval of the financial statements by the annual meeting if they are indispensable ('onontbeerlijk') for the insight that should be given by the financial statements.
Financial statements are not adjusted for events that are a result of conditions that arose after the reporting date, except when the going concern assumption is no longer appropriate.	Like IFRS Accounting Standards, the financial statements generally are not adjusted for events that are indicative of conditions that arose after the balance sheet date, except when the going concern assumption is no longer appropriate.

When the event pertains to a non-adjusting event, the company shall disclose the nature of the event and an estimate of its financial effect, or a statement that an estimate cannot be made.

Detailed information about business combinations effected after the reporting date is disclosed.

The date on which the financial statements were authorised for issuance and who gave such authorisation are disclosed.

The classification of liabilities as current or non-current is based on circumstances at the reporting date.

Dividends declared, proposed or approved after the reporting date are not recognised as a liability in the financial statements.

Subsequent events are reported as part of the notes to the financial statements.

**References:**  
IAS 1, IAS 10

Like IFRS Accounting Standards, Dutch GAAP requires that non-adjusting events, which could influence users' decisions based on the financial statements, must be disclosed. The disclosure requirements are aligned with IFRS standards and include:

- the nature of the event; and
- an estimate of its financial effect, or a statement explaining why such an estimate cannot be made.

Like IFRS Accounting Standards, Dutch GAAP 216.410 requires detailed information about the business combinations effected after the reporting date, unless it is practically not possible.

Like IFRS Accounting Standards, the date on which the financial statements were prepared (authorised for issue) and who gave the authorisation are disclosed.

Unlike IFRS Accounting Standards, the classification of liabilities may reflect post-balance sheet events. Events after the balance sheet date, but before the date that the financial statements are prepared ('authorised for issue'), might be taken into consideration, for example continuance of a non-current liability to be presented as non-current or as current liability at the balance sheet date.

Unlike IFRS Accounting Standards, if a balance sheet is presented after appropriation of profit, there is a choice to present the proposed dividends declared as a separate component of equity or as a liability. If the balance sheet is presented before appropriation of profit, the proposed dividends should not be presented separately in equity (instead, the profit for the year should then be presented as a separate component within equity).

Like IFRS Accounting Standards, subsequent events are reported as part of the notes to the financial statements. Like IFRS Accounting Standards, subsequent events are reported as part of the notes to the financial statements. Unlike IFRS Accounting Standards, the required disclosures concerning events that provide no further information about the actual situation as of the balance sheet date should be included either in the management report or in the notes.

**References:**  
RJ 160, RJ 254



## 2.12 Hyperinflation

IFRS Accounting Standards	Dutch GAAP
<p>IAS 29 <i>Financial Reporting in Hyperinflationary Economies</i> is a specific standard on hyperinflation. This standard contains requirements on how to restate reporting entity's financial statements whose functional currency is the currency of a hyperinflationary economy.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP does not contain any requirements for entities whose functional currency is the currency of a hyperinflationary economy as it was written on the basis that the Netherlands is not a hyperinflationary economy.</p>
<p>Although it is a matter of judgement as to when restatement for hyperinflation becomes necessary, IFRS Accounting Standards provide guidance on the characteristics of a hyperinflationary economy. These characteristics include, but are not limited to, a cumulative inflation rate over three years approaching or exceeding 100 percent.</p>	<p>In addition, specific provisions are included under IFRS Accounting Standards with regard to deferred taxes that are not included in Dutch GAAP.</p>
<p>When an entity's functional currency is hyperinflationary, its financial statements are adjusted to state all items in the measuring unit current at the reporting date.</p>	<p>Unlike IFRS Accounting Standards, if the cumulative inflation rate over three years is or exceeds 100 percent, then the economy is hyperinflationary in any event.</p>
<p>When an entity's functional currency becomes hyperinflationary, it makes price-level adjustments retrospectively as if the economy had always been hyperinflationary.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP does not contain specific requirements for the financial statements of an entity whose functional currency is the currency of a hyperinflationary economy. However, based on the requirements on translation in the presentation currency in the event of hyperinflation of a foreign operation, like IFRS Accounting Standards, when a foreign operation's functional currency is hyperinflationary, its financial statements are adjusted to state all items in the measuring unit current at the reporting date.</p>
<p>Comparative amounts of an entity whose functional and presentation currency are hyperinflationary are also stated in terms of the measuring unit current at the reporting date. However, comparative amounts are not restated if the presentation currency is non-hyperinflationary.</p>	<p>Unlike IFRS Accounting Standards, when a foreign operation's functional currency becomes hyperinflationary, it may make price-level adjustments retrospectively as if the economy had always been hyperinflationary. Dutch GAAP also includes an accounting policy under which non-monetary items will be translated at the start of the financial year for the effect of the (hyper)inflation from the start of the financial year in which the criteria for hyperinflation are first met (therefore, the financial year will start with an index of 100 percent).</p>
<p>In adjusting for hyperinflation, a general price index is applied to all non-monetary items in the financial statements (including components of owners' equity). Monetary items in the closing statement of financial position, which are defined as money held and items to be received or paid in money, are not adjusted because they are already expressed in purchasing power at that date. The gain or loss on the entity's net monetary position – reflecting the change in purchasing power of monetary items – is recognised in profit or loss and disclosed separately.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP does not contain specific guidance on how to present comparative amounts when both a foreign operation's functional and the reporting entity's presentation currency are hyperinflationary.</p>
<p>Like under IFRS Accounting Standards, when translating the results and financial position of a foreign operation whose functional currency is hyperinflationary, the resultant positive or negative result on the net monetary position is recognised in profit or loss and quantified separately.</p>	<p>Like under IFRS Accounting Standards, when translating the results and financial position of a foreign operation whose functional currency is hyperinflationary, the resultant positive or negative result on the net monetary position is recognised in profit or loss and quantified separately.</p>

Non-monetary items are adjusted from the date of acquisition or contribution. However, if an asset has been revalued, then it is adjusted from the date of the valuation; if the item is stated at fair value at the reporting date, then no adjustment is necessary.

The financial statements of a foreign operation whose functional currency is hyperinflationary are adjusted before being translated and included in the investor's consolidated financial statements.

When an economy ceases to be hyperinflationary, an entity stops preparing its financial statements in accordance with the accounting standard on financial reporting in hyperinflationary economies.

The amounts expressed in the measuring unit current at the end of the last reporting period in which IAS 29 was applied are used as the basis for the carrying amounts in subsequent financial statements. Judgement is required in determining when the economy ceases to be hyperinflationary.

**References**  
IAS 21, IAS 29, IFRIC 7

Unlike IFRS Accounting Standards, when the criteria for hyperinflation are first met, the assets and liabilities of the foreign operation may initially be translated in two ways:

- non-monetary items are translated at the beginning of the reporting period for the effect of inflation from the dates on which the assets were acquired and the liabilities were entered into. The difference with the previous measurement is recognised in equity; or
- non-monetary items are translated at the beginning of the reporting period for the effect of inflation from the beginning of the reporting period in which the criteria for hyperinflation are first met (i.e. starting from the beginning of the reporting period with an index of 100%).

The results and financial position of a foreign operation whose functional currency is the currency of a hyperinflationary country shall be translated into the presentation currency using the following procedures:

- balance sheet items and items in the profit and loss account shall be expressed in purchasing power units of the legal entity's functional currency at the reporting date in order to reflect the effects of price increases. The resultant positive or negative result on the net monetary position shall be recognised in the profit and loss account and quantified separately;
- the restated results and financial position are then translated into the legal entity's presentation currency at the exchange rate at the reporting date. The translation differences arising from this are recognised directly in equity;
- the comparative figures shall be the figures presented or the reporting period in the financial statements of the previous period (i.e. the comparative figures, if prepared in the presentation currency of a country without hyperinflation, are not restated for price changes or subsequent exchange rate movements during the reporting period).

Like IFRS Accounting Standards, when an economy ceases to be hyperinflationary, a foreign operation stops restating its results and financial position in accordance with the accounting requirements on hyperinflation.

Like IFRS Accounting Standards, the values restated for inflation, from the date when there is no further hyperinflation, are regarded as historic cost for subsequent translation of the foreign operation's financial statements.

**References:**  
RJ 122

# 3 Statement of financial position

## 3.1 Property, plant and equipment

IFRS Accounting Standards	Dutch GAAP
Property, plant and equipment is initially recognised at cost.	Like IFRS Accounting Standards, property, plant and equipment is recognised initially at cost.
Cost includes all expenditure that is directly attributable to bringing the asset to the location and working condition for its intended use.	Like IFRS Accounting Standards, cost includes all expenditure directly attributable to bringing the asset to the location and working condition for its intended use.
The revenues and associated costs from the sale of goods produced (such as the sale of samples produced during the testing phase) by a tangible fixed asset that is not yet in the location and condition for intended use, are recognised in the profit and loss account.	Unlike IFRS Accounting Standards, there is an alternative that allows to offset such revenues from sales and associated costs against the cost of the asset as long as the asset is not in place and in the condition necessary for its intended use.
Borrowing costs (interest cost) that are directly attributable to the acquisition, construction or production of a qualifying asset form part of the cost of that asset.	Unlike IFRS Accounting Standards, interest (borrowing costs) that is directly attributable to the acquisition, construction or production of a qualifying asset may form part of the cost of that asset.
Cost includes the estimated cost of dismantling and removing the asset and restoring the site.	The estimated cost of dismantling and removing the asset and restoring the site may, like IFRS Accounting Standards, (a) be recognised as part of the carrying amount of the asset or unlike IFRS Accounting Standards, (b) be recognised through a provision over the useful life of the asset, with a corresponding expense recognised in profit or loss.
Changes to an existing decommissioning or restoration obligation are generally adjusted against the cost of the related property, plant and equipment.	Like IFRS Accounting Standards, changes to an existing decommissioning or restoration obligation are added to or deducted from the cost of the related asset and depreciated prospectively over the asset's remaining useful life. However, unlike IFRS Accounting Standards, if such costs are recognised by building up a provision, then any changes are recognised prospectively in the provision over the asset's remaining useful life.
If payment is deferred beyond normal credit terms, then the cost of the asset is the cash price equivalent (i.e. current cash price) at the date of recognition, which may be different from the cash flows discounted using a market rate of interest.	Unlike IFRS Accounting Standards, if the cost of a tangible fixed asset is paid based on a payment term longer than usual, the cost of the asset shall be based on the present value of the obligation and not on the current cash price.
Property, plant and equipment is depreciated over its expected useful life.	Like IFRS Accounting Standards, property, plant and equipment is depreciated over its useful life.

An entity continues to recognise depreciation even when an asset is idle, unless the asset is fully depreciated or is classified as held for sale.

Estimates of the useful life and residual value, and method of depreciation are reviewed as a minimum at each annual reporting date. Any changes are accounted for prospectively as a change in accounting estimate.

If an item of property, plant and equipment comprises individual components for which different depreciation methods or rates are appropriate, then each component is depreciated separately (component accounting).

Routine maintenance costs are expensed as they are incurred.

Major inspection or overhaul costs are accounted for as a separate component of the item of property, plant and equipment if that component is used over more than one period. In our view, the cost of a major inspection or overhaul includes internal as well as external costs, and there is no requirement for the costs to be incremental.

The remaining carrying amount of a component that is replaced by a new component is derecognised.

Expenditure incurred subsequent to the initial recognition of property, plant and equipment is capitalised only when it is probable that future economic benefits associated with the item will flow to the entity, or when it replaces a component that is accounted for separately. Expenditure associated with the day-to-day services of assets is expensed as it is incurred.

Property, plant and equipment may be revalued to fair value, as an accounting policy choice, if fair value can be measured reliably. All items in the same class are revalued at the same time and the revaluations are kept up to date.

Compensation for loss or impairment cannot be offset against the carrying amount of the asset lost or impaired.

Like IFRS Accounting Standards, an item of property, plant and equipment is depreciated even if it is idle. Although, unlike IFRS Accounting Standards, Dutch GAAP does not include a specific standard for non-current assets held for sale. Retired tangible fixed assets should be valued at cost or lower net realisable value or if it is decided to sell the asset at net realisable value (as under IFRS Accounting Standards). In that case depreciation is ceased (chapter 5.4).

Unlike IFRS Accounting Standards, the useful lives, residual values or methods of depreciation are reassessed only if there is an indication of change to circumstances or new information concerning the remaining economic life and/or residual value. Like IFRS Accounting Standards, any changes are accounted for prospectively as a change in accounting estimate.

Like IFRS Accounting Standards, when an item of property, plant and equipment comprises individual components for which different depreciation methods or rates are appropriate, each component is depreciated separately.

Like IFRS Accounting Standards, routine maintenance cost are expenses as they are incurred.

Unlike IFRS Accounting Standards, it is also allowed to recognise expenses for periodic major maintenance (a) by accruing a provision or (b), like IFRS Accounting Standards, by applying the component approach of property, plant and equipment.

Like IFRS Accounting Standards, Dutch GAAP requires the remaining carrying amount of an asset (or component) to be derecognised.

Like IFRS Accounting Standards, subsequent expenditure is capitalised only if it meets the general recognition criteria, i.e. when it is probable that future economic benefits will flow to the entity and the cost of the item can be measured reliably. Like IFRS Accounting Standards, costs of the day-to-day servicing of property, plant and equipment are recognised in profit or loss as they are incurred.

Unlike IFRS Accounting Standards, property, plant and equipment may be revalued to current cost (or recoverable amount, when lower). Like IFRS Accounting Standards, in substance the same guidance is applicable with respect to the frequency and timing of revaluations.

Like IFRS Accounting Standards, compensation for loss or impairment cannot be offset against the carrying amount of the asset lost or impaired.



Non-monetary exchanges with non-customers do not give rise to revenue. If a non-monetary exchange of assets with a non-customer has commercial substance, then the transaction gives rise to a gain or loss. The cost of the asset acquired is generally the fair value of the asset surrendered, adjusted for any cash transferred.

If an entity enters into a non-monetary exchange of goods or services with a customer as part of its ordinary activities, then it applies the guidance on non-cash consideration in the revenue standard (chapter 4.1). Sometimes a customer transfers property, plant and equipment to an entity that will use the contributed assets to connect the customer to a network or provide it with ongoing services. If the entity obtains control of the contributed assets, then the assets are recognised initially following the guidance on non-cash consideration in the revenue standard (chapter 4.1).

Donated assets may be accounted for in a manner similar to government grants (chapter 4.2) unless the transfer is, in substance, an equity contribution.

When property, plant and equipment is disposed of or no future economic benefits are expected from its use or disposal, a gain or loss is recognised. If the asset is disposed of as a part of a sale-and-leaseback transaction, then the requirements in the lease standard apply (chapter 5.1).

Compensation for the loss or impairment of property, plant and equipment is recognised in profit or loss when it becomes receivable.

IAS 16 refers to land, buildings and machines ('property, plant and equipment'), but does not impose a mandatory structure. In addition, under IAS 16 the advance payments on property, plant and equipment will not be part of property, plant and equipment, but will in principle be presented under current assets as prepayments.

**References:**  
IAS 16, IAS 23, IFRIC 1, IFRS 15

Unlike IFRS Accounting Standards, there is no guidance on exchanges of assets other than on (in)tangible fixed assets.

If a(n) (in)tangible fixed asset is acquired in exchange for a non-monetary asset, the cost of such a (in)tangible fixed asset shall be based on the fair value, but exclusively insofar:

- a) the barter transaction results in a change in the economic circumstances; and
  - b) the fair value of the acquired asset or the bartered asset can be reliably estimated.
- If the acquired fixed asset is not stated at fair value, the cost is equivalent to the book value of the bartered asset.

Like IFRS Accounting Standards, property, plant and equipment contributed from customers that is used to provide access to a supply of goods or services is recognised as an asset if it meets the definition of an asset and the recognition criteria for property, plant and equipment.

Like IFRS Accounting Standards, donated assets may be accounted for in a manner similar to government grants unless the transfer is, in substance, an equity contribution.

Like IFRS Accounting Standards, the gain or loss on disposal is the difference between the net revenue upon disposal and the carrying amount of the asset.

Unlike IFRS Accounting Standards, compensation for the loss or impairment of property, plant and equipment is recognised in profit or loss when it is probable that the compensation will be received.

Unlike IFRS Accounting Standards, Dutch law sets out that the item tangible fixed assets must be specified into categories (amongst which the category 'tangible fixed operating assets under construction and advance payments on tangible fixed assets').

**References:**  
Current Value Decree (Besluit actuele waarde), DCC, RJ 212, RJ 273

### 3.2 Intangible assets and goodwill

IFRS Accounting Standards	Dutch GAAP
An 'intangible asset' is an identifiable non-monetary asset without physical substance.	Like IFRS Accounting Standards, an 'intangible asset' is an identifiable non-monetary asset without physical substance.
An intangible asset is 'identifiable' if it is separable or arises from contractual or other legal rights, irrespective if these rights are separable.	Unlike IFRS Accounting Standards, an intangible fixed asset is identifiable if it can be separated or can be identified in another way.
For an item to be recognised as an intangible asset, it must have future economic benefits that likely will flow to the company and its cost can be reliably measured.	Like IFRS Accounting Standards, for an item to be recognised as an intangible asset, it must have expected economic benefits that likely will flow to the company and its cost can be reliably measured.
If an intangible asset is acquired in a business combination, then these criteria are assumed to be met. If an intangible asset is acquired in a separate acquisition (i.e. outside a business combination), then the 'probability' criterion is assumed to be met and the 'reliable measurement' criterion is usually met.	Unlike IFRS Accounting Standards, the recognition criteria for intangible assets are the same whether they have been acquired separately, acquired as part of a business combination or were generated internally.
In general, intangible assets are recognised initially at cost.	Like IFRS Accounting Standards, in general, intangible assets are recognised initially at cost.
The initial measurement of an intangible asset depends on whether it has been acquired separately or as part of a business combination, or whether it was internally generated.	Like IFRS Accounting Standards, the initial measurement of an intangible asset depends on whether it has been acquired separately or as part of a business combination, or whether it was internally generated.
Goodwill is measured as the excess of the cost of an acquired entity over the fair value of the identifiable assets acquired and liabilities assumed.	Like IFRS Accounting Standards, goodwill is measured as the excess of the cost of an acquired entity over the fair value of the identifiable assets acquired and liabilities assumed.
Goodwill represents future economic benefits arising from assets that are not capable of being identified individually and recognised separately.	Like IFRS Accounting Standards, goodwill represents future economic benefits arising from assets that are not capable of being identified individually and recognised separately.
Internal research expenditure is expensed as it is incurred. Internal development expenditure is capitalised if specific criteria are met. These capitalisation criteria are applied to all internally developed intangible assets.	Like IFRS Accounting Standards, internal research expenditure is expensed as it is incurred. Like IFRS Accounting Standards, internal development expenditure is capitalised if specific criteria are met, and these criteria are applied to all internally developed intangible assets.
For the measurement after initial recognition, an entity shall choose either the cost model or the revaluation model (fair value).	Unlike IFRS Accounting Standards, intangible assets may be subsequently measured at cost or revalued to current cost (or recoverable amount, when lower). The recoverable amount is the highest of the value in use or net realisable value.
Intangible assets may be revalued to fair value only if there is an active market.	Like IFRS Accounting Standards, intangible assets may be revalued to current cost (or recoverable amount, when lower) only if there is an active market.

Acquired goodwill, intangible assets that have not yet been taken into use and other intangible assets with indefinite lives are not amortised, but instead are subject to impairment testing at least annually.

The amortisation of intangible assets with finite useful lives begins when the intangible asset is available for use and ceases at the earlier on the date when the asset is classified as held for sale or derecognised.

An intangible asset with a finite life is amortised on a systematic basis over its expected useful life. If the pattern cannot be determined reliably, the straight-line method is used. Generally, the residual value of an intangible asset is assumed to be zero.

The method of amortisation, useful life and residual value are reviewed each annual reporting period.

Subsequent expenditure on an intangible asset is capitalised only if the definition of an intangible asset and the recognition criteria are met.

In-process research and development (R&D) acquired in a business combination is accounted for under specific guidance.

Expenditure related to the following is expensed as it is incurred: internally generated goodwill, research costs, customer lists, start-up costs, training costs, advertising and promotional activities, and relocation or reorganisation, and incorporation and issuing shares.

An intangible fixed asset shall no longer be recognised on the balance sheet if no future economic benefits are expected. Any profits or losses that arise due to decommissioning or disposal of an intangible fixed asset shall be measured as the difference between the net revenue and the book value.

Unlike IFRS Accounting Standards, goodwill recognised on the balance sheet and all other intangible assets are assumed to have finite useful lives. There is a rebuttable presumption that the useful life is no longer than 20 years.

Unlike IFRS Accounting Standards, annual impairment testing is only required for intangible assets that have not yet been taken into use and intangible assets with useful lives of longer than 20 years. For other intangible assets, impairment testing is only required in case of (an) impairment indicator(s) at the reporting date.

Like IFRS Accounting Standards, the amortisation of intangible assets with finite useful lives begins when the intangible asset is available for use and ceases at the earlier on the date when the asset is classified as held for sale or derecognised.

Like IFRS Accounting Standards, intangible assets are amortised over their expected useful lives, usually on a straight-line basis. Like IFRS Accounting Standards, generally the residual value of an intangible asset is assumed to be zero.

Like IFRS Accounting Standards, at least once a year, at the end of each financial year, the company must check to what extent the amortisation method and amortisation period are still acceptable.

Like IFRS Accounting Standards, subsequent expenditure on an intangible asset is capitalised only if the definition of an intangible asset and the recognition criteria are met.

Unlike IFRS Accounting Standards, in-process research and development (R&D) acquired in a business combination is recognised (and measured initially at fair value) only when the general criteria for capitalisation of intangible fixed assets are met.

Like IFRS Accounting Standards, internally generated goodwill, research costs, customer lists, start-up costs, and expenditure incurred on training, advertising and promotional activities, or on relocation or reorganisation, are not allowed to be recognised on the balance sheet.

Unlike IFRS Accounting Standards, costs of incorporation and issuing shares may be capitalised as an intangible fixed asset, although the DASB recommends not to capitalise such costs. RJ DCC requires the recognition of a legal reserve for the carrying amount of capitalised costs.

Like IFRS Accounting Standards, an intangible fixed asset shall no longer be recognised on the balance sheet if no future economic benefits are expected. Any profits or losses that arise due to decommissioning or disposal of an intangible fixed asset shall be measured as the difference between the net revenue and the book value.

There is no specific guidance in IFRS Accounting Standards on the accounting for emission allowances. In our view, a participant in a mandatory 'cap-and-trade' scheme should choose an accounting policy, to be applied consistently, to account for emission allowances regardless of whether they are bought or received from a government, as intangible assets or as inventories.

If an entity receives emission allowances from a government, then it may apply the guidance for government grants.

An entity entering into a cloud computing arrangement assesses whether it receives a software asset or a service over the contract term. It receives a software asset if:

- the arrangement contains a software lease under the guidance in the leases standard; or
- it otherwise obtains control of the software under the guidance in the intangible assets standard.

Cloud computing arrangements generally do not meet the definition of a lease. In our experience, they usually also do not give rise to an intangible asset, except in some limited circumstances. In our view, features of a cloud computing arrangement that may indicate that the entity obtains control of a software intangible asset include:

- the right to take possession of the software and run it on the entity's own or a third party's computer infrastructure; or
- exclusive rights to use the software or ownership of the intellectual property for customised software (i.e. the vendor cannot make the software available to other customers).

According to the IFRIC update of March 2021, an entity entering into a cloud computing arrangement assesses whether it receives a software asset or a service over the contract term. If an entity determines that a cloud computing arrangement is a service contract, then it recognises the related expenditure when it receives the service – i.e. over the contract term.

Any configuration and customisation of cloud computing arrangement conducted by the entity, will only be capitalised when the entity receives an asset after the cloud computing arrangement. When receiving a service, the cost for configuration and customisation will be expensed as incurred, because the entity does not control the asset.

**References:**  
IFRS 3, IAS 38, SIC-32, IFRIC Publication March 2021

Unlike IFRS Accounting Standards, the RJ 274 Annex contains guidance on the accounting for emission rights including those received for no consideration from the government for own use. This Annex sets out two variants for the treatment of these emission rights and the associated obligations.

Unlike IFRS Accounting Standards, DASB does not provide additional guidance for costs incurred for customisation and configuration of Cloud computing arrangements. Therefore, the general recognition criteria for assets will apply. This may result in differences, especially in case of receiving a service.

**References:**  
RJ 210, RJ 216



### 3.3 Investment property

IFRS Accounting Standards	Dutch GAAP
Investment property is property (land or building) held by the owner or lessee to earn rental income or for capital appreciation or both.	Like IFRS Accounting Standards, investment property is property held to earn rentals or for capital appreciation or both.
If a lessor provides ancillary services, and such services are a relatively insignificant component of the arrangement as a whole, then the property is classified as investment property.	Like IFRS Accounting Standards, if additional services are a relatively insignificant component, the property can be classified as an investment property.
Investment property accounting is required for all investment properties.	While (generally speaking) investment property accounting is required for all investment properties, unlike IFRS Accounting Standards, for certain industries, specific standards prevail over this standard, e.g. RJ 645 <i>Licensed public sector housing institutions</i> . These specific standards, however, fall outside the scope of this publication.
A right-of-use asset held by a lessee is classified as an investment property if the underlying asset would otherwise meet the definition of investment property.	Unlike IFRS Accounting Standards, a right of use in a property that classifies as operating lease for a lessee (for example land in leasehold) can be recorded by the lessee as an investment property if, and insofar, this right of use regarding this property fulfils the definition of an investment property and the lessee applies the current value as the measurement basis.
A portion of a dual-use property is classified as investment property only if the portion could be sold or leased out under a finance lease. Otherwise, the entire property is classified as property, plant and equipment, unless the portion of the property used for own use is insignificant.	Like IFRS Accounting Standards, a portion of a dual-use property is classified as investment property only if the portion could be sold or leased out under a finance lease. Otherwise, the entire property is classified as property, plant and equipment, unless the portion of the property used for own use is insignificant.
Subsequent expenditure is capitalised only if it is probable that it will give rise to future economic benefits, including when the costs are for replacing a component of the item.	Like IFRS Accounting Standards, subsequent expenditure is capitalised only when it is probable that future economic benefits will flow to the entity, including when the costs are for replacing a component of the item.
Investment property is, in general, initially measured at cost. An investment property held by a lessee as a right-of-use-asset is measured at cost in accordance with the lease standard (IFRS 16), unless it is held for sale.	Like IFRS Accounting Standards, investment property is recognised initially at cost. Unlike IFRS Accounting Standards, the initial measurement of leases classified as investment property is accounted for as a finance lease in accordance with the lease standard (RJ 292), i.e. the property is measured at the lower of the fair value of the property or the present value of the minimum lease payments.
Subsequent to initial recognition, all investment properties are measured under either the fair value model (subject to limited exceptions) or the cost model in IAS 16 Property, Plant and Equipment.	Like IFRS Accounting Standards, subsequent to initial recognition, all investment properties should be measured using either the current (in effect fair) value model (subject to limited exceptions) or the cost model in RJ 212 <i>Tangible fixed assets</i> .
	Unlike IFRS Accounting Standards, for all operating leases that are classified as investment property the fair value model is required.

If the fair value model is chosen, changes in fair value are recognised in profit or loss.	Unlike IFRS Accounting Standards, when the fair value model is chosen and changes in fair value are recognised in profit or loss, a revaluation reserve (which is a legal non-distributable reserve) shall be recognised for unrealised increases in fair value, either via an appropriation of results or directly from other reserves (freely distributable reserves).
Disclosure of the fair value of all investment properties is required, regardless of the measurement model used.	Like IFRS Accounting Standards, disclosure of the fair value of all investment properties is required, regardless of the measurement model used.
Transfers to or from an investment property are made only when there has been a change in use of the property. A change in management's intention alone does not provide such evidence.	Like IFRS Accounting Standards, transfers to or from an investment property can be made only when there is evidence of change in the use of the property. A change in management's intention alone does not provide such evidence.
The gain or loss on disposal is the difference between the net disposal proceeds and the carrying amount of the property.	Like IFRS Accounting Standards, the gain or loss on disposal is the difference between the net disposal proceeds and the carrying amount of the property.
If investment properties measured at historical cost meet the 'held for sale' criteria, no further depreciation is required. Instead, the entity shall switch to measurement at the (frozen) book value or net realisable value if lower ('fair value less costs to sell').	Unlike IFRS Accounting Standards, there are no specific rules for depreciating an investment property that meets the 'held for sale' criteria. As a result, the investment property continues to be depreciated until it is actually derecognised.
<b>References:</b> IAS 40, IAS 16	<b>References:</b> RJ 213, RJ 212, DCC

### 3.4 Investments in associates and the equity method

IFRS Accounting Standards	Dutch GAAP
The definition of an associate is based on 'significant influence', which is the power to participate in the financial and operating policies of an entity but is not control or joint control of those policies.	Unlike IFRS Accounting Standards, no equivalent term exists for 'associate'; rather, 'a participating interest ('deelnemings') with significant influence' would be equivalent. Like IFRS Accounting Standards, significant influence is the power to participate in the financial and operating policies of an entity.
There is a rebuttable presumption of significant influence if an entity holds 20 percent or more of the voting rights of another entity in which it does not have control.	Like IFRS Accounting Standards, there is a rebuttable presumption of significant influence if an entity holds 20 percent or more of the voting rights in another entity in which it does not have control.
In determining applicability of the equity method, there are no special requirements for partnerships and similar entities.	Like IFRS Accounting Standards, there are no special requirements for partnerships and similar entities.

Potential voting rights that are currently exercisable are considered in assessing significant influence. Management intentions with respect to the exercise of potential voting rights are ignored in assessing significant influence. The exercise price of potential voting rights, and the financial capability of the holder to exercise them, are also ignored.

Associates are accounted for using the equity method in the consolidated financial statements. The initial recognition is at cost including goodwill.

Subsequently, the carrying amount is increased or decreased to recognise the investor's share of the profit or loss of the investee after the date of acquisition.

On the date of acquisition of an equity-accounted investee, fair values are determined for the investee's identifiable assets and liabilities as if the transaction were the acquisition of a subsidiary.

Venture capital organisations, mutual funds, unit trusts and similar entities may elect not to apply the equity method for investments in associates and joint ventures and instead account for these investments as financial instruments at fair value on an investment-by-investment basis. In addition, investment entities measure their investments in associates and joint ventures at fair value.

Equity accounting is not applied to investees that are classified as held for sale (chapter 5.4).

In applying the equity method, an associate's accounting policies should be consistent with those of the investor.

The annual reporting date of an equity-accounted investee may not differ from the investor's by more than three months and should be consistent from period to period. Adjustments are made for the effects of significant events and transactions between the two dates.

Unlike IFRS Accounting Standards, when assessing significant influence, all facts and circumstances including contractual arrangements must be taken into account. If potential voting rights exist, the entity should assess if these could be exercised to such extent that they increase or decrease the legal entity's influence in the participating entity. All facts and circumstances must be taken into account, including – but not limited to – economic or other impediments to the holder/holders to exercising the rights and the possibility of the holder/holders to benefit from exercising the rights.

Like IFRS Accounting Standards, participating interests with significant influence are accounted for using the net equity value method (equity method) in the consolidated financial statements. Unlike IFRS Accounting Standards, initial recognition is at cost excluding goodwill (goodwill is presented separately under intangible fixed assets).

Like IFRS Accounting Standards, subsequently, the carrying amount is increased or decreased to recognise the investor's share of the profit or loss of the investee after the date of acquisition.

Like IFRS Accounting Standards, on the date of acquisition of an equity-accounted investee, fair values are determined for the investee's identifiable assets and liabilities as if the transaction were the acquisition of a subsidiary.

Unlike IFRS Accounting Standards, capital interests (participations) held by venture capital organisations and similar entities are classified as other securities (financial instruments) and measured at cost or current value.

Unlike IFRS Accounting Standards, there is no specific guidance on accounting for investees that are held for sale. This means that the general measurement and presentation rules for investments in associates have to be applied.

Like IFRS Accounting Standards, in applying the net equity value method, an associate's accounting policies should be consistent with those of the investor. However, unlike IFRS Accounting Standards, in exceptional circumstances an entity is allowed to account for its interest according to the equity as presented in the financial statements of the participating interest.

Like IFRS Accounting Standards, the reporting date of an associate may not differ from the investor's by more than three months and should be consistent from period to period.

When an equity-accounted investee incurs losses, the carrying amount of the investor's interest is reduced, but not below zero. A liability for further losses is recognised by the investor only to the extent that the investor has an obligation to fund losses or has made payments on behalf of the investee.

When recognising its share of losses, an investor considers not only equity investments but also other long-term interests that in substance form part of the investor's net investment in the associate. Interests to be considered do not include trade receivables, trade payables or any long-term receivables for which adequate collateral exists (e.g. secured loans).

An investor applies the financial instruments standards to long-term interests in an associate or joint venture that are not accounted for under the equity method. The investor does so before applying the loss absorption and impairment requirements of the standard on investments in associates and joint ventures.

Unrealised profits and losses on transactions with equity-accounted investees are eliminated to the extent of the investor's interest in the investee.

In our view, if an entity sells or contributes a controlling interest in a subsidiary in exchange for an interest in an equity-accounted investee, then the entity may choose either to recognise the gain or loss in full or to eliminate the gain or loss to the extent of the investor's retained interest in the former subsidiary.

The carrying amount of an equity-accounted investee is written down if it is impaired.

On the loss of significant influence or joint control, the fair value of any retained investment is taken into account to calculate the gain or loss on the transaction, as if the investment were fully disposed of; this gain or loss is recognised in profit or loss. Amounts recognised in other comprehensive income (OCI) are reclassified or transferred as required by other IFRS Accounting Standards.

When an investment becomes an equity-accounted investee from no significant influence to significant influence, in our view the investor may either remeasure the previously held interest to Fair Value through Profit or Loss ('FVTPL') or add the newly incurred additional cost to the cost of the previously held investment.

Like IFRS Accounting Standards, when a participating interest accounted for under the asset value method incurs losses, the carrying amount of the investor's interest is reduced, but not below zero. At that point, a liability for further losses is recognised by the investor only to the extent that the investor has an obligation to fund losses.

Like IFRS Accounting Standards, when recognising its share of losses, an investor considers not only equity investments but also other long-term interests that form part of the investor's net investment in the participating interest. Interests to be considered do not include trade receivables, trade payables or any long-term receivables for which adequate collateral exists (e.g. secured loans).

Like IFRS Accounting Standards, an investor applies the financial instruments standards to long-term interests in an associate or joint venture that are not accounted for under the equity method. The investor does so before applying the loss absorption and impairment requirements of the standard on investments in associates and joint ventures.

Like IFRS Accounting Standards, unrealised profits and losses on transactions with equity-accounted investees are eliminated to the extent of the investor's interest in the investee.

Like IFRS Accounting Standards, there is no specific guidance. Generally, on the loss of control of a subsidiary, the retained interest is not remeasured at fair value. The gain or loss on disposal to be recognised in profit or loss is determined on the basis of a proportion of the carrying amount that is sold.

Like IFRS Accounting Standards, the carrying amount of a participating interest is written down if it is impaired.

Unlike IFRS Accounting Standards, on the loss of significant influence, the most recent net equity value of any retained investment is the basis for the subsequent measurement of that retained investment at cost or fair value. The cost price or fair value is increased with a proportionate part of the goodwill relating to the remaining interest in the participating interest. Like IFRS Accounting Standards, amounts recognised in other comprehensive income (OCI) are reclassified or transferred as required by other standards.

Unlike IFRS Accounting Standards, when an investment becomes an equity-accounted investee from no significant influence to significant influence, in our view the newly incurred additional cost is required to be added to the carrying amount of the previously held interest, and the equity method is applied from that date.





In our view, an increase in holding should be accounted for using an allocation approach, whereby only the incremental investment is measured at fair value.

In our view, a decrease in holding (while continuing to apply equity accounting) results in the recognition of a gain or loss in profit or loss. The retained interest should not be remeasured.

If an entity's ownership interest in an equity-accounted investee is reduced, but the entity continues to apply equity accounting, then in our view the difference between the proceeds from the sale and the cost of the investment sold should be recognised in profit or loss.

An increase in holding is accounted for using the 'step-by-step' method, whereby the existing investment remains at its existing carrying amount, like IFRS Accounting Standards.

Like IFRS Accounting Standards, a decrease in holding (while continuing to apply equity accounting) results in the recognition of a gain or loss in profit and loss. The retained interest should not be remeasured.

Like IFRS Accounting Standards, if an entity's ownership interest in an equity-accounted investee reduces, but the entity continues to apply equity accounting, the differences between the proceeds from the sale and the equity-accounted interest sold, should be recognised in profit and loss.

If the goodwill paid in the past was capitalised, followed by amortisation over the estimated term of use, the goodwill still capitalised at the time of subsequent divestment of the participating interest must be derecognised and charged to the sales result upon divestment. If only part of the participating interest is divested, a proportionate part of the capitalised goodwill should be reversed.

**References:**  
IAS27, IAS 28, IFRS 5, IFRS 9, IFRS 11

**References:**  
RJ 214, RJ 216, RJ 260, RJ 290, DCC

### 3.5 Joint arrangements

IFRS Accounting Standards	Dutch GAAP
<p>A joint arrangement is an arrangement over which two or more parties have joint control. There are two types of joint arrangements: a joint operation and a joint venture.</p> <p>In a joint operation, the parties to the arrangement have rights to the assets and obligations for the liabilities, related to the arrangement. A joint arrangement not structured through a separate vehicle is a joint operation.</p> <p>In a joint venture, the parties to the arrangement have rights to the net assets of the arrangement.</p> <p>A joint arrangement structured through a separate vehicle may be either a joint operation or a joint venture. Classification depends on the legal form of the vehicle, contractual arrangements and other facts and circumstances.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP uses the term 'joint venture' which in substance is the same as a joint arrangement under IFRS Accounting Standards. A joint venture is defined as an entity, asset or operation that is subject to contractually established joint control.</p> <p>Unlike IFRS Accounting Standards, joint ventures should be classified in one of the following categories:</p> <ul style="list-style-type: none"> <li>• Jointly controlled operations</li> <li>• Jointly controlled assets</li> <li>• Jointly controlled entities</li> </ul> <p>Unlike IFRS Accounting Standards, classification as a joint venture is independent if the arrangement is structured through a separate vehicle or not.</p>

Generally, a joint venture accounts for its interest in a joint venture under the equity method.

Unlike IFRS Accounting Standards, the structure of the joint venture ('joint arrangement') – whether or not in the form of a separate vehicle/entity – is the main factor in determining the accounting under Dutch GAAP.

Unlike IFRS Accounting Standards, separate vehicles at which the separation is overcome by form, contract or other facts and circumstances, fall in the category 'jointly controlled entities'. Therefore, unlike IFRS Accounting Standards, these vehicles/entities may be accounted for either using the net equity value method or by proportionate consolidation.

Jointly controlled entities may be accounted for either by proportionate consolidation or by using the net equity value method.

Like IFRS Accounting Standards, jointly controlled operations and assets are 'line-by-line' accounted for its share in the assets, liabilities and transactions, including its share in those arising jointly.

In relation to its involvement in a joint operation, a joint operator recognises its assets, liabilities and transactions, including its share in those arising jointly ('line-by-line' accounting). The joint operator accounts for each item in accordance with the relevant IFRS Standard.

For each joint venture and associate that is material to the reporting entity, an entity shall disclose:

- (a) dividends received from the joint venture or associate;
- (b) summarised financial information for the joint venture or associate (see paragraphs B14 and B15) including, but not necessarily limited to:
  - (i) current assets;
  - (ii) non-current assets;
  - (iii) current liabilities;
  - (iv) non-current liabilities;
  - (v) revenue;
  - (vi) profit or loss from continuing operations;
  - (vii) post-tax profit or loss from discontinued operations;
  - (viii) other comprehensive income;
  - (ix) total comprehensive income.

Unlike IFRS Accounting Standards, Dutch GAAP does not have such extensive disclosure requirements.

**References:**  
IFRS 11, IFRS, 12, IAS 28

**References:**  
RJ 214, RJ 215, RJ 217

### 3.6 Inventories

IFRS Accounting Standards	Dutch GAAP
Inventories generally are measured at the lower of cost and net realisable value.	Like IFRS Accounting Standards, inventory is measured at the lower of cost and net realisable value.
Cost includes all direct expenditure to get inventory ready to its present location and condition for sale, including attributable overheads. Borrowing costs are capitalised on inventory that is a qualifying asset.	Like IFRS Accounting Standards, cost includes all direct expenditure to get inventory ready for sale. However, unlike IFRS Accounting Standards, it is permitted but not mandatory to include attributable overhead, borrowing costs and indirect production costs in the cost of inventories.
Decommissioning and restoration costs incurred through the production of inventory are included in the cost of that inventory.	Like IFRS Accounting Standards, decommissioning and restoration costs incurred through the production of inventory are included in the cost of that inventory.
The cost of inventory is recognised as an expense when the inventory is sold.	Like IFRS Accounting Standards, the cost of inventory is recognised as an expense when the inventory is sold.
The amount to recognise as an expense is generally determined using the specific identification, FIFO (first in, first out) or weighted average cost method. The use of the LIFO (last in, first out) method is prohibited.	Unlike IFRS Accounting Standards, the LIFO method is permitted, but FIFO and weighted average methods are recommended, as an alternative to the specific identification. If the LIFO method is used, additional information about the current value of inventory should be disclosed in the notes.
Other cost formulas, such as the standard cost or retail method, may be used when the results approximate actual cost.	Like IFRS Accounting Standards, other cost formulas, such as the standard cost or retail method, may be used when the results approximate actual cost.
The same cost formula is applied to all inventories having a similar nature and use to the entity.	Like IFRS Accounting Standards, the same cost formula is applied to all inventories having a similar nature and use to the entity.
Inventory is written down to net realisable value when net realisable value is less than cost. Net realisable value is the estimated selling price less the estimated costs of completion and sale.	Like IFRS Accounting Standards, inventory is written down to net realisable value when net realisable value is less than cost. Also, net realisable value is the estimated selling price less the estimated costs of completion and sale.
If the net realisable value of an item that has been previously written down subsequently increases, then the write-down is reversed.	Like IFRS Accounting Standards, if the net realisable value of item that has been previously written down subsequently increases, then the write-down is reversed.
<b>References:</b> IAS 2	<b>References:</b> RJ 220

### 3.7 Biological assets

IFRS Accounting Standards	Dutch GAAP
Biological assets are measured at fair value less costs to sell unless it is not possible to measure fair value reliably, in which case they are measured at cost. Gains and losses from changes in fair value less costs to sell are recognised in profit or loss.	Unlike IFRS Accounting Standards, there is no specific guidance for biological assets other than for agricultural produce. In general, the requirements for property, plant and equipment or inventories would apply (chapter 3.1 and 3.6).
Agricultural produce harvested from a biological asset is measured at fair value less costs to sell at the point of harvest. After harvest, the inventories standard generally applies (chapter 3.6), even if the harvested produce requires additional biological transformation or harvest.	Like IFRS Accounting Standards, the inventories standard applies for agricultural produce. Unlike IFRS Accounting Standards, agricultural produce can be recognised at cost or lower net realisable value or at their current value (net realisable value).
All gains and losses from changes in fair value or net realisable value are recognised in profit or loss.	Unlike IFRS Accounting Standards, unrealised changes in fair value can be recognised directly in equity (revaluation reserve) or in profit or loss (the latter is only allowed when frequent market quotations are available). Realised revaluation reserve should be recognised in the profit and loss account as a separate item, when the related inventories are sold.
	If the decrease of the net realisable value exceeds the amount of the revaluation reserve, the excess is charged to profit or loss.
<b>References:</b> IAS 2, IAS 41	<b>References:</b> DCC, RJ 220, Current Value Decree (Besluit actuele waarde)

### 3.8 Impairment of non-financial assets

IFRS Accounting Standards	Dutch GAAP
The impairment standard IAS 36 covers impairment of property, plant and equipment, goodwill, intangible assets, right-of-use assets, investment property and biological assets measured at cost less accumulated depreciation, and investments in subsidiaries and equity-accounted investees (joint ventures and associates).	Like IFRS Accounting Standards, RJ 121 covers the impairment of property, plant and equipment, goodwill, intangible assets, right-of-use assets (if the entity applies IFRS 16) and investments in subsidiaries, joint ventures and participating interests (associates).
Impairment testing generally is required only when there is an indication of impairment.	Like IFRS Accounting Standards, impairment testing generally is required only when there is an indication of impairment.
Annual impairment testing is required for goodwill and intangible assets that either are not yet available for use or that have an indefinite useful life. This impairment test may be performed at any time during an annual reporting period, provided it is performed at the same time each year.	Unlike IFRS Accounting Standards, annual impairment testing is required only for intangible assets (including goodwill) that are either not yet available for use or amortised over more than 20 years.
	Unlike IFRS Accounting Standards, the impairment test must be performed at the balance sheet date.



Depending on the specific asset and circumstances, assets are tested for impairment as an individual asset, as part of a cash generating unit (CGU) or as part of a group of CGUs. A CGU is the smallest group of assets that generates cash inflows that are largely independent of the cash inflows of other assets or groups of assets.

Whenever possible, an impairment test is performed for an individual asset. Otherwise, assets are tested for impairment at the CGU level.

Goodwill is allocated to CGUs or group of CGUs that are expected to benefit from synergies of the business combination from which it arose. The allocation is based on the level at which goodwill is monitored internally, restricted by the size of the entity's operating segments before aggregation.

The carrying amount of goodwill is grossed up for impairment testing if it arose in a transaction in which NCI were measured initially based on their proportionate share of identifiable net assets.

An impairment loss is recognised if an asset's or cash generating unit's (CGU) carrying amount exceeds the higher of its fair value less costs to sell and value-in-use, which is always based on the net present value of future cash flows. The impairment loss is measured as the difference between the carrying amount of the asset, or CGU, and its recoverable amount.

Estimates of future cash flows used in the value-in-use calculation are specific to the entity and need not be the same as those of a market participant. Conversely, estimates of future cash flows used to estimate fair value less costs of disposal are consistent with those of a market participant. All cash flows used to estimate the recoverable amount are discounted to a present value.

The pre-tax discount rate used in the value-in-use calculation reflects the market's assessment of the risks specific to the asset or CGU.

An impairment loss for a CGU is allocated first to any goodwill and then pro rata to other assets in the CGU that are in scope of the impairment standard.

An impairment loss is generally recognised in profit or loss. An exception relates to assets revalued through OCI.

An impairment loss on a revalued asset is charged directly to the revaluation reserve to the extent that it reverses a previous revaluation surplus relating to the same asset. Any excess is recognised in profit or loss.

Like IFRS Accounting Standards, depending on the specific asset and circumstances, assets are tested for impairment as an individual asset, as part of a cash generating unit (CGU) or as part of a group of CGUs. A CGU is the smallest group of assets that generates cash inflows that are largely independent of the cash inflows of other assets or groups of assets.

Like IFRS Accounting Standards, whenever possible, an impairment test is performed for an individual asset. Otherwise, assets are tested for impairment at the CGU level.

Like IFRS Accounting Standards, goodwill is allocated to CGUs or group of CGUs that are expected to benefit from synergies of the business combination from which it arose. The allocation is based on the level at which goodwill is monitored internally, restricted by the size of the entity's operating segments before aggregation.

Unlike IFRS Accounting Standards, no specific rules are given regarding impairment testing for NCI.

Like IFRS Accounting Standards, an impairment loss is recognised if an asset's or cash generating unit's (CGU) carrying amount exceeds the higher of its fair value less costs to sell and value-in-use, which is based on the net present value of future cash flows.

Like IFRS Accounting Standards, estimates of future cash flows used in the value-in-use calculation are specific to the entity, and may not be the same as the market's assessment. Additionally, the determination of fair value less cost of disposal determination is similar to the IFRS requirement.

Like IFRS Accounting Standards, the discount rate used in the value-in-use calculation is a pre-tax rate that reflects the risks specific to the asset or CGU.

Like IFRS Accounting Standards, an impairment loss for a CGU is allocated first by writing down goodwill, then pro rata to other assets in the CGU.

Like IFRS Accounting Standards, an impairment loss on a revalued asset is charged directly to the revaluation reserve to the extent that it reverses a previous revaluation surplus relating to the same asset. Any excess is recognised in profit or loss.

If there is an indication of reversal of impairment for an asset other than goodwill and the recoverable amount of the impaired asset of CGU increases subsequently, then the impairment loss is generally reversed. A reversal of an impairment loss is recognised in profit or loss. An exception relates to assets revalued through OCI.

An impairment loss for goodwill is never reversed.

**References:**  
IAS 36, IAS 38, IFRS 13, IFRIC 10

Like IFRS Accounting Standards, reversals of impairment are recognised in profit or loss. Unlike IFRS Accounting Standards, when the nature of expense model is applied, (reversals of) impairment losses must be presented as 'other changes in the value of intangible and tangible fixed assets' in the profit and loss account.

Like IFRS Accounting Standards, reversals of impairment in respect of goodwill are not allowed.

**References:**  
RJ 121, RJ 210, RJ 212, RJ 272

### 3.9 Impairment of financial assets

IFRS Accounting Standards	Dutch GAAP
<p>The impairment model in the IFRS 9 <i>Financial Instruments</i> standard (expected credit loss/ECL model) covers financial assets measured at amortised cost, investments in debt instruments measured at Fair value through Other Comprehensive Income ('FVOCI'), certain loan commitments and financial guarantee contracts issued, lease receivables and contract assets.</p> <p>Investments in equity instruments are outside the scope of the ECL requirements.</p> <p>Impairment is recognised using an expected loss model, which means that it is not necessary for a loss event to occur before an impairment loss is recognised.</p> <p>The general approach of the ECL model uses two measurement bases: 12-months ECLs and lifetime ECLs, depending on whether the credit risk on a financial instrument has increased significantly since initial recognition.</p> <p>ECLs on trade receivables and contract assets that do not have a significant financing component are always measured at lifetime ECLs. There is an accounting policy election to measure ECLs on trade receivables that have a significant financing component and on lease receivables either using the general approach or at lifetime ECLs.</p> <p>For financial assets that are credit-impaired on initial recognition, ECLs are measured as the change in lifetime ECLs since initial recognition. Accordingly, the amount recognised as a loss allowance for these assets is not the total amount of lifetime ECLs, but instead the changes in lifetime ECLs since initial recognition of the asset.</p>	<p>Unlike IFRS Accounting Standards, the expected credit loss (ECL model) has not been incorporated in the standards of the RJ.</p> <p>However, entities are allowed to account for impairments on financial instruments based on the expected credit loss model (ECL) in accordance with IFRS 9 <i>Financial Instruments</i> and IFRS 7 <i>Financial Instruments: Disclosures</i>.</p> <p>Unlike IFRS Accounting Standards, impairments are determined and recognised on the basis of the 'incurred loss model'. This means that the recoverable amount is determined if objective indicators for an impairment exist on balance sheet date.</p> <p>As an alternative, Dutch GAAP provides the possibility to measure at 'cost or lower market value', and for derivatives (which are measured at cost) this measurement method is even obligatory.</p> <p>As a second alternative, Dutch GAAP permits the application of the so-called 'expected credit loss model' from IFRS 9.</p> <p>A change in accounting policies as a result of the first time adoption of the ECL model has to be accounted for as an accounting change in accordance with RJ 140 <i>Changes in accounting policies</i>, although the comparatives do not have to be restated.</p> <p>The following guidance only applies if an entity does not apply the IFRS 9 ECL model.</p>

ECLs are measured in a way that reflects:

- a probability-weighted amount determined by evaluating a range of possible outcomes;
- the time value of money; and
- reasonable and supportable information about past events, current conditions and forecasts of future economic conditions.

A financial asset is impaired, or a group of financial assets are impaired and impairment losses are incurred if, and only if, there is objective evidence of impairment as a result of one or more events that occurred after the asset's initial recognition (a 'loss event').

The following are examples of objective indicators of impairment (step 1):

- Significant financial difficulty of the issuer
- Breach of contract, such as default or delinquency in interest or principal payments
- A concession from the lender to the borrower for economic or legal reasons relating to financial difficulties of the borrower, which the lender would not otherwise take into consideration
- Probability of bankruptcy or other financial reorganisation
- Disappearance of an active market for an asset due to financial difficulties
- Observable data indicating that there is a measurable decrease in the estimated future cash flows from a group of financial assets since their initial recognition, although the decrease cannot be identified with the individual assets in the group.

An assessment for indicators of objective evidence that a financial asset measured at amortised cost is impaired is required at least at every balance sheet date.

An impairment loss for financial assets measured at amortised cost is the difference between the asset's carrying amount and the present value of the estimated future cash flows discounted at the asset's original effective interest rate (step 2).

For assets carried at amortised cost, impairment is measured based on incurred credit losses using the instrument's original effective interest rate.

Unlike IFRS Accounting Standards, for primary financial instruments valued at amortised cost and derivative financial assets valued at cost (chapter 6.0), RJ 290 allows an alternative for the 'two step approach' under IFRS Accounting Standards, which is, to value the instrument at 'cost-or-lower-market (fair) value'.

**References:**  
IFRS 9

**References:**  
RJ 212, RJ 252, RJ 290

### 3.10 Provisions

IFRS	Dutch GAAP
A provision is recognised for a legal or constructive obligation arising from a past event if there is a probable outflow of resources and the amount can be estimated reliably. 'Probable' in this context means more likely than not.	Like IFRS Accounting Standards, a provision is recognised on the basis of a legal or constructive obligation, if there is a probable outflow of resources and the amount can be estimated reliably. 'Probable' in this context means more likely than not.
A 'constructive obligation' arises when an entity's actions create valid expectations of third parties that the entity will accept and discharge certain responsibilities.	Like IFRS Accounting Standards, a 'constructive obligation' arises when an entity's actions create valid expectations of third parties that the entity will accept and discharge certain responsibilities.
No provision may be recognised for future operating losses.	Like IFRS Accounting Standards, no provision may be recognised for future operating losses.
A provision is measured at the 'best estimate' of the expenditure to be incurred.	Like IFRS Accounting Standards, a provision is measured at the best estimate of the anticipated expenditure to be incurred.
If there is a large population of items, then the obligation is generally measured at its expected value.	Like IFRS Accounting Standards, if there is a large population of items, then the obligation is generally measured at its expected value.
If there is a continuous range of equally possible outcomes for a single event, then the obligation is measured at the mid-point in the range.	Like IFRS Accounting Standards, if there is a continuous range of equally possible outcomes for a single event, then the obligation is measured at the mid-point in the range.
If the possible outcomes of a single obligation are mostly higher (lower) than the single most likely outcome, then the obligation is measured at an amount higher (lower) than the single most likely outcome.	Like IFRS Accounting Standards, if the possible outcomes of a single obligation are mostly higher (lower) than the single most likely outcome, then the obligation is measured at an amount higher (lower) than the single most likely outcome.
Provisions are discounted if the effect of discounting is material.	Like IFRS Accounting Standards, the discounting of provisions is required if the effect of time value of money is material.
Provisions are discounted using a pre-tax rate that reflects the time value of money and the risks specific to the liability.	Like IFRS Accounting Standards, the estimate of future cash flows and the discount rate consistently reflect the assumptions about price increases as a result of inflation. Estimates of future cash flows and the discount rate are expressed both in nominal terms or in real terms.
IAS 37 does not explicitly require, but implicitly indicates that the risk-free rate, being the return on government bonds, best reflects the current market rate of interest.	Provisions are discounted using a pre-tax rate that reflects the time value of money and the risks specific to the liability.
	Unlike IFRS Accounting Standards, RJ 252 indicates that the market interest rate of high-quality corporate bonds best reflects the current market rate of interest.



A reimbursement right is recognised as a separate asset when recovery is virtually certain, capped at the amount of the related provision. Any gain in excess of this amount is recognised only when it is realised.

Like IFRS Accounting Standards, a reimbursement right is recognised as a separate asset. Unlike IFRS Accounting Standards, the recognition threshold is 'more likely than not' instead of 'virtually certain'. Like IFRS Accounting Standards, this is capped at the amount of the related provision, and any gain in excess of this amount is recognised only when it is realised.

A provision for restructuring is not recognised until there is a formal plan and details of the restructuring have been communicated to those affected by the plan before or on the balance sheet date.

Like IFRS Accounting Standards, a provision for restructuring costs is not recognised until there is a formal plan and details of the restructuring have been communicated to those affected by the plan. Unlike IFRS Accounting Standards, the communication criterion may be met after the balance sheet date but before the financial statements are prepared ('authorised for issue').

Provisions are not recognised for repairs or maintenance of own assets or for self-insurance before an obligation is incurred.

Like IFRS Accounting Standards, provisions for self-insurance are prohibited. Unlike IFRS Accounting Standards, provisions for periodic major maintenance and major overhauls are allowed (chapter 3.10).

A provision is recognised for a contract that is onerous.

Like IFRS Accounting Standards, a provision is recognised for a contract that is onerous.

The amendment in IAS 37 clarifies that the 'cost of fulfilling a contract' for the purposes of the onerous contract assessment comprises the costs that relate directly to the contract, including both the incremental costs and an allocation of other direct costs to fulfil the contract.

The expected period of outflow of resources shall be disclosed for every provision category.

IFRIC 21 prescribes that a liability in relation to a government levy shall be recognised at the time that it has met all of the conditions from the relevant legislation and/or regulations.

Many entities make public statements about their 'net-zero' or similar climate-related commitments. When an entity makes a commitment to be net zero – e.g. by the year 2050 – this usually means that by 2050 it plans to reduce its greenhouse gas emissions to as close to zero as possible and offset its remaining emissions. On its own, setting and announcing a climate-related target does not automatically trigger a liability. An entity considers the nature of its commitment and how it will fulfil it. The commitment needs to create a present obligation at the reporting date as a result of a past event (e.g. 'damage done') for a liability to exist at the reporting date. Other recognition criteria also need to be met to recognise a liability.

An entity may be subject to penalties only if obligating events are detected.

- In our view, if an entity is obliged to self-report obligating events, then the detection risk (i.e. the possibility that the event will not be detected) should not be considered when measuring the obligation. Examples of events that generally require self-reporting include, but are not limited to, taxes and, in some countries, environmental contamination.
- When self-reporting is not required and there is uncertainty about the amount of an obligation in respect of a past event, then we believe that it may be appropriate to consider detection risk in measuring the provision (i.e. the possibility that the event will not be detected).

**References:**  
IAS 37, IFRS 15, IFRIC 1, IFRIC 5, IFRIC 6, IFRIC 21, IFRIC 23.8

Like IFRS Accounting Standards, the direct cost approach is followed to identify the cost of fulfilling a contract.

Unlike IFRS Accounting Standards, it is recommended to disclose which amount from the total of the provisions is expected to be settled within a year and which amount after five years.

Unlike IFRS Accounting Standards, as an alternative, the recognition of such a liability may happen during the period to which the government levy relates.

Like IFRS Accounting Standards, the standard criteria outlined for recognising a provision apply. The obligation must represent a present or constructive obligation at the reporting date, arising from a past event.

Similar under IFRS Accounting Standards, no specific guidelines for the recognition of a provision for penalties are provided. In line with our perspective under IFRS Accounting Standards, the recognition of obligations for potential penalties requires the entity to assess the likelihood that such penalties will result in an outflow of resources. When there is an obligation to self-report, the possibility of not being detected is not considered. However, if self-reporting is not required and the amount is uncertain, the entity may consider the detection risk in measuring the provision.

**References:**  
RJ 212, RJ 252



### 3.11 Contingent assets and contingent liabilities

IFRS Accounting Standards	Dutch GAAP
<p>Contingent liabilities are present obligations with uncertainties about either the probability of outflow of resources or the amount of the outflows, and possible obligations whose existence is uncertain.</p>	<p>Like IFRS Accounting Standards, contingent liabilities are obligations that generally are not recognised in the balance sheet due to uncertainties about either the probability of outflows of resources or about the amount of the outflows or possible obligations when the existence of an obligation is uncertain. However, unlike IFRS Accounting Standards, long-term obligations that are equally undelivered (e.g. executory contracts) are also contingent liabilities.</p>
<p>Contingent liabilities are not recognised except for those that represent present obligations in a business combination.</p>	<p>Unlike IFRS Accounting Standards, contingent liabilities are not recognised in a business combination, as such contingencies do not meet the general criteria for recognition of a liability.</p>
<p>Contingent liabilities assumed in a business combination are recognised if there is a present obligation arising from past events and their fair value is reliably measurable.</p>	<p>Unlike IFRS Accounting Standards, there are specific provisions derived from legislation for off-balance sheet arrangements.</p>
<p>Details of contingent liabilities are disclosed in the notes to the financial statements, unless the probability of an outflow is remote or in rare cases when disclosure could seriously prejudice the entity's position in a dispute with another party.</p>	<p>Like IFRS Accounting Standards, details of contingent liabilities are disclosed in the notes to the financial statements, unless the probability of an outflow is remote or in rare cases when disclosure could seriously prejudice the entity's position in a dispute with another party.</p>
<p>Contingent assets are possible assets whose existence is uncertain.</p>	<p>Like IFRS Accounting Standards, contingent assets are defined as possible assets arising from past events whose existence is uncertain. However, unlike IFRS Accounting Standards, the definition also includes assets of which the value cannot be estimated reliably and assets for which it is not probable that related future economic benefits will flow to the entity.</p>
<p>IFRS Accounting Standards set a high threshold for contingent assets, which are not recognised in the statement of financial position until their realisation is virtually certain, at which point the assets are no longer considered contingent. If an inflow of economic benefits is probable (more likely than not), then details are disclosed in the notes.</p>	<p>Like IFRS Accounting Standards, contingent assets are not recognised in the balance sheet unless their realisation is virtually certain. Unlike IFRS Accounting Standards, disclosure may be omitted if it is impracticable to make an estimate, even if it is probable that economic benefits will flow to the entity.</p>
<p>A reimbursement right is recognised as a separate asset when recovery is virtually certain, capped at the amount of the related provision. Any gain in excess of this amount is recognised only when it is realised.</p>	<p>Unlike IFRS Accounting Standards, any reimbursement from a third party shall be taken into account when determining the amount of the provision, provided that it is probable that the reimbursement takes place and that the amount of the reimbursement can be reliably estimated.</p>
<p><b>References:</b> IAS 20, IFRS 3, IAS 37, IFRIC 1, IFRIC 5, IFRIC 6, IFRIC 21</p>	<p><b>References:</b> RJ 216, RJ 252, RJ 274</p>

### 3.12 Income tax

IFRS Accounting Standards	Dutch GAAP
<p>'Income taxes' are taxes based on taxable profits, and taxes that are payable by a subsidiary, associate or joint arrangement on distribution to the reporting entity (e.g. withholding taxes).</p>	<p>Like IFRS Accounting Standards, 'Income taxes' are taxes based on taxable profits, and taxes that are payable by a subsidiary, associate or joint venture on distribution to the reporting entity (e.g. withholding taxes).</p>
<p>The total income tax expense (income) recognised in a period is the sum of current tax expense (or recovery) plus the change in deferred tax liabilities and assets during the period, net of tax amounts recognised outside profit or loss – i.e. in OCI or directly in equity or arising from a business combination.</p>	<p>Like IFRS Accounting Standards, the total income tax expense recognised in profit or loss is the sum of current tax expense (or recovery) plus the change in deferred tax liabilities and assets during the period, net of tax amounts recognised directly in equity or arising from a business combination.</p>
<p>Income tax relating to items recognised outside profit or loss, in the current or a previous period, is itself recognised outside profit or loss.</p>	<p>Like IFRS Accounting Standards, income tax relating to items recognised outside profit or loss, in the current or previous periods, is recognised outside profit or loss.</p>
<p>Current tax is the amount of income taxes payable (recoverable) in respect of the taxable profit (loss) for a period.</p>	<p>Like IFRS Accounting Standards, current tax represents the amount of income taxes payable (recoverable) in respect of the taxable profit (tax loss) for a period.</p>
<p>The measurement of current tax is based on rates and tax laws that are enacted or substantively enacted at the reporting date.</p>	<p>Like IFRS Accounting Standards, the measurement of current tax is based on rates and tax laws that are enacted or substantively enacted at the balance sheet date.</p>
<p>Current tax assets and liabilities are offset only if there is a legally enforceable right to set off and the entity intends to offset or to settle simultaneously.</p>	<p>Like IFRS Accounting Standards, current tax assets and liabilities are offset only if there is a legally enforceable right to set off and the entity intends to offset or to settle simultaneously.</p>
<p>In the case of uncertainty about an income tax treatment, an entity considers whether it is probable that a tax authority will accept the treatment used in its tax filing. If the tax authority is likely to accept the entity's tax treatment, then the current and deferred taxes are measured consistently with the tax treatment in the income tax filing. However, if the tax authority is unlikely to accept the entity's tax treatment, then the effect of the tax uncertainty is reflected in measuring current or deferred tax by using either the most likely amount or the expected value method.</p>	<p>Like IFRS Accounting Standards, if the tax authority is likely to accept the entity's tax treatment, then the current and deferred taxes are measured consistently with the tax treatment in the income tax filing. Otherwise, the effect of the tax uncertainty is reflected in measuring current or deferred tax by using either the most likely amount or the expected value method. Like IFRS Accounting Standards, the entity presumes that the tax authorities possess all relevant information and detection risk is not considered.</p>
<p>The entity presumes that the tax authorities possess all relevant information and detection risk is not considered.</p>	<p>Like IFRS Accounting Standards, if the tax authority is likely to accept the entity's tax treatment, then the current and deferred taxes are measured consistently with the tax treatment in the income tax filing. Otherwise, the effect of the tax uncertainty is reflected in measuring current or deferred tax by using either the most likely amount or the expected value method. Like IFRS Accounting Standards, the entity presumes that the tax authorities possess all relevant information and detection risk is not considered.</p>
<p>IFRS Accounting Standards do not contain specific guidance on allocating taxes to the financial statements of members within a consolidated tax group that file a consolidated tax return, and practice may vary.</p>	<p>Unlike IFRS Accounting Standards, RJ 272 has provisions for the allocation of taxes within a tax group (fiscal unity).</p>
	<p>With regard to liabilities relating to group companies, it shall be disclosed separately in the notes that the legal entity has been included in a tax group and, as a result of that, is jointly and severally liable for tax debts of the tax group as a whole.</p>



Deferred tax is recognised for the estimated future tax effects of temporary differences, unused tax losses carry forward and unused tax credits carried forward.

A temporary difference is the difference between the tax base of an asset or liability and its carrying amount in the financial statements that will result in taxable or deductible amounts in future periods when the carrying amount is recovered or settled. This approach focuses on the statement of financial position carrying amounts, rather than on the differences between the profit and loss and taxable profits.

A deferred tax liability (asset) is recognised unless it arises from:

- the initial recognition of an asset or liability in a transaction that is not a business combination, and at the time of the transaction affects neither accounting profit nor taxable profit;
- the initial recognition of goodwill; or
- post-acquisition adjustments of goodwill for which amortisation is not tax deductible.

A deferred tax liability is recognised for post-acquisition adjustments of goodwill for which amortisation is tax deductible.

Deferred tax assets and liabilities are not recognised in respect of investments in subsidiaries, associates and joint ventures/arrangements if certain conditions are met.

A deferred tax asset is recognised to the extent that it is probable that it will be realised – i.e. a net approach.

It is probable that taxable profit will be available against which a deductible temporary difference can be utilised when there are sufficient taxable temporary differences relating to the same taxation authority and the same taxable entity which are expected to reverse.

The measurement of deferred tax is based on the expected manner of settlement (liability) or recovery (asset).

Deferred tax assets recognised in relation to share-based payment arrangements are adjusted each period to reflect the amount of tax deduction that the entity would receive if the award were tax deductible in the current period based on the current market price of the shares.

Like IFRS Accounting Standards, deferred tax is recognised for the estimated future tax effects of temporary differences, tax losses carry forwards and unused tax credit carried forward.

Like IFRS Accounting Standards, a temporary difference is the difference between the tax base of an asset or liability and its carrying amount in the financial statements.

The recognition criteria and exemptions of deferred tax liabilities (assets) are in line with those of IFRS Accounting Standards.

However, unlike IFRS Accounting Standards, there is no initial recognition exemption for goodwill. Furthermore, unlike IFRS Accounting Standards, when a non-monetary asset is revalued, it is only highly recommended to recognise a deferred tax liability.

Like IFRS Accounting Standards, deferred tax assets and liabilities are not recognised in respect of investments in subsidiaries, participating interests (associates) and joint ventures if certain conditions are met.

Like IFRS Accounting Standards, a deferred tax asset is recognised to the extent that it is probable that it will be realised – i.e. a net approach.

Like IFRS Accounting Standards, it is probable that taxable profit will be available against which a deductible temporary difference can be utilised when there are sufficient taxable temporary differences relating to the same taxation authority and the same taxable entity which are expected to reverse. Unlike IFRS Accounting Standards, when assessing whether there are sufficient taxable temporary differences, taxable temporary differences resulting from revaluation are disregarded.

Like IFRS Accounting Standards, the measurement of deferred tax is based on the expected manner of settlement (liability) or recovery (asset).

Unlike IFRS Accounting Standards, Dutch GAAP has no specific guidance related to this matter; the general provisions of the income taxes standard apply.

As a result of a business combination, the probability of realising a pre-acquisition deferred tax asset of the acquirer could change. Such changes are recognised separately from the acquisition accounting and, therefore, the acquirer does not take it into account in measuring the goodwill or bargain purchase gain it recognises in the business combination.

The potential benefit of the acquiree's income tax loss carryforwards or other deferred tax assets might not satisfy the criteria for separate recognition when a business combination is initially accounted for but might be realised subsequently. An entity recognises acquired deferred tax benefits that it realises after the business combination as follows:

- a) Acquired deferred tax benefits recognised within the measurement period that result from new information about facts and circumstances that existed at the acquisition date are applied to reduce the carrying amount of any goodwill related to that acquisition. If the carrying amount of that goodwill is zero, any remaining deferred tax benefits are recognised in profit or loss.
- b) All other acquired deferred tax benefits realised are recognised in profit or loss (or, if IAS 12 so requires, outside profit or loss).

A deferred tax asset or liability is not recognised if it arises from the initial recognition of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, it affects neither accounting profit nor taxable profit and does not give rise to equal taxable and deductible temporary differences.

Deferred tax is measured on an undiscounted basis (nominal value).

A deferred tax liability (asset) is recognised for the step up in tax bases as a result of an intragroup transfer of assets between jurisdictions. Additionally, the current tax effects for the seller are recognised in the current tax provision.

A deferred tax liability (asset) is recognised for exchange gains and losses related to foreign non-monetary assets and liabilities that are remeasured into the functional currency, using historical exchange rates or indexing for tax purposes.

Deferred tax assets and liabilities are classified as non-current in a classified statement of financial position.

Unlike IFRS Accounting Standards, changes in the acquirer's deferred tax assets resulting from a business combination are taken into account in determining the goodwill; the deferred tax asset recognised by the acquirer is deducted from the goodwill arising on the acquisition.

Unlike IFRS Accounting Standards, subsequent adjustments to deferred tax assets arising on the acquisition are recognised through profit and loss, and simultaneously the carrying amount of goodwill is also adjusted through profit and loss.

Unlike IFRS Accounting Standards, Dutch GAAP does not state a term for adjustments to goodwill in case of deferred tax assets. Deferred tax assets recognised later on are recognised in profit or loss. In addition, the book value of the goodwill is reduced to the amount that would have been recognised if the deferred tax asset had been recognised as an identifiable asset from the acquisition date and recognised as an expense.

Unlike IFRS Accounting Standards, Dutch GAAP does not contain specific requirements about the accounting for deferred tax on the impact on initial recognition of an asset or liability that is acquired outside of a business combination.

Unlike IFRS Accounting Standards, deferred tax assets and liabilities shall be measured at either nominal or present value. If measurement at present value is applied, this shall be disclosed clearly in the notes.

Unlike IFRS Accounting Standards, there is no specific guidance regarding the tax rate at which deferred taxes arising from intragroup transactions should be recognised. However, as the main principle is to be applied, this will not result in differences with IFRS Accounting Standards.

Like IFRS Accounting Standards, when a non-monetary asset is revalued, it is highly recommended to recognise a deferred tax liability.

Unlike IFRS Accounting Standards, the general classification rules for current/non-current assets apply to deferred tax assets; therefore, a portion of a deferred tax asset may be classified as current. Unlike IFRS

# 4 Specific income statement items

## 4.1 Revenue from contracts with customers

IFRS Accounting Standards	Dutch GAAP
<p>IFRS 15 applies to contracts to deliver goods or services to a customer. A 'customer' is a party that has contracted with an entity to obtain goods or services that are an output of the entity's ordinary activities.</p> <p>IFRS 15 does not apply to:</p> <ul style="list-style-type: none"> <li>• lease contracts in the scope of IFRS 16;</li> <li>• insurance contracts in the scope of IFRS 4;</li> <li>• financial instruments and other contractual rights or obligations in the scope of IFRS 9, IFRS 10, IFRS 11, IAS 27 and IAS 28; and</li> <li>• non-monetary exchanges between entities in the same line of business to facilitate sales to customers or potential customers.</li> </ul> <p>A contract with a customer may be partially in the scope of IFRS 15 and partially in the scope of another accounting standard or interpretation. If the other accounting standard or interpretation specifies how to separate and/or initially measure one or more parts of a contract, then an entity first applies those requirements. Otherwise, the entity applies the guidance in IFRS 15 to separate and/or initially measure the separately identified parts of the contract.</p>	<p>The accounting guidance for revenue recognition and related cost (RJ 221 <i>Construction contracts</i> and RJ 270 <i>Income statement</i>) was based until 2021 on the former IFRS Standards IAS 11 and IAS 18.</p> <p>As from financial years starting at 1 January 2022 or later the revised RJ 221 and RJ 270 are more aligned with IFRS 15 <i>Revenue from Contracts with Customers</i>.</p> <p>RJ 270 details the recognition of revenue in the income statement in the case of the sale of manufactured or purchased goods, the provision of services and also the revenue from licences. RJ 221 is, in fact, a specific interpretation for construction contracts of the five-step model in RJ 270. In addition, RJ 221 has specific definitions and accounting rules that are characteristic of project organisations, such as variations in contract work, claims and the recognition of contract revenues and costs by reference to the stage of completion of the contract. Excluded from RJ 270 and RJ 221 are:</p> <ul style="list-style-type: none"> <li>• leases (RJ 292 <i>Leasing</i>);</li> <li>• dividends from capital interests which are accounted for under one of the variants of the equity method;</li> <li>• insurance contracts, insurance companies;</li> <li>• changes in the fair value of financial assets and financial liabilities or the disposal of such assets and liabilities (RJ 290 <i>Financial instruments</i>);</li> <li>• changes in the value of other current assets; and</li> <li>• natural increases in livestock, agricultural or forestry products, or the extraction of mineral ores;</li> <li>• goods or services that are exchanged or swapped for goods or services that are approximately equal in nature and fair value.</li> </ul> <p>Companies are permitted to apply IFRS 15 as adopted by the European Union for revenue and related costs for sale of goods and the provision of services instead of section 1 of RJ 270 and RJ 221 section 1 to 4, provided there is a full and consistent application of IFRS 15.</p> <p>Accordingly, the following differences are still relevant, if the option to apply IFRS 15 has not been opted under Dutch GAAP.</p>

<p>Deferred tax relating to items charged or credited directly to equity is itself charged or credited directly to equity.</p> <p>Deferred tax is measured based on enacted or substantively enacted tax rates and tax laws at the reporting date.</p> <p>Deferred tax liabilities and assets are offset if the entity has a legally enforceable right to set off current tax liabilities and assets, and the deferred tax liabilities and assets relate to income taxes levied by the same tax authority on either the same taxable entity or different taxable entities that intend to settle current taxes on a net basis or their tax assets and liabilities will be realised simultaneously.</p> <p>'Pillar Two Taxes' are taxes arising from tax laws enacted or substantively enacted to implement rules published by the Organisation for Economic Co-operation and Development (OECD). The mechanisms under these rules are often referred to as 'global minimum top-up tax' or 'top-up-tax'. Pillar Two top-up taxes are determined based on taxable profit or loss in a specific jurisdiction included in the consolidated financial statements of the ultimate parent entity – i.e. they are levied on a net amount. Therefore, in our view all Pillar Two top-up taxes levied by the tax authorities are generally income taxes in the scope of the income taxes standard, for the purposes of all financial statements, including the consolidated financial statements of the ultimate parent entity or intermediate parent entities and separate financial statements of group entities.</p> <p>As a temporary mandatory exception, an entity subject to Pillar Two top-up taxes neither recognises nor discloses information about related deferred taxes. However, from 31 December 2023, an entity is required to provide new specific disclosures about its potential exposure to the top-up tax at the reporting date in periods in which a tax law is enacted but the top-up tax is not yet in effect.</p>	<p>Accounting Standards, deferred tax liabilities are classified as a separate class of provisions within liabilities, for which the current/non-current distinction is not applicable.</p> <p>Like IFRS Accounting Standards, deferred tax relating to items charged or credited directly to equity is itself charged or credited directly to equity.</p> <p>Like IFRS Accounting Standards, deferred tax is measured based on enacted or substantively enacted tax rates.</p> <p>Like IFRS Accounting Standards, deferred tax liabilities and assets are offset if the entity has a legally enforceable right to set off current tax liabilities and assets to the extent that they relate to the same financial year and taxes are levied by the same tax authority on the same taxable legal entity or fiscal unit.</p> <p>Like IFRS Accounting Standards, DASB has incorporated several changes with regard to Pillar Two Taxes, which are similar to IAS 12 amendments.</p> <p>Like IFRS Accounting Standards, the Pillar Two top-up taxes levied by the tax authorities are in the scope of the income taxes standard.</p> <p>Like IFRS Accounting Standards, the amendments in RJ 272 introduce a temporary mandatory exemption, so that no deferred tax assets and liabilities related to income taxes arising from Pillar Two model rules are recognised in the financial statements.</p> <p>However, unlike IFRS Accounting Standards, Dutch GAAP specifically addresses the accounting for Pillar Two top-up taxes in a consolidated group including the accounting for recharges.</p> <p>Like IFRS Accounting Standards, the amendments to RJ 272 also specifically set out (disclosure) requirements on the Pillar Two top-up taxes.</p>
<p><b>References:</b> IAS 12, IFRIC 23, SIC 25</p>	<p><b>References:</b> RJ 272, RJ statement 2023-14</p>



<p>A five-step model is used to implement the core principle that is used to determine when to recognise revenue, and at what amount.</p> <p>Under Step 1 (identify the contract), an entity accounts for a contract under the model when it is legally enforceable and specific criteria are met. These criteria include that collection of consideration is 'probable', which means 'more likely than not'.</p> <p>Under Step 2 (identify the performance obligations in the contract), an entity breaks down the contract into one or more distinct performance obligations.</p> <p>Under Step 3 (determine the transaction price), an entity determines the amount of consideration to which it expects to be entitled in exchange for transferring goods or services to a customer.</p> <p>In determining the transaction price, the company considers, among other things, the effects of:</p> <ul style="list-style-type: none"> <li>• variable consideration;</li> <li>• significant financing components;</li> <li>• non-cash consideration; and</li> <li>• consideration payable to customers.</li> </ul> <p>IFRS 15 considers the fixed part and the variable part of the consideration separately for accounting purposes and prescribes that the revenue from variable consideration must be recognised for the part for which it is highly probable that a significant reversal in the amount of cumulative revenue recognised will not occur. This means that under IFRS 15 uncertainty about (part of) the variable consideration does not affect the recognition of the remaining part of the revenue (e.g. the fixed part).</p>	<p>The main differences between the revised standards and IFRS 15 are:</p> <ul style="list-style-type: none"> <li>• not adopting the control-based model of IFRS 15;</li> <li>• maintaining comprehensive guidance regarding sales transactions with buy-back or sell-back agreements in RJ 270;</li> <li>• limitation of the variable consideration;</li> <li>• the loss provision;</li> <li>• maintaining a principle-based approach rather than the more rule-based approach in IFRS 15; and the less extensive disclosures in the new standards.</li> </ul> <p>Like IFRS Accounting Standards, the basis comprises a framework of five steps for the determination of when revenue must be recognised and for which amount. The framework applies to all types of contracts with customers (and types of transactions). In the revised RJ 270 and RJ 221, these five steps are implicitly expressed.</p> <p>Like IFRS Accounting Standards, under Step 1 (identify the contract), an entity accounts for a contract under the model when it is legally enforceable and specific criteria are met. These criteria include that collection of consideration is 'probable', which means 'more likely than not'.</p> <p>Like IFRS Accounting Standards, under Step 2 (identify the performance obligations in the contract), an entity breaks down the contract into one or more distinct performance obligations.</p> <p>Like IFRS Accounting Standards, under Step 3 (determine the transaction price), an entity determines the amount of consideration to which it expects to be entitled in exchange for transferring goods or services to a customer.</p> <p>In determining the transaction price, the company considers, among other things, the effects of:</p> <ul style="list-style-type: none"> <li>• variable consideration;</li> <li>• significant financing components;</li> <li>• non-cash consideration; and</li> <li>• consideration payable to customers.</li> </ul> <p>Dutch GAAP includes as a criterion for revenue recognition that the transaction price is reliably measurable. Unlike IFRS Accounting Standards, this criterion relates to the total consideration (fixed plus variable compensation). If the variable consideration is a relatively large portion of the total consideration, and this portion cannot be recognised or not fully recognised due to the application of prudence because of a more than low probability of subsequent reversal, then the application of the aforementioned criterion may mean that the entire revenue cannot yet be recognised (including the fixed part).</p>
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<p>Under Step 4 (allocate the transaction price to the performance obligations in the contract), an entity generally allocates the transaction price to each performance obligation in proportion of its stand-alone selling price.</p> <p>Under Step 5 (recognise revenue), an entity recognises revenue when or as it satisfies the performance obligation by transferring a good or service to a customer, either at a point in time or over time. A good or service is transferred when or as the customer obtains control of it.</p> <p>The IFRS Accounting Standards include guidance on separating a license of IP (i.e. software) from other components of an arrangement in order to determine whether it is distinct or not. If a license of IP is distinct from other goods or services in the contract, a separate performance obligation exists for which revenue can be recognised at a point or over time.</p> <p>As an exception to the general requirements, for sales- or usage-based royalties that are attributable to a licence of intellectual property, revenue is recognised at the later of:</p> <ul style="list-style-type: none"> <li>• when the subsequent sale or usage occurs; and</li> <li>• the satisfaction or partial satisfaction of the performance obligation to which some or all of the sales- or usage-based royalties have been allocated.</li> </ul> <p>A non-cash consideration received from a customer is measured at fair value. If an entity cannot make a reasonable estimate of the fair value, then it refers to the stand-alone selling price of the promised goods or services.</p> <p>An entity assesses whether a non-refundable up-front fee relates to the transfer of a promised good or service to the customer. If the related activity does not result in the transfer of a promised good or service to the customer, then the up-front fee is an advance payment for performance obligations to be satisfied in the future and is recognised as revenue when those future goods or services are provided.</p>	<p>This may result in revenue being recognised earlier under IFRS 15 than under RJ 270.</p> <p>Like IFRS Accounting Standards, under Step 4 (allocate the transaction price to the performance obligations in the contract), an entity generally allocates the transaction price to each performance obligation in proportion of its stand-alone selling price.</p> <p>Unlike IFRS Accounting Standards, Dutch GAAP couples the criteria for revenue recognition (including the time) to the type of transactions, namely the sale of goods (transfer of significant risk and rewards, at a point in time), rendering of services including construction contracts (with reference to the stage of completion, over a period of time). In certain situations, these differences in starting points can lead to a different timing and/or a different pace of revenue recognition.</p> <p>Like IFRS Accounting Standards, specific provisions exist for revenue recognition concerning licences of intellectual property, such as software, patents and copyrights. Like IFRS Accounting Standards, a distinction is made between providing the right to access (then: revenue recognition over a period of time) and providing a right to use (then: revenue recognition at a point in time).</p> <p>Like IFRS Accounting Standards, as an exception to the general requirements, for sales- or usage-based royalties that are attributable to a licence of intellectual property, revenue is recognised at the later of:</p> <ul style="list-style-type: none"> <li>• when the subsequent sale or usage occurs; and</li> <li>• the satisfaction or partial satisfaction of the performance obligation to which some or all of the sales- or usage-based royalties have been allocated.</li> </ul> <p>Like IFRS Accounting Standards, a non-cash consideration is measured at fair value.</p> <p>Like IFRS Accounting Standards, an entity assesses whether a non-refundable up-front fee relates to the transfer of a promised good or service to the customer. If the related activity does not result in the transfer of a promised good or service to the customer, then the up-front fee is an advance payment for performance obligations to be satisfied in the future and is recognised as revenue when those future goods or services are provided.</p>
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The transaction price includes variable consideration (e.g. rebates, incentives, performance bonuses, compensation for delays and other penalties), based on the estimated amount to which the entity expects to be entitled, having regard to the risk of revenue reversal in making the estimate.

An entity includes an estimate of variable consideration in the transaction price to the extent that it is 'highly probable' that a significant reversal in the amount of cumulative revenue recognised will not occur when the uncertainty associated with the variable consideration is subsequently resolved.

At the end of each reporting period, an entity shall update the estimated transaction price (including updating its assessment of whether an estimate of variable consideration is constrained).

An entity evaluates any consideration payable to a customer (e.g. cash, a coupon or voucher) to determine whether the amount represents a reduction of the transaction price, a payment for distinct goods or services, or a combination of the two.

Discounts are allocated pro rata to all separate performance obligations unless there is evidence that a discount applies to only one or more (but not all) performance obligations.

A warranty is considered a performance obligation if the customer has an option to purchase the good or service with or without the warranty. In that case, the entity allocates a portion of the transaction price to the performance obligation for the service.

When a warranty is not sold separately, the warranty (or part thereof) may still be a performance obligation, if the warranty (or part thereof) provides the customer with a service in addition to the assurance that the product complies with agreed-upon specifications. A warranty that only covers the compliance of a product with specifications (an 'assurance warranty') is accounted for under the provisions standard.

An entity generally capitalises incremental costs to obtain a contract with a customer if it expects to recover those costs. An entity capitalises costs of fulfilling a contract if certain criteria are met. An impairment loss recognised in respect of capitalised costs is reversed if the carrying amount is no longer impaired.

Like IFRS Accounting Standards, Dutch GAAP also includes specific provisions for variable consideration. However, these are not entirely the same as the provisions in IFRS 15. For example, in the context of applying prudence, Dutch GAAP refers to a 'low probability of subsequent reversal', whereas IFRS 15 uses the criterion 'highly probable that no subsequent reversal will occur'. Furthermore, IFRS 15 has a threshold, namely that the constraint only applies to significant reversals. Unlike IFRS Accounting Standards, Dutch GAAP does not mention such a threshold.

Like IFRS Accounting Standards, at the end of each reporting period, an entity shall update the estimated amount of any variable consideration.

Like IFRS Accounting Standards, an entity evaluates any consideration payable to a customer (e.g. cash, a coupon or voucher) to determine whether the amount represents a reduction of the transaction price, a payment for distinct goods or services, or a combination of the two.

Unlike IFRS Accounting Standards, Dutch GAAP contains no such provision and discounts are allocated to all separate performance obligations.

Like IFRS Accounting Standards, a warranty is considered a performance obligation if the customer has an option to purchase the good or service with or without the warranty. In that case, like IFRS Accounting Standards, the entity allocates a portion of the transaction price to the performance obligation for the service.

Like IFRS Accounting Standards, when a warranty is not sold separately, the warranty (or part thereof) may still be a performance obligation, if the warranty (or part thereof) provides the customer with a service in addition to the assurance that the product complies with agreed-upon specifications. A warranty that only covers the compliance of a product with agreed-upon specifications (an 'assurance warranty') is accounted for under the provisions standard.

Unlike IFRS Accounting Standards, costs directly related to the contract and incurred in obtaining the contract may be capitalised if it is probable that the contract will be obtained, those costs can be separately identified and reliably determined.

A modification to an existing contract is recognised in accordance with the economic substance of that modification. Depending on the nature of a modification to an existing contract, the modification is accounted for as:

- a separate contract in addition to the existing contract;
- a termination of the existing contract and the concluding of a new contract (in which the unsatisfied performance obligations of the terminated contract are included); or
- a modification of the existing contract, as if the additional goods or services were part of the existing contract, i.e. a cumulative catch-up adjustment of revenue.

When an entity makes a sale with a right of return, it initially recognises:

- revenue: measured at the gross transaction price, less the expected level of returns calculated using the guidance on estimating variable consideration and the constraint;
- refund liability: measured at the expected level of returns – i.e. the difference between the cash or receivable amount and the revenue as measured above;
- return asset: measured with reference to the carrying amount of the products expected to be returned, less the expected recovery costs (including potential decreases in the value to the entity of returned products); and
- adjustment to cost of sales: measured as the carrying amount of the products sold, less the asset as measured above.

If the entity is a principal, then revenue is recognised on a gross basis – corresponding to the consideration to which the entity expects to be entitled. If the entity is an agent, then revenue is recognised on a net basis – corresponding to any fee or commission to which the entity expects to be entitled.

Onerous contracts are accounted for under the provisions standard.

An entity presents a contract liability or contract asset in its statement of financial position when either party to the contract has performed. Any unconditional rights to consideration are presented separately as a receivable.

Like IFRS Accounting Standards, a modification to an existing contract is recognised in accordance with the economic substance of that modification. Depending on the nature of a modification to an existing contract, the modification is accounted for as:

- a separate contract in addition to the existing contract;
- a termination of the existing contract and the concluding of a new contract (in which the unsatisfied performance obligations of the terminated contract are included); or
- a modification of the existing contract, as if the additional goods or services were part of the existing contract, i.e. a cumulative catch-up adjustment of revenue.

Like IFRS Accounting Standards, when an entity makes a sale with a right of return, it initially recognises:

- revenue: measured at the gross transaction price, less the expected level of returns calculated using the guidance on estimating variable consideration and the constraint;
- refund liability: measured at the expected level of returns – i.e. the difference between the cash or receivable amount and the revenue as measured above;
- return asset: measured with reference to the carrying amount of the products expected to be returned, less the expected recovery costs (including potential decreases in the value to the entity of returned products); and
- adjustment to cost of sales: measured as the carrying amount of the products sold, less the asset as measured above.

Like IFRS Accounting Standards, if the entity is a principal, then revenue is recognised on a gross basis – corresponding to the consideration to which the entity expects to be entitled. If the entity is an agent, then revenue is recognised on a net basis – corresponding to any fee or commission to which the entity expects to be entitled.

Unlike IFRS Accounting Standards, an option existed to present the private motor vehicle and motorcycle tax ('bpm') as part of revenue. As per 2024, DASB had removed this option. The entity receives the bpm as an agent on behalf of the Dutch Tax Authorities; hence, the bpm may no longer be presented as part of revenue, aligning with IFRS Accounting Standards.

Like IFRS Accounting Standards, onerous contracts are accounted for under the provisions standard.

Like IFRS Accounting Standards, contract liabilities and assets are presented in the financial statements.



<p>The revenue standard contains extensive disclosure requirements designed to enable users of the financial statements to understand the nature, amount, timing and uncertainty of revenue and cash flows arising from contracts with customers. There are no exemptions from these disclosure requirements.</p> <p><b>Forthcoming requirements</b></p> <p><a href="#">Construction contracts - disclosure</a></p> <p>IFRS 15 does not separately address 'Construction Contracts' like DAS. There are no forthcoming requirements under IFRS Accounting Standards.</p>	<p>Unlike IFRS Accounting Standards, disclosure requirements are less extensive and include a split of type of revenue (sale of goods, rendering of services, interest, royalties and dividends). The nature of significant performance obligations and the method of allocating revenue to reporting periods, including the method of determining the stage of completion of service contracts, must be disclosed for each significant type of performance obligation. In addition, the total capitalised costs of obtaining a contract shall be disclosed.</p> <p><b>Forthcoming requirements</b></p> <p><a href="#">Construction contracts - disclosure</a></p> <p>The DASB amended the disclosure requirements in RJ 221 <i>Construction Contracts</i> to align with the requirements in RJ 270 <i>The Profit and Loss account</i>. It requires disclosure of the nature of significant performance obligations and for each significant type of performance obligation the methods to recognise project revenues, allocate revenues to reporting periods and determine progress.</p>
<p><b>References:</b> IFRS 15</p>	<p><b>References:</b> RJ 221 (2022), RJ 270 (2022)</p>

## 4.2 Government grants

IFRS Accounting Standards	Dutch GAAP
<p>Government grants are transfers of resources to an entity by a government entity in return for compliance with certain past or future conditions related to the entity's operating activities.</p> <p>Government grants are recognised when there is reasonable assurance that the entity will comply with the relevant conditions and the grant will be received.</p> <p>A forgivable loan is treated as a government grant only when there is reasonable assurance that the entity will meet the terms for forgiveness of the loan. Otherwise, the loan is recognised as a liability in accordance with IFRS 9 <i>Financial Instruments</i>.</p>	<p>Like IFRS Accounting Standards, government grants are transfers of resources to an entity by a government entity in return for compliance with certain past or future conditions related to the entity's operating activities.</p> <p>Like IFRS Accounting Standards, government grants are recognised when there is a reasonable certainty that the entity will comply with the relevant conditions and the grant will be received.</p> <p>Unlike IFRS Accounting Standards, the term financing facilities is used which encompasses a forgivable loan. Like IFRS Accounting Standards, financing facilities shall in principle be ignored upon the recognition of the related credits. Like IFRS Accounting Standards, a financing facility is treated as a government grant only when there is reasonable assurance that the entity will meet the terms for forgiveness of the loan. Otherwise, the loan is recognised as a liability in accordance with RJ 290 <i>Financial instruments</i>.</p>

<p>Government grants shall be recognised in profit or loss on a systematic basis over the periods in which the entity recognises as expenses the related costs for which the grants are intended to compensate.</p> <p>Government grants that relate to the acquisition of an asset, other than a biological asset measured at fair value less costs to sell, are recognised in profit or loss as the related asset is depreciated or amortised.</p> <p>Government grants related to assets, including non-monetary grants at fair value, shall be presented in the statement of financial position either by setting up the grant as deferred income or by deducting the grant in arriving at the carrying amount of the asset.</p> <p>If a government grant is in the form of a non-monetary asset, then both the asset and the grant are recognised either at the fair value of the non-monetary asset or at a nominal amount.</p> <p>Unconditional government grants relating to biological assets measured at fair value less cost to sell are recognised in profit or loss when they are receivable. Conditional grants for such assets are recognised in profit or loss when the required conditions are met.</p> <p>For government loans at a below market interest or interest-free, interest is imputed on these loans.</p> <p>The accounting for a financial guarantee provided by a government depends on whether an economic benefit is transferred and who receives it (i.e. the lender or the borrower).</p> <p>IFRS Accounting Standards do not contain specific accounting requirements for emission rights since the withdrawal of IFRIC 3 <i>Emission Rights</i> in 2004.</p>	<p>Like IFRS Accounting Standards, government grants shall be recognised in profit or loss on a systematic basis over the periods in which the entity recognises as expenses the related costs for which the grants are intended to compensate.</p> <p>Unlike IFRS Accounting Standards, government grants that relate to the acquisition of an asset may be recognised either as a reduction in the cost of the asset or as deferred income that is amortised as the related asset is depreciated or amortised.</p> <p>Like IFRS Accounting Standards, government grants related to assets, including non-monetary grants at fair value, shall be presented in the statement of financial position either by setting up the grant as deferred income or by deducting the grant in arriving at the carrying amount of the asset.</p> <p>Unlike IFRS Accounting Standards, there is no specific guidance for government grants in the form of a non-monetary asset. However, transactions shall be reflected in accordance with the economic reality (economic substance).</p> <p>Unlike IFRS Accounting Standards, no specific guidance is available for government grants relating to biological assets. They are accounted for under the general requirements for government grants.</p> <p>Like IFRS Accounting Standards, interest is imputed on low-interest or interest-free loans from a government. Unlike IFRS Accounting Standards, RJ 274 does not mention guarantees. Like IFRS Accounting Standards, for assistance to meet the definition of a government grant, the government should transfer an economic benefit.</p> <p>Unlike IFRS Accounting Standards, the RJ 274 Annex contains guidance on the accounting for emission rights including those received for no consideration from the government for own use. This Annex sets out two variants for the treatment of these emission rights and the associated obligations.</p>
<p><b>References:</b> IAS 20, IAS 41, SIC-10</p>	<p><b>References:</b> RJ 274</p>

### 4.3 Employee benefits

IFRS Accounting Standards	Dutch GAAP
IFRS Accounting Standards specify accounting requirements for all types of employee benefits, and not just pensions. Liabilities for employee benefits are recognised on the basis of a legal or constructive obligation.	Like IFRS Accounting Standards, accounting requirements are specified for all types of employee benefits, and not just pensions.
Employee benefits are all forms of consideration given by an entity in exchange for service rendered by employees or for the termination of employment.	Like IFRS Accounting Standards, liabilities for employee benefits are recognised on the basis of a legal or constructive obligation.
Share based payments are dealt with in a separate standard (chapter 4.4).	Like IFRS Accounting Standards, employee benefits are all forms of consideration given by an entity in exchange for service rendered by employees or for the termination of employment.
Short-term employee benefits are employee benefits that are <i>expected</i> to be settled wholly within 12 months of the end of the period in which the services have been rendered and are accounted for using normal accrual accounting.	Like IFRS Accounting Standards, share based payments are dealt with in a separate standard (chapter 4.4).
Other long-term employee benefits are all employee benefits other than short-term benefits, post-employment benefits and termination benefits.	Unlike IFRS Accounting Standards, for remunerations payable during the employment there is no distinction made between short-term employee benefits and (other) long-term employee benefits. As such, more types of employee benefits may fall under short-term employee benefits (remunerations during the employment), i.e. the liability relating to holidays not taken.
The expense for other long-term employee benefits, calculated on a discounted basis, is usually accrued over the service period. The computation is similar to defined benefit plans.	Like IFRS Accounting Standards, liabilities and expenses for employee benefits during the employment are generally recognised as an expense in the period in which the employee renders the service.
There are no provisions with respect to insured disability risks. A provision for insured disability risks would generally not be allowed.	Unlike IFRS Accounting Standards, for remunerations payable during the employment there is no distinction made between short-term employee benefits and (other) long-term employee benefits.
Post-employment benefits are employee benefits that are payable after the completion of employment (before or during retirement).	Unlike IFRS Accounting Standards, for specific types of accrued conditional rights, such as long-service awards, a liability is recognised based on a best estimate of the amounts which are necessary in order to settle the liability on the balance sheet date.
A defined contribution plan is a post-employment benefit plan under which the employer pays fixed contributions into a separate entity and has no further obligations. All other post-employment plans are defined benefit plans.	Unlike IFRS Accounting Standards, a provision may be recognised, insofar as the risk of disability is insured, for the part of the insurance premiums to be paid in the future that can be directly allocated to the individual claim history of the legal entity. As an alternative recognition method, it is permitted only to account for such premiums in the period(s) during which they are payable.
	Like IFRS Accounting Standards, post-employment benefits are employee benefits that are payable after the completion of employment (before or during retirement).
	Unlike IFRS Accounting Standards, (which incorporates the actuarial risk-based approach), Dutch GAAP is based on a liability approach.

Contributions to a defined contribution plan are accounted for on an accrual basis.

Accounting for defined benefit plans involves the following steps:

- determining the present value of the defined benefit; obligation by applying an actuarial valuation method;
- deducting the fair value of any plan assets;
- adjusting the amount of the deficit or surplus for any effect of limiting a net defined benefit asset to the asset ceiling; and
- determining service costs, net interest and remeasurements of the net defined benefit liability (asset).

The projected unit credit method is used to determine the present value of the defined benefit obligation and the related current service cost and, if applicable, any past service cost.

There is no specific guidance on the application of defined benefit accounting to plans that would be defined contribution plans except that they contain minimum benefit guarantees. In our view, a minimum benefit guarantee causes a plan to be a defined benefit plan.

Multi-employer plans are post-employment plans that pool the assets contributed by various entities that are not under common control to provide benefits to employees of more than one entity. Such plans are classified as defined contribution or defined benefit plans following the above definitions. However, if insufficient information is available to permit defined benefit accounting, then the plan is treated as a defined contribution plan and additional disclosures are required.

If defined contribution plan accounting is applied to a multi-employer defined benefit plan and there is an agreement that determines how a surplus in the plan would be distributed or a deficit in the plan funded, then an asset or liability that arises from the contractual agreement is recognised.

If insufficient information is available for a multi-employer defined benefit plan to be accounted for as a defined benefit plan, then it is treated as a defined contribution plan, except that:

- an asset or liability for any surplus or deficit is recognised if there is a contractile agreement that determines how a surplus in the plan would be distributed or a deficit in the plan funded; and
- additional disclosures are required.

Under Dutch GAAP, contributions are expensed as the obligation to make the payments is incurred. However, if an employer has an additional (legal or constructive) obligation to pay further contributions, for example, to fund deficits or to pay for unconditional indexation, a liability for that obligation should be recognised on the balance sheet. This liability is measured at the best estimate of the outflow of resources to settle the obligation and all changes are recognised in the income statement.

Consequently, unlike IFRS Accounting Standards, Dutch GAAP does not distinct between defined contribution plans and defined benefit plans. However, if there is no additional obligation, accounting for the pension plan is similar to the IFRS accounting of defined contribution plans.

Dutch GAAP, however, alternatively provides the option to consistently apply the full requirements of IFRS or US GAAP for the accounting of pension plans to:

- all pension plans of the company; or
- (only) the foreign pension plans that are not comparable with Dutch pension plans.

Unlike IFRS Accounting Standards, there are no specific rules for employer plans, multi-employer plans and insured benefit plans, although the occurrence of an additional liability differs between those plans.



To qualify as plan assets, assets need to meet specific criteria, including a requirement that they be unavailable to the entity's creditors (even in bankruptcy).

Insurance policies issued to the sponsor meet the definition of plan assets if they are issued by a party unrelated to the entity and meet certain other criteria.

Insurance policies issued to the plan by the reporting entity meet the definition of plan assets if they are transferable and meet certain other criteria.

Assets that meet the definition of plan assets, including qualifying insurance policies, and the related liabilities are presented on a net basis in the statement of financial position.

If a defined benefit plan is in surplus, then the amount of any net asset recognised is limited to the present value of any available economic benefits in the form of refunds from the plan or the reductions in future contributions to the plan (the 'asset ceiling').

Minimum funding requirements to cover existing shortfalls give a rise to a liability if payments under the requirement would create a surplus in excess of the asset ceiling.

Actuarial gains or losses which arise from changes in the present value of obligation of the defined benefit plans are recognised immediately in other comprehensive income (OCI) in the period during which they arise. 'Corridor approach' is not allowed under IFRS Accounting Standards.

All past service costs of defined benefit plans, including unvested amounts, are recognised immediately in profit or loss.

Benefits are attributed to periods of service in accordance with the plan's benefit formula unless that formula is back-end loaded, in which case straight-line attribution is used instead.

Curtailments and other plan amendments are recognised at the same time as related restructurings or related termination benefits occur, when these occur before the curtailments or other plan amendments.

Termination benefits are employee benefits provided as a result of either an entity's decision to terminate an employee's employment before the normal retirement date or an employee's decision to accept an offer of benefits in exchange for the termination of employment.

Unlike IFRS Accounting Standards, there is no 'plan asset' concept as Dutch GAAP applies a liability approach which fundamentally differs from defined benefit plan accounting under the IAS 19 actuarial risk approach.

Unlike IFRS Accounting Standards, termination benefits are only benefits that are granted to an employee in exchange for the termination of the employment.

A termination benefit is recognised at the earlier on the date on which the entity recognises cost for a restructuring that includes the payment of termination benefits and the date on which the entity can no longer withdraw the offer of the termination benefits.

A restructuring provision (including termination benefits) is recognised once the restructuring plan and details of the restructuring have been communicated to those affected and a valid expectation by those affected has arisen (chapter 3.10).

### Forthcoming requirements

#### Vitality schemes

There are no forthcoming requirements under IFRS Accounting Standards.

#### References:

IAS 19, IFRIC 14, IAS 37

Like IFRS Accounting Standards, a termination benefit is recognised at the earlier on the date on which the entity recognises cost for a restructuring that includes the payment of termination benefits and the date on which the entity can no longer withdraw the offer of the termination benefits.

Like IFRS Accounting Standards, restructuring costs (including termination benefits) are not recognised until the restructuring plan has been communicated to the affected employees. However, unlike IFRS Accounting Standards, a liability may be recognised (accounting policy choice) if the communication occurs after the balance sheet date but before the financial statements are prepared (authorised for issue), (chapter 3.10).

### Forthcoming requirements

#### Vitality schemes

The DASB includes amendments in RJ 271 *Employee Benefits* for vitality, early retirement and pension schemes. The main changes in relation to the two former schemes are clarifications and examples, and include guidance when such schemes lead to an accrual of rights (provision) or no accrual of rights (no provision).

In the context of the Wet Toekomst Pensioenen ('WTP') the DASB has made changes to paragraph 3 'Pensions' of Standard 271 *Employee Benefits*. The amended paragraph of Standard 271 applies to all pensions schemes that are accounted for in accordance with Dutch accounting rules (i.e. not when IAS 19 *Employee Benefits* or US GAAP is applied). This includes both schemes drawn up under the Pensions Act (PW) applicable until 1 July 2023 and schemes drawn up under the WTP. The changes clarify the (possible) impact of the WTP on the accounting for pension liabilities.

#### References:

RJ 271, RJ 252

#### 4.4 Share-based payments

IFRS Accounting Standards	Dutch GAAP
<p>Goods or services received in a share-based payment transaction are measured using a fair value-based measure.</p> <p>An intrinsic value approach is permitted only in the rare circumstance that the fair value of the equity instruments cannot be estimated reliably.</p> <p>Goods are recognised when they are obtained and services are recognised over the period they are received.</p> <p>Equity-settled transactions with employees are generally measured based on the fair value on the grant date of the equity instruments granted.</p> <p>'Grant date' is the date on which the entity and the employee have a shared understanding of the terms and conditions of the arrangement.</p> <p>Equity-settled transactions with non-employees are generally measured based on the fair value of the goods or services obtained. The measurement date is the date on which the goods or services are received, which means that there may be multiple measurement dates.</p> <p>For equity-settled transactions an entity recognises a cost and a corresponding increase in equity. The cost is recognised as an expense unless it qualifies for recognition as an asset.</p> <p>For cash-settled transactions, an entity recognises a cost and a corresponding liability. The cost is recognised as an expense unless it qualifies for recognition as an asset.</p>	<p><i>General – note that Dutch GAAP (RJ 275) is to a large extent in line with IFRS 2 but provides less detailed guidance and contains an additional measurement alternative</i></p> <p>Unlike IFRS, Dutch GAAP provides an accounting policy choice for the measurement of the services received in employee share-based plans: (a) fair value of the award or (b) intrinsic value of the reward.</p> <p>Like IFRS, goods should be recognised when they are obtained and services recognised over the period they are received.</p> <p>Like IFRS, equity-settled grants to employees generally are measured based on the value of the instruments issued at grant date. However, as stated, unlike IFRS, this value could be intrinsic value or fair value.</p> <p>Like IFRS, equity-settled share option grants to employees are not remeasured for subsequent changes in value. However, unlike IFRS, equity-settled share option grants to employees are remeasured at each reporting date and the date of settlement, when measured at intrinsic value.</p> <p>The grant date is interpreted similarly to IFRS.</p> <p>Like IFRS, share-based payments to non-employees are measured based on the fair value of the goods and services received, unless the fair value cannot be measured reliably.</p> <p>Like IFRS, for equity-settled transactions an entity recognises a corresponding increase in equity. The cost is recognised as an expense unless it qualifies for recognition as an asset.</p> <p>Like IFRS, for cash-settled transactions, an entity recognises a cost and a corresponding liability. The cost is recognised as an expense unless it qualifies for recognition as an asset. However, unlike IFRS, the value of the liability depends on the measurement option chosen (fair value versus intrinsic value).</p>



The liability for cash-settled transactions is remeasured until settlement date for subsequent changes in the fair value of liability. The remeasurements are recognised in profit or loss and are not eligible for capitalisation.

IFRS 2 makes a distinction in the conditions associated with share-based payments between 'vesting conditions' and 'non-vesting conditions'. Vesting conditions are related to services provided by the employee, non-vesting conditions are not. Vesting conditions comprise 'service conditions' and 'performance conditions', the latter of which shall be subdivided into 'market conditions' (price-related conditions) and 'non-market conditions' (performance-related conditions). The distinguished categories of conditions have an impact on the measurement of share-based payments.

Market conditions are reflected in the measurement of the fair value of share-based payment transactions. There is no true-up if the expected and actual outcomes differ because of market conditions.

Like IFRS, cash-settled transactions are remeasured at each balance sheet date and at the settlement date for subsequent changes in the fair value of liability. The remeasurements are recognised in profit or loss.

Unlike IFRS, RJ 275 only has the categories of performance-related conditions and price-related conditions. Service conditions are considered part of performance-related conditions.

This means that 'non-vesting conditions' must be classified in one of the two categories. Like IFRS, the distinguished categories of conditions have an impact on the measurement of share-based payments.

Like IFRS, market conditions for equity-settled transactions are reflected in the initial measurement of fair value. There is no true-up if the expected and actual outcomes differ because of market conditions.



Like market conditions, non-vesting conditions are reflected in the measurement of fair value and there is no subsequent true up for differences between the expected and the actual outcome.

Service and non-market performance conditions are not reflected in the measurement of the fair value of share-based payment transactions but are considered in estimating the number of instruments that are expected to vest. Initial estimates of the number of instruments that are expected to vest are adjusted to current estimates and on vesting date to the actual number of instruments that ultimately vest.

Modification of an equity-settled share-based payment results in the recognition of any incremental fair value but not in any reduction in fair value. Replacements are accounted for as modifications.

When an entity modifies a cash-settled share-based payment transaction such that it becomes equity-settled, it measures the equity-settled award at its fair value and recognises any gain or loss in profit or loss.

Cancellation of a share-based payment results in accelerated recognition of any unrecognised cost.

Classification of grants in which the entity has the choice of equity or cash settlement depends on whether the entity has the ability and intent to settle in shares.

Grants in which the employee has the choice of equity or cash settlement are accounted for as compound instruments. Therefore, the entity accounts for a liability component and an equity component separately.

Awards with graded vesting, for which the only vesting condition is service, are accounted for as separate share-based payment arrangements.

There is specific guidance on group share-based payment arrangements, which are accounted for in each group entity's financial statements based on their own perspectives.

**References:**  
IFRS 2

Unlike IFRS, non-vesting conditions are not separately distinguished and might be accounted for in the same manner as a market condition i.e. reflected in the measurement of fair value or treated similar to a performance-related condition.

Like IFRS, changes in non-market based conditions ('performance-related') are not taken into account in the value at grant date, but instead lead to changes in the estimate of the number of options that will vest (forfeitures). Like IFRS, estimates of the number of equity-settled instruments that vest are adjusted to the actual numbers that vest.

Like IFRS, modification of an equity-settled share-based payment results in the recognition of any incremental fair value but not in any reduction in fair value. Replacements are accounted for as modifications.

Like IFRS, cancellation of a share-based payment results in accelerated recognition of any unrecognised cost.

Like IFRS, classification of grants in which the entity has the choice of equity or cash settlement depends on whether it involves a constructive obligation for settlement in cash and cash equivalents.

Unlike IFRS, grants in which the employee has the choice of equity or cash settlement can be treated as a compound instrument or a cash-settled transaction.

Like IFRS, Dutch GAAP does not contain stipulations about the accounting for awards with graded vesting for which the only condition is service. In our view, treatment comparable to IFRS 2 seems acceptable.

Unlike IFRS, there is no specific guidance on group share-based payments. It is permitted not to apply RJ 275. In our view, treatment comparable to IFRS 2 would be also acceptable.

**References:**  
RJ 275

## 5 Special topics

### 5.1 Leases

IFRS Accounting Standards	Dutch GAAP
The standard applies to leases of property, plant and equipment and other assets, with limited exclusions.	<i>Dutch GAAP allows the application of IFRS 16 instead of RJ 292, when it is applied integrally and consistently. Only when the entity elects IFRS 16, no difference in accounting is expected.</i>
If an underlying asset of a lease would meet the definition of investment property, the right-of-use asset is accounted for in accordance with IAS 40. The lease liability is accounted for in accordance with IFRS 16.	Like IFRS Accounting Standards, an entity applies the investment property standard RJ 213 to account for a right-of-use asset if the underlying asset would otherwise meet the definition of investment property.
A contract is or contains a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.	However, unlike IFRS Accounting Standards, a right of use in a property that classifies as operating lease for a lessee (for example land in leasehold) can be recorded by the lessee as an investment property if and insofar this right of use regarding this property fulfils the definition of an investment property and the lessee applies the current value as the measurement basis. Accordingly, RJ 213 <i>Investment property</i> will apply.
Lessees apply a single on-balance sheet lease accounting model, except for leases to which they elect to apply the recognition exemptions for short-term leases or leases of low-value assets.	Like IFRS Accounting Standards, a contract is or contains a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.
Short-term leases and leases of a low-value asset are not required to be recognised on-balance by the lessee. The related lease payments are recognised on a straight-line basis.	Unlike IFRS Accounting Standards, a lessee classifies a lease as either a finance lease or operating lease. The lease classification depends on whether substantially all of the risks and rewards incidental to ownership of a leased asset have been transferred from the lessor to the lessee.
In determining what lease payments should be included in the lease liability, any renewal and termination options in the contract should be considered.	Unlike IFRS Accounting Standards, there are no exemptions for short-term leases or leases of low-value assets.

A lessee recognises a right-of-use asset representing its right to use the underlying asset and a lease liability at the present value of the lease payments made during the lease term.

After initial recognition, a lessee measures the lease liability at amortised cost using the effective interest method. The lease liability is also remeasured to reflect lease modifications and changes in the lease payments, including changes caused by a change in an index or rate.

A lessee measures the right-of-use asset at cost less accumulated depreciation and accumulated impairment losses, except when it applies the alternative measurement models for revalued assets and investment property.

Lessors classify leases as either finance or operating leases.

Lease classification is made at inception of the lease (i.e. the earlier of the date of a lease agreement and the date of commitment by the parties to the principal terms and conditions of the lease) and is reassessed only if there is a lease modification. The classification depends on whether substantially all of the risks and rewards incidental to ownership of the underlying asset have been transferred, based on the substance of the arrangement.

Under a finance lease, a lessor derecognises the underlying asset and recognises a finance lease receivable. A manufacturer or dealer lessor recognises the selling margin in a finance lease by applying its normal accounting policy for outright sales.

Under an operating lease, the lessor recognises the lease payments as income over the lease term, generally on a straight-line basis. The lessor recognises the underlying asset in its statement of financial position.

A 'lease modification' is a change in the scope of a lease, or the consideration for a lease, that was not part of the original terms and conditions of the lease – e.g. adding or terminating the right to use one or more underlying assets.

Unlike IFRS Accounting Standards, a lessee recognises a lease asset and a lease liability under a finance lease at the lower of the underlying asset's fair value or the present value of the lease payments made during the lease term.

Unlike IFRS Accounting Standards, any lease payments under an operating lease are recognised as an expense on a straight-line basis over the lease term.

Like IFRS Accounting Standards, after initial recognition, a lessee under a finance lease measures the lease liability at amortised cost using the effective interest method.

Unlike IFRS Accounting Standards, there is no specific guidance on lease modifications and remeasurement.

Like IFRS Accounting Standards, a lessee measures the leased asset under a finance lease at cost less accumulated depreciation and accumulated impairment losses, except when it applies the alternative measurement models for revalued assets and investment property.

Like IFRS Accounting Standards, lessors classify leases as either a finance lease or operating lease.

Like IFRS Accounting Standards, the lease classification is made at inception of the lease and is not revised unless the lease agreement is modified. The lease classification depends on whether substantially all of the risks and rewards incidental to ownership of a leased asset have been transferred from the lessor to the lessee.

Like IFRS Accounting Standards, under a finance lease, a lessor derecognises the underlying asset and recognises a finance lease receivable. A manufacturer or dealer lessor recognises the selling margin in a finance lease by applying its normal accounting policy for outright sales.

Like IFRS Accounting Standards, under an operating lease, the lessor recognises the lease payments as income over the lease term, generally on a straight-line basis. The lessor recognises the underlying asset in its statement of financial position.

Unlike IFRS Accounting Standards, there is no specific guidance under Dutch GAAP. From the general guidance it can be derived that if there is no change in lease classification the existing lease (accounting) will be continued. In our view, any modified cash flows would be accounted for as a change in accounting estimate and, therefore, recognised prospectively.

In a sale-and-leaseback transaction, the seller-lessee first determines if the buyer-lessor obtains control of the asset based on the revenue standard (see 4.1). Then the analysis on the recognition of the immediate gain can be made. If not, then the transaction is accounted for as a financing arrangement.

If the transaction qualifies for sale accounting, then:

- the buyer-lessor recognises the underlying asset and applies the lessor accounting model to the leaseback; and
- the seller-lessee derecognises the underlying assets and applies the lessee accounting model to the leaseback.

The seller-lessee measures the right-of-use asset at the related portion of the previous carrying amount (i.e. at cost). It recognises only the amount of any gain or loss related to the rights transferred to the lessor-buyer.

In a sub-lease, the original lessee / intermediate lessor accounts for the head lease and the sub-lease as two separate contracts. An intermediate lessor classifies a sub-lease as a finance or as an operating lease with reference to the right-of-use asset arising from the head lease.

The payments for the lease in a sale-and-leaseback transaction may be variable and not based on an index or a rate. In these cases, a seller-lessee measures the right-of-use asset arising from the leaseback and determines the amount of any gain or loss on sale to be recognised on the transaction date.

The seller-lessee measures the right-of-use asset as a proportion of the previous carrying amount of the sold asset. It also exceptionally recognises a lease liability representing the variable lease payments that are not based on an index or a rate.

In a sub-lease, the original lessee / intermediate lessor accounts for the head lease and the sub-lease as two separate contracts. An intermediate lessor classifies a sub-lease as a finance or as an operating lease with reference to the right-of-use asset arising from the head lease.

**References:**  
IFRS 16

Unlike IFRS Accounting Standards, immediate gain recognition from the sale and leaseback of an asset is dependent upon whether the leaseback is classified as finance or an operating lease and, if the leaseback is an operating lease, whether the sale takes place at fair value ('true sale').

Unlike IFRS Accounting Standards, RJ 292 does not explicitly provide guidance on sale-and-leaseback transactions with variable lease payments that are not based on an index or a rate.

Like IFRS Accounting Standards, in a sub-lease, the original lessee / intermediate lessor accounts for the head and the sub-lease as two separate contracts. Unlike IFRS Accounting Standards, there is no specific guidance whether the sub-lessor should assess the lease classification by reference to the underlying asset or the lease asset.

**References:**  
RJ 115, RJ 292, RJ-Uiting 2020-12, 2021-9



## 5.2 Operating segments

IFRS Accounting Standards	Dutch GAAP
<p>Segment disclosures are required by entities whose debt or equity instruments are traded in a public market or that file, or are in the process of filing, their financial statements with a securities commission or other regulatory organisation for the purpose of issuing any class of instruments in a public market.</p> <p>Segment disclosures are provided about the components of the entity that management monitors in making decisions about operating matters (the 'management approach').</p> <p>An 'operating segment' is a component of an entity:</p> <ul style="list-style-type: none"> <li>• that engages in business activities from which it may earn revenues and incur expenses;</li> <li>• whose operating results are reviewed regularly by the CODM; and</li> <li>• for which discrete information is available.</li> </ul> <p>Such components (operating segments) are identified on the basis of internal reports that the entity's Chief Operating Decision Maker (CODM) regularly reviews in allocating resources to segments and in assessing their performance.</p> <p>The aggregation of operating segments is permitted only when the segments have 'similar' economic characteristics and meet a number of other specified criteria.</p> <p>Reportable segments are identified based on quantitative thresholds of revenue, profit or loss, or total assets.</p> <p>The amounts disclosed for each reportable segment are the measures reported to the CODM, which are not necessarily based on the same accounting policies as the amounts recognised in the financial statements.</p> <p>As part of the disclosure, an entity reports a measure of profit or loss for each reportable segment and, if reported to the CODM, a measure of the total assets and liabilities for each reportable segment.</p>	<p>The legal provisions in Title 9 concerning segment information are limited to (a) the net turnover and (b) the (average) number of employees.</p> <p>The legal requirements under (b) shall apply to all companies. The requirements under (a) shall exclusively apply to large, non-listed companies and shall be provided by line of business and individual geographical area as numerical information. The amounts shall reconcile with the revenue in the income statement. Companies may choose to exclusively provide the legally required segment information.</p> <p>RJ 350 has further provisions relating to additional segment information (in comparison with the law) that are recommended if the company (on a voluntary basis) discloses additional segment information in its financial statements.</p> <p>The RJ 350 provisions on additional segment information are derived from IFRS 8 <i>Operating Segments</i>.</p> <p>Additional segment information disclosed in the financial statements shall be derived from the internal information regarding 'operating segments' presented to the management board.</p>

<p>Disclosures are required for additions to non-current assets, with certain exceptions.</p> <p>Reconciliations between total amounts for all reportable segments and financial statement amounts are disclosed with a description of reconciling items.</p> <p>IFRIC confirmed that specified amounts included in the measure of profit or loss for each reportable segment are required to be disclosed if they are:</p> <ul style="list-style-type: none"> <li>• included in the measure of segment profit or loss reviewed by the CODM, even if they are not separately provided to or reviewed by the CODM; or</li> <li>• regularly provided to the CODM, even if they are not included in the measure of segment profit or loss.</li> </ul> <p>If a CODM uses multiple measures to evaluate segment performance, then an entity reports the measure that is most consistent with the principles used in the financial statements (i.e. IFRS Accounting Standards). here is no explicit guidance in IFRS Accounting Standards on whether an entity can report multiple measures of a segment's profit or loss if the CODM uses more than one measure to evaluate segment performance and allocate resources.</p> <p>General and entity-wide disclosures include information about products and services, geographical areas, major customers and factors used to identify an entity's reportable segments and the judgements made by management in applying the aggregation criteria. Such disclosures are required even if an entity has only one segment.</p> <p>Comparative information is normally revised for changes in reportable segments.</p> <p>In determining the material items of income and expense to be disclosed for each reportable segment, an entity considers:</p> <ul style="list-style-type: none"> <li>• the objective of the accounting standard and whether information about an item is material in the context of its financial statements taken as a whole because of its size or nature, or a combination of both;</li> <li>• the requirements on aggregation of information; and</li> <li>• circumstances that give rise to separate disclosure.</li> </ul>	<p>Unlike IFRS Accounting Standards, the DASB did not confirm when specified amounts are required to be disclosed.</p> <p>Unlike IFRS Accounting Standards, no specific guidance is provided on scenarios in which a CODM uses multiple measures to evaluate segment performance.</p> <p>Like IFRS Accounting Standards, general and entity-wide disclosures include information about products and services, geographical areas, major customers and factors used to identify an entity's reportable segments and the judgements made by management in applying the aggregation criteria. Such disclosures are required even if an entity has only one segment.</p> <p>Like IFRS Accounting Standards, comparative information is normally revised for changes in reportable segments.</p> <p>Unlike IFRS Accounting Standards, the DASB did not clarify the 'material items' to be disclosed.</p>
<p><b>References:</b> IFRS 8</p>	<p><b>References:</b> Article 380, 382 DCC, RJ 350</p>

### 5.3 Earnings per share

IFRS Accounting Standards	Dutch GAAP
<p>Basic and diluted earnings per share (EPS) are presented by entities whose ordinary shares or potential ordinary shares are traded in a public market or that file, or are in the process of filing, their financial statements for the purpose of issuing any class of ordinary shares in a public market.</p>	<p>Unlike IFRS Accounting Standards, presentation of basic and diluted earnings per share (EPS) is not required for entities applying Dutch GAAP. The following EPS disclosures apply to entities that present EPS information on a voluntary basis.</p>
<p>Basic and diluted EPS for both continuing operations and profit or loss are presented in the statement of profit or loss and OCI, with equal prominence for each class of ordinary shares that has a differing right to share in the profit or loss for the period.</p>	<p>Like IFRS Accounting Standards, basic and diluted EPS are presented on the face of the income statement with equal prominence. However, unlike IFRS Accounting Standards, there is no requirement to present EPS for continuing and discontinuing operations separately, or to disclose EPS for each class of ordinary share.</p>
<p>Separate EPS information is disclosed for discontinued operations, either in the statement of comprehensive income or in the notes to the financial statements.</p>	<p>Unlike IFRS Accounting Standards, there is no requirement to present EPS for discontinued operations.</p>
<p>Basic EPS is calculated by dividing the profit or loss attributable to holders of ordinary equity of the parent by the weighted average number of ordinary shares outstanding during the period.</p>	<p>Like IFRS Accounting Standards, basic EPS is calculated by dividing the earnings attributable to holders of ordinary equity of the parent by the weighted average number of ordinary shares outstanding during the period.</p>
<p>To calculate diluted EPS, profit or loss attributable to ordinary equity holders and the weighted average number of shares outstanding are adjusted for the effects of all dilutive potential ordinary shares.</p>	<p>Like IFRS Accounting Standards, to calculate diluted EPS, profit or loss attributable to ordinary equity holders and the weighted number of shares outstanding are adjusted for the effects of all dilutive potential ordinary shares.</p>
<p>Potential ordinary shares are considered dilutive only if they decrease EPS or increase loss per share from continuing operations. In determining whether potential ordinary shares are dilutive or anti-dilutive, each issue or series of potential ordinary shares is considered separately, rather than in aggregate.</p>	<p>Unlike IFRS Accounting Standards, potential ordinary shares are considered dilutive only if they decrease EPS or increase loss per share from ordinary activities (including discontinued operations). Like IFRS Accounting Standards, in determining whether potential ordinary shares are dilutive or anti-dilutive, each issue or series of potential ordinary shares is considered separately, rather than in aggregate.</p>
<p>Contingently issuable ordinary shares are included in basic EPS from the date on which all necessary conditions are satisfied. When they are not yet satisfied, such shares are included in diluted EPS based on the number of shares that would be issuable if the reporting date were the end of the contingency period.</p>	<p>Like IFRS Accounting Standards, contingently issuable ordinary shares are included in basic EPS from the date when all necessary conditions are satisfied, and, when not yet satisfied, in diluted EPS to the extent that the conditions are met at the reporting date.</p>
<p>If a contract may be settled in either cash or shares at the entity's option, then the presumption is that it will be settled in ordinary shares and the resulting potential ordinary shares are used to calculate diluted EPS.</p>	<p>Like IFRS Accounting Standards, when a contract may be settled in either cash or shares at the entity's option it is treated as a potential ordinary share.</p>
<p>If a contract may be settled in either cash or shares at the holder's option, then the more dilutive of cash and share settlement is used to calculate diluted EPS.</p>	<p>Unlike IFRS Accounting Standards, if a contract may be settled in either shares or another form at the holder's option, then, regardless of the option, the maximum number of shares to be issued is regarded as potential ordinary shares to calculate diluted EPS.</p>



<p>For diluted EPS, diluted potential ordinary shares are determined independently for each period presented.</p>	<p>Unlike IFRS Accounting Standards, no guidance is provided on the determination of the number of dilutive potential ordinary shares for each period presented.</p>
<p>IFRS Accounting Standards has provisions on how to treat potentially dilutive effects on rights issued by a group company, joint venture or associate that can be converted into shares of the parent. Furthermore, there are provisions regarding the way the calculation of diluted earnings per share shall treat employee options.</p>	<p>Unlike IFRS Accounting Standards, there are no such provisions for a group company, joint venture or associate or for treatment of employee options.</p>
<p>When the number of ordinary shares outstanding changes, without a corresponding change in resources, the weighted average number of ordinary shares outstanding during all periods presented is adjusted retrospectively for both basic and diluted EPS.</p>	<p>Like IFRS Accounting Standards, when the number of ordinary shares outstanding changes, without a corresponding change in resources, the weighted average number of ordinary shares outstanding during all periods presented is adjusted.</p>
<p>Adjusted basic and diluted EPS based on alternative earnings measures may be disclosed and explained in the notes to the financial statements.</p>	<p>Like IFRS Accounting Standards, adjusted basic and diluted EPS based on alternative earnings measures may be disclosed and explained in the notes to the financial statements.</p>
<p><b>References:</b> IAS 33</p>	<p><b>References:</b> CC, RJ 340</p>



## 5.4 Non-current assets held for sale and discontinuing operations

IFRS Accounting Standards	Dutch GAAP
<p>Non-current assets and some groups of assets and liabilities ('disposal groups') are classified as held for sale when their carrying amounts will be recovered principally through sale and specific criteria are met.</p> <p>Non-current assets and some groups of assets and liabilities ('disposal groups') are classified as held for distribution when the entity is committed to distributing the asset or disposal group to its owners.</p> <p>Non-current assets and disposal groups held for sale are measured at the lower of their carrying amount and fair value less costs to sell and are presented separately in the statement of financial position.</p> <p>Assets held for sale or distribution are not amortised or depreciated.</p> <p>The classification, presentation and measurement requirements that apply to items that are classified as held for sale are also applicable to a non-current asset or disposal group that is classified as held for distribution.</p> <p>The comparative statement of financial position is not re-presented when a non-current asset or disposal group is classified as held for sale.</p> <p>A 'discontinued operation' is a component of an entity that either has been disposed or is classified as held for sale.</p> <p>The presentation of an operation as a discontinued operation is limited to a component of an entity that either has been disposed of, or is classified as held for sale, and:</p> <ol style="list-style-type: none"> <li>represents a separate major line of business or geographic area of operations;</li> <li>is part of a coordinated single plan to dispose of a separate major line of business or geographic area of operations; or</li> <li>is a subsidiary acquired exclusively with a view to resale.</li> </ol>	<p>Unlike IFRS Accounting Standards, there is no accounting concept of non-current assets or disposal groups held for sale or held for distribution.</p> <p>Such assets, and related liabilities, are accounted for under the regular measurement requirements for those items, as Dutch GAAP has no specific rules for 'held for sale' criteria like IFRS Accounting Standards.</p> <p>Unlike IFRS Accounting Standards, assets held for sale or distribution continue to be amortised or depreciated. Only intangible fixed assets that are retired from active use and are held for disposal do not need to be amortised any further. Instead, these assets should be tested for impairment, at least, at each balance sheet date.</p> <p>Unlike IFRS Accounting Standards, there is no accounting concept of non-current assets or disposal groups held for sale or held for distribution. Such assets, and related liabilities, are presented in accordance with the regular presentation requirements for assets and liabilities.</p> <p>Unlike IFRS Accounting Standards, the accounting concept of 'held for sale' is not a criterion to assess whether an operation is a discontinued operation.</p> <p>Unlike IFRS Accounting Standards, a discontinued operation is an operation not being continued in the long term and this is defined as a component of an entity that:</p> <ol style="list-style-type: none"> <li>as a result of a set plan, the entity will: <ul style="list-style-type: none"> <li>dispose of in full or virtually in full, for example as a result of a single sales transaction, a demerger or transfer of ownership, or</li> <li>dispose of in sections, for example, by the sale of individual assets or the settlement of individual liabilities of the component, or</li> <li>wind up or close;</li> </ul> </li> <li>represents a separate major line of business or that supplies goods or services in a separate major geographical area or to a separate major group of customers; and</li> <li>can be clearly distinguished operationally and for financial reporting purposes.</li> </ol>

There is a 'discontinued operation' at the moment on which the business operation is divested or meets all 'held for sale' criteria. These criteria are:

- The business operation shall be available for immediate sale in its present condition, taking into account the 'normal' conditions for such sales.
- The sale shall have a high degree of probability. This means that there must be a sale plan that the management is committed to, that a buyer shall be actively sought, and that the sale price shall be reasonable in comparison to the current fair value of the business operation to be divested.
- Based on the actions to be carried out, it is unlikely that significant changes will be made to the sale plan.
- The sale shall be expected to be completed within one year.

Discontinued operations are presented separately in the statement of profit or loss and OCI, and related cash flow information is disclosed.

Entities that were exclusively acquired with a view to subsequent disposal or held for sale in the near future, will be consolidated. They are classified as held for sale if they meet the relevant criteria.

The comparative statement of profit or loss and OCI and cash flow information is re-presented for discontinued operations.

**References:**  
IFRS 5, IFRIC 17

Unlike IFRS Accounting Standards, an operation is discontinued when the earlier of the following events occurs: (i) the entity has entered into a binding sale agreement; or (ii) the entity's governing body has both approved a detailed, formal plan for discontinuance and has made an announcement of that plan.

Like IFRS Accounting Standards, the results of discontinued operations are presented separately on the face of the income statement, and related cash flow information is disclosed. However, unlike IFRS Accounting Standards, an analysis of the results and cash flows is presented either on the face of the income statement and the cash flow statement or in the notes to the financial statements.

Like IFRS Accounting Standards, a subsidiary acquired exclusively with a view to resale is only classified as held for sale if they meet the relevant criteria. Article 407.1 of DCC, offers a consolidation exemption when certain additional criteria are met.

Like IFRS Accounting Standards, comparative information is re-presented for discontinued operations.

**References:**  
RJ 121, RJ 210, RJ 212, RJ 345

## 5.5 Related party disclosures

IFRS Accounting Standards	Dutch GAAP
Related party relationships are those involving control (direct or indirect), joint control or significant influence. Investments involving joint control or significant influence also create related party relationships.	Like IFRS, related party relationships include those between entities when direct or indirect control exists, for example, subsidiaries, parents and entities under common control. Investments involving joint control or significant influence also create related party relationships.
Key management personnel and their close family members are parties related to an entity.	Like IFRS, key management, including directors and their close family members, also are related parties.
Key management personnel are those persons who have the authority and responsibility for planning, directing and controlling the activities of the entity (directly or indirectly). The definition of key management personnel includes directors (both executive and non-executive).	Unlike IFRS, key management personnel are limited to 'bestuurders en commissarissen' (statutory management board members and supervisory board members).
There are no special recognition or measurement requirements for related party transactions.	Like IFRS, there are no special recognition or measurement requirements for related party transactions.
Comprehensive disclosures of related party transactions are required for each category of related party relationship.	Unlike IFRS, comprehensive disclosures of related party transactions are (only) required for significant (material) related party transactions that have not taken place under normal market conditions; for other related party transactions the disclosures are recommended.
The disclosure of related party relationships between parent and its subsidiaries is required, even if there have been no transactions between them. No disclosure is required in the consolidated financial statements of intragroup transactions eliminated in preparing those statements.	Unlike IFRS, disclosure of related party relationships between parents and subsidiaries is only required if there have been (material) transactions between them that have not been executed under normal market conditions. Like IFRS, no disclosure is required in the consolidated financial statements of intragroup transactions eliminated in preparing those statements.
Key management personnel compensation is disclosed in total and is analysed by component.	Like IFRS, key management personnel compensation is disclosed in total and analysed by component. However, unlike IFRS, such disclosure is only required if the compensation is not set under normal market conditions.  Unlike IFRS, in addition to the disclosure on key management personnel, a separate disclosure is required on the remuneration of members of the statutory board of directors and the statutory supervisory board. The detailed disclosure requirements differ for open public limited liability companies ('open NVs') and other companies: (i) Open public limited liability companies must disclose total compensation for each individual board member (both directors and supervisors), split into four components (only for directors). (ii) Other companies must disclose the total amount of compensation (not per component and not per individual board member), unless it can be traced back to one single natural person.

In certain cases, government-related entities are allowed to provide less detailed disclosures of related party transactions.	Unlike IFRS, the compensation should be disclosed separately for directors and supervisory directors, whereby it is preferred to make a distinction between current and former (supervisory) directors.  Unlike IFRS, there is no partial disclosure exemption for government-related entities.
<b>References:</b> IAS 24	<b>References:</b> CC, RJ 330, RJ 260, RJ 271

## 5.6 Accompanying financial and other information

IFRS Accounting Standards	Dutch GAAP
IFRS Accounting Standards do not require supplementary financial and operational information to be presented.	Unlike IFRS Accounting Standards, under Dutch GAAP several legal rules require the disclosure of information in addition to the financial statements, such as a management report, containing as a minimum, amongst other things, information about:
An entity considers its particular legal or regulatory requirements in assessing what information is disclosed in addition to that required by IFRS Accounting Standards.	<ul style="list-style-type: none"> <li>• the objective of the company, whether or not set out in a 'mission statement';</li> <li>• a description of the (core) activities of the company, with information concerning the main products, services, geographical areas and any categories of customers and suppliers;</li> <li>• the legal structure, including the group structure and the applicability of the two-tier regime;</li> <li>• the internal organisational structure and staffing;</li> <li>• the significant elements of the policies carried out;</li> <li>• the financial position at balance sheet date;</li> <li>• the developments during the past year;</li> <li>• the main risks and uncertainties the company has faced during the past year;</li> <li>• measures management has taken in relation to the risks and uncertainties and the potential impact of these risks and uncertainties;</li> <li>• financial and non-financial performance indicators;</li> <li>• research and development activities;</li> <li>• business outlook;</li> <li>• the effects on the projections of unusual events, which do not need to be reflected in the annual accounts;</li> <li>• the objectives and the policy of the legal person concerning risk management (e.g. hedging);</li> <li>• price, credit, liquidity and cash flow risks incurred;</li> <li>• diversity policy with regard to composition of management board and supervisory board;</li> <li>• information about the applicable code of conducts.</li> </ul>
The IFRS practice statement <i>Management Commentary</i> provides a broad, non-binding framework for the presentation of management commentary.	



An entity considers its particular legal or securities exchange listing requirements in assessing what information is included in addition to that required under IFRS Accounting Standards.

Further, the law requires the inclusion of 'Overige gegevens' ('Other information') in the annual report. This paragraph should contain:

- the auditor's report, or a statement as to the reason for its absence;
- a list of names of the persons having special rights of control in relation to the legal person under the articles of association, particulars of the nature of such rights, unless such information is provided in the directors' report;
- a list of existing branch establishments and the countries where there are branch establishments and the names under which they trade if different from that of the legal person.

Entities may (voluntary) provide an overview of key figures, ratios and multiple year figures. If provided, these figures should be derived from the financial statements and should be consistent from year to year.

Companies shall include information on environmental issues in the management report that is meaningful and comparable for users. This concerns information on the consequences of environmental risks and obligations for the financial position of the company, about the company's attitude towards the environment and the company's environmental performance to the extent that they have consequences for the financial position of the company.

In response to the updated Corporate Governance Code, the DASB amended RJ 400 *Management Board report*, RJ 404 *Pay and benefits report and remuneration report* and RJ 405 *Report of the Supervisory Board* adding the following:

- further details on sustainable long-term value creation (best practice provision ('bpp') 1.1.4) and culture (bpp 2.5.4);
- additional disclosure in the corporate governance statement on diversity and inclusion policies (bpp 2.1.6); and
- providing interpretation of the term 'remuneration ratios' and how this is calculated (bpp 3.4.1 (iv)).

The law contains special rules for listed entities, containing requirements on the frequency of providing financial information and the content of such information. For example, in addition to the financial statements and directors' report, compliance statements should be disclosed. In addition, a supervisory report is required for entities within scope of the Dutch Corporate governance code.

The presentation of alternative earnings measures is not prohibited, either in the statement of profit or loss and OCI or in the notes to the financial statements.

EU Taxonomy may also apply to entities applying IFRS Accounting Standards if they are in scope of EU Taxonomy.

Like IFRS Accounting Standards, a non-GAAP measure is not prohibited but it must be clearly described and disclosed and, as far as possible, a numerical reconciliation must be provided, so that such a measure is understandable. However, unlike IFRS Accounting Standards, it is explicitly stated that a non-GAAP measure must not be presented with more prominence than a GAAP measure.

The EU Taxonomy Regulation applies to: Large EU companies, large issuers (issuers of securities listed on a regulated EU Market) and Small and Medium-sized Enterprises ('SME') listed PIEs and SME issuers. Financial companies within the scope of the EU Taxonomy Regulation disclose for the first two environmental objectives on climate change mitigation and adaptation:

- (for asset management companies) the information to be reported in accordance with Annexes III, IV and XI of the Delegated Regulation;
- (for credit institutions) the information to be reported in accordance with Annexes V, VI and XI of the Delegated Regulation;
- (for investment firms) the information to be reported in accordance with Annexes VII, VIII and XI of the Delegated Regulation;
- (for insurance and reinsurance companies) the information to be reported in accordance with Annexes IX, X and XI of the Delegated Regulation;
- for the activities added in 2023 related to the first two environmental objectives, and for all activities related to the other four environmental objectives:
- the proportion of total assets of exposures to non-Taxonomy and Taxonomy-eligible economic activities;
- the qualitative information referred to in Annex XI of the Delegated Regulation.

Non-financial companies falling within the scope of the EU Taxonomy Regulation provide the following disclosures for all six environmental objectives:

- the proportion of taxonomy-eligible and taxonomy non-eligible economic activities in total turnover, capital expenditure and operational expenditure;
- the accompanying information to be reported in accordance with Annexes I and II of the Delegated Regulation.

### Forthcoming requirements

#### EU Taxonomy

EU Taxonomy may also apply to entities applying IFRS Accounting Standards if they are in scope of EU Taxonomy.

In April 2024, the International Accounting Standards Board issued IFRS 18 Presentation and Disclosure in Financial Statements, which is effective for annual periods beginning on or after 1 January 2027.

IFRS 18 provides a definition for management-defined performance measures ('MPMs') and introduces specific disclosure requirements. MPMs capture some but not all non-GAAP measures. MPMs are subtotals of income and expenses that are used in public communications outside the financial statements and communicate management's view of an aspect of the financial performance of the entity as a whole. MPMs exclude non-financial performance measures, financial performance measures that are not subtotals of income and expenses, subtotals of income or expenses required to be presented or disclosed by the Accounting Standards and common income and expense subtotals listed in IFRS 18. An entity will need to assess accompanying information reported outside the financial statements to identify subtotals of income and expenses that may meet the definition of an MPM.

#### References:

IAS 1, IFRS Practice Statement Management Commentary, IFRS 18

### Forthcoming requirements

#### EU Taxonomy

From 1 January 2026 (de facto for financial years beginning on or after 1 January 2025), financial companies falling within the scope of the EU Taxonomy Regulation provide the following disclosures for all six environmental objectives:

- (for asset managers) the information to be reported in accordance with Annexes III, IV, and XI of the Delegated Regulation;
- (for credit institutions) the information to be reported in accordance with Annexes V, VI, and XI of the Delegated Regulation;
- (for investment firms) the information to be reported in accordance with Annexes VII, VIII, and XI of the Delegated Regulation;

(for insurance and reinsurance companies) the information to be reported in accordance with Annexes IX, X, and XI of the Delegated Regulation.

No similar forthcoming requirements issued by the DASB.

#### References:

CC, RJ 400, RJ 405, RJ 410, RJ 420, RJ 430, RJ 2017-15

## 5.7 Interim financial reporting

### IFRS Accounting Standards

Generally, listed entities are advised to prepare interim reports.

If a company prepares an interim report in accordance with IAS 34, IFRS Accounting Standards require that disclosure of compliance with IAS 34 or IFRS Accounting Standards must be included.

Interim financial statements contain either a complete or a condensed set of financial statements for a period shorter than a financial year.

Condensed interim financial statements contain, as a minimum, a condensed statement of financial position, a condensed statement of profit or loss and other comprehensive income (presented either as a condensed single statement, or a condensed statement of profit or loss and a separate condensed statement of other comprehensive income), a condensed statement of changes in equity, a condensed statement of cash flows and selected explanatory notes.

Items, other than income tax, generally are recognised and measured as if the interim period were a discrete stand-alone period.

Income tax expense for an interim period is based on an estimated average annual effective income tax rate.

Generally, the accounting policies applied in the interim financial statements are those that will be applied in the next annual financial statements.

### Dutch GAAP

Among other things, the Wet op het Financieel Toezicht ('Wft') requires that the half-year financial statements shall be prepared in compliance with the provisions of IAS 34 *Interim Financial Reporting*, if the listed company is required to prepare consolidated financial statements and, therefore, falls within the scope of the IAS regulation. Specific provisions for listed companies that are not required to prepare consolidated financial statements are set out in the Wft and the Decree Transparency of Issuing Institutions Wft ('transparency decree'). These provisions are of a fairly general nature. Therefore, when preparing the half year financial statements, RJ 394 can be used as a reference.

For non-listed companies, there is no legal obligation to prepare and publish interim financial information. However, if non-listed companies choose to prepare an interim report on a voluntary basis in accordance with the RJ, they shall apply RJ 394 *Interim reports*.

Like IFRS Accounting Standards, interim financial statements contain either a complete or a condensed set of financial statements for a period shorter than a financial year.

Like IFRS Accounting Standards, condensed interim financial statements contain, as a minimum, condensed balance sheets, condensed income statements, condensed cash flow statements, condensed statements of changes in equity and selected explanatory notes.

Like IFRS Accounting Standards, items, other than income tax, generally are recognised and measured as if the interim period were a discrete stand-alone period.

Like IFRS Accounting Standards, income tax expense for an interim period is based on an estimated average annual effective income tax rate.

Like IFRS Accounting Standards, normally the accounting policies applied in the interim financial statements are those that will be applied in the next annual financial statements.



## 5.9 Common control transactions

This chapter deals with business combinations among entities under common control. It does not deal with the wider issue of common control transactions in general – e.g. the transfer of a single item of property, plant and equipment between fellow subsidiaries.

<p>An entity discloses in its interim financial statements the following information about revenue from contracts with customers:</p> <ul style="list-style-type: none"> <li>• A disaggregation into categories that depicts how the nature, amount, timing and uncertainty of revenue and cash flows are affected by economic factors.</li> <li>• Sufficient information about the relationship between the disclosure of disaggregated revenue and revenue information that is disclosed for each reportable segment (if the entity applies the standard on operating segments). Other annual disclosures about revenue are typically not required for interim financial reporting.</li> </ul> <p>An entity is prohibited from reversing an impairment loss recognised in a previous interim period in respect of goodwill.</p> <p>Certain impairment losses may not be reversed if they have been recognised in interim financial statements that state compliance either with IFRS Accounting Standards or with IAS 34.</p> <p>It is not clear whether these requirements apply when no such interim financial statements are prepared, but when an entity has prepared selected information in respect of an earlier interim period in which that impairment was recognised. In our view, judgement is needed and it may be relevant to consider whether the users of the selected interim financial information would have concluded that the impairment has been recognised in accordance with IFRS Accounting Standards.</p> <p>In KPMG’s view, judgement is needed and it may be relevant to consider whether the users of the selected interim financial information would have concluded that the impairment was recognised in accordance with IFRS Accounting Standards.</p>	<p>Unlike IFRS Accounting Standards, there is no such specific requirement.</p> <p>Unlike IFRS Accounting Standards, there is no specific guidance on the reversal of an impairment loss recognised in a previous interim period in respect of goodwill. Like IFRS Accounting Standards, depreciation and/or impaired goodwill cannot be reversed.</p>
<p><b>References:</b> IAS 34, IFRIC 10</p>	<p><b>References:</b> RJ 394</p>

## 5.8 Disclosure of interests in other entities

IFRS Accounting Standards	Dutch GAAP
<p>A single standard deals with the disclosure of information about an entity’s interests in other entities.</p>	<p>The IFRS 12 disclosure requirements for interests in other entities are much more extensive compared to Dutch GAAP.</p>
<p><b>References:</b> IFRS 12</p>	<p><b>References:</b> RJ 214</p>

IFRS Accounting Standards	Dutch GAAP
<p>The accounting issues on common control transactions and Newco formations dealt with in this chapter are not explicitly covered in IFRS Accounting Standards.</p> <p>A business combination involving entities or businesses under common control is exempt from the scope of the business combination standard and is not covered explicitly in any of the standards.</p> <p>A business combination involving entities or businesses under common control is a business combination in which all of the combining entities or businesses are ultimately controlled by the same party or parties both before and after the combination and that control is not transitory. The concept of control is discussed in chapter 2.7.</p> <p>In our view, the acquirer in a common control transaction should choose an accounting policy in respect of its consolidated financial statements, to be applied consistently to all similar common control transactions, to use:</p> <ul style="list-style-type: none"> <li>• ‘book value (carryover basis) accounting’ on the basis that the investment has simply been moved from one part of the group to another; or</li> <li>• ‘acquisition accounting’ on the basis that the acquirer is a separate entity in its own right and should not be confused with the economic group as a whole.</li> </ul> <p>In our view, the acquirer has a choice in its consolidated financial statements, to be applied consistently, in respect of whose book values are used: the ultimate parent, any intermediate parent, transferer of the entity transferred.</p> <p>In our view, the acquirer is permitted, but not required, to re-present its comparatives and adjust its current year before the date of the transactions as if the combination had occurred before the start of the earliest period presented (‘pooling of interests’). However, this restatement should not, in our view, extend to periods during which the entities were not under common control. The chosen accounting policy regarding comparative figures should be applied consistently to all similar common control transactions.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP contains specific provisions for recognition of mergers and acquisitions under common control, offering a choice of accounting policies between recognition in accordance with the purchase accounting method, the pooling of interests method or the carryover accounting method.</p> <p>Similar to IFRS Accounting Standards, a transaction is ‘under common control’ if the same party/parties ultimately has/have decisive influence over both the acquiring party (acquirer) and the acquired party or over the merging parties, both before and after the merger or acquisition.</p> <p>Unlike IFRS Accounting Standards, Dutch GAAP (RJ 216.503), contains specific requirements for the acquirers’ accounting of a merger or acquisition under common control. The acquirer uses one of the following methods in its consolidated financial statements:</p> <ul style="list-style-type: none"> <li>• the purchase method. Unlike IFRS Accounting Standards, this method may only be applied if it reflects the substance of the transaction;</li> <li>• the pooling of interests method; or</li> <li>• the ‘carryover accounting’ method. If the carryover accounting method is used, the carrying amounts of the assets and liabilities are combined on the acquisition date. The comparative figures are not restated.</li> </ul> <p>Like IFRS Accounting Standards, Dutch GAAP does not specifically prescribe which book value an acquirer should use in its consolidated financial statements. Under Dutch GAAP, in our view, the interpretation of book value depends on specific facts and circumstances and include:</p> <ul style="list-style-type: none"> <li>• the book values of the assets and liabilities of the acquired or merged business that were applied at the point of recognition in the separate (statutory) financial statements of the entity that is acquired or merged;</li> <li>• the (allocated) book values of the assets and liabilities of the acquired or merged business that were applied at the point of recognition by the (direct or ultimate) parent in its consolidated financial statements.</li> </ul>

In our view, in applying acquisition accounting to a common control transaction, the acquisition accounting methodology in the business combinations standard should be applied in its entirety by analogy (chapter 2.8). However, to the extent that the acquisition accounting gives rise to an apparent gain on a bargain purchase, in our view such amount should be recognised in equity as a capital contribution from the shareholders of the acquirer.

Unlike IFRS Accounting Standards, Dutch GAAP prescribes that when applying the pooling of interest method in the consolidated financial statements of the acquirer the assets and liabilities of the acquired or merged entity and the income and expenses over the financial year in which the acquisition or merger is executed and over the previous financial years presented for comparison, are recognised as if the acquisition or merger had already occurred at the start of those financial years for the periods in which the acquiring company and the transferred company were under common control. However, when applying the carryover accounting method recognition in the acquirer's consolidated financial statements takes place prospectively from the acquisition date.

Like IFRS Accounting Standards, if the purchase accounting method is applied under Dutch GAAP, this means application of the entire specific standard RJ 216 *Mergers and Acquisitions* by analogy (chapter 2.8). However, if the agreed consideration based on purchase accounting does not equal the fair value of the acquired activities (assets, liabilities and goodwill), then that difference is recognised in equity.

The transferor losing control in a common control transaction that is not a demerger applies the general guidance on loss of control in its consolidated financial statements.

The transferor losing control in a common control transaction that is not a demerger applies the general guidance on loss of control in its consolidated financial statements.

Common control transactions can be affected through the acquisition of assets and liabilities constituting a business or by acquiring shares in that business. Entities applying IFRS Accounting Standards have different options for the accounting of investments in subsidiaries. There are different types of common control transactions including sideways, downstream and upstream transfers. In some cases a new parent is established. All of these may impact the accounting in the acquirer's separate financial statements.

Unlike IFRS Accounting Standards, participating interests over which control is exercised are generally measured based on net equity value. The same methods as for the consolidated financial statements also apply in the separate financial statements of the acquiring company. Like IFRS Accounting Standards, the accounting may depend on the specific type of common control transactions.

**References:**  
IFRS 3

**References:**  
RJ 140, RJ 214, RJ216, RJ 260

## 5.10 Insurance contracts

### IFRS Accounting Standards

IFRS 17 *Insurance Contracts* is the IFRS Accounting Standard which replaces IFRS 4 on accounting for insurance contracts and has an effective date of 1 January 2023.

The insurance contracts standard applies generally to all insurance contracts (including reinsurance contracts) that an entity issues and reinsurance contracts that it holds, regardless of the type of entity that issued the contract.

The aggregation of contracts into groups is required on initial recognition for all contracts in the scope of the insurance contracts standard. Individual contracts are grouped in a way that limits the offsetting of profitable contracts against onerous ones, and also considering how an entity manages and evaluates the performance of its business.

An entity recognises a group of insurance contracts that it issues from the earliest of:

- the start of the coverage period of the group of contracts;
- the due date of the initial payment from a policyholder; and
- the date when a group of contracts becomes onerous.

The insurance contracts standard introduces the general measurement model (GMM). This is the default measurement model for insurance contracts.

On initial recognition a profitable group of insurance contracts is measured as the sum of the fulfilment cash flows and the contractual service margin (CSM). At each reporting date, the fulfilment cash flows are remeasured and reflected in either profit or loss or OCI – or in some cases they adjust the CSM. The CSM is also updated to reflect the unwinding of discounting for the time value of money.

Insurance revenue is allocated to profit or loss each period to reflect the provision of insurance contract services in the period.

### Dutch GAAP

The DASB has carried out a review of IFRS 17 *Insurance Contracts*. It has been decided that the provisions of IFRS 17 do not give rise to amendments of Dutch GAAP Accounting Standard RJ 605 *Insurers*. In addition, the DASB decided not to allow the application of IFRS 17, as an accounting policy option, under Dutch GAAP.

Unlike IFRS Accounting Standards, there is a special accounting regime for insurance and reinsurance entities, instead of a standard that applies to insurance contracts. Consequently, these entities are subject to specific recognition, measurement, presentation and disclosure requirements.

Contracts between an insurance entity and a reinsurance entity, which do not transfer insurance risk, should be accounted for as financial instruments (RJ 290).

Life and non-life insurance contracts should be separated in legal entities for life only or non-life only.

Unlike IFRS Accounting Standards, Dutch GAAP does not use the term 'onerous contracts' in the context of insurance contracts. Under Dutch GAAP an entity is required to perform premium deficiency testing at each reporting date. For any shortfall, a provision for unexpired risks is required.

Unlike IFRS Accounting Standards, Dutch GAAP does not include specific requirements on the initial recognition of the insurance contract in the statement of financial position. Generally, an insurance contract is recognised when it is written.

Unlike IFRS Accounting Standards, under Dutch GAAP there is no default measurement model for insurance contracts. The specific measurement model that applies depends on the type of business.

The life insurance provision must be measured using sufficient prudence, an actuarial method and is preferably forward-looking. A retrospective method may be used for the life insurance provision as well as a forward-looking actuarial method, if technical provisions based on that method are not lower than the provisions using a forward-looking method, or if the use of a forward-looking method is not possible because of the nature of the type of agreement concerned.

A prudent calculation means that measurement is not based on the most probable hypotheses but that a reasonable margin is taken into account for adverse movements concerning the different factors involved.

For contracts that meet certain criteria, an entity is permitted to use a simplified measurement approach – the premium allocation approach (PAA). For issued contracts with direct participation features, an entity is required to use a modified measurement model – the variable fee approach (VFA).

Under the GMM, on initial recognition and subsequently a group of insurance contracts is measured as:

- the sum of the estimates of expected cash flows, adjusted to reflect the time value of money and financial risk, plus a risk adjustment for non-financial risks; and
- the contractual service margin (CSM) for profitable groups of contracts, representing the unearned profit.

The requirements of the insurance contracts standard apply equally to reinsurance contracts issued. The GMM and PAA requirements are modified for reinsurance contracts held by an entity.

An insurance contract is derecognised when it is extinguished or when the terms of the contract are modified in a way that would have significantly changed the accounting for the contract had the new terms always existed.

Insurance contracts acquired in a business combination or portfolio transfer are classified and measured as if they were newly written. Contracts acquired in a business combination are measured at the date of acquisition under the insurance contracts standard.

The insurance contracts standard requires separate presentation of amounts relating to insurance contracts issued and reinsurance contracts held in the primary statements.

Similar to IFRS Accounting Standards, non-life insurance entities generally use a measurement approach that is comparable to the PAA.

Equalisation provisions should be recognised by credit insurance entities. Catastrophe provisions are allowed for existing contracts.

Unlike IFRS Accounting Standards, if a contract is legally an insurance contract, but the contract is linked to financial instruments, then there is a specific accounting treatment for such linked investments (that should be separately accounted for as ‘for risk of policyholder’) according to the presentation models N, O and P of the Annual Accounts Formats Decree.

Unlike IFRS Accounting Standards, a deposit element is not required to be unbundled from an insurance contract.

Unlike IFRS accounting Standards, the measurement is a two-step approach.

Initially, the book value of insurance liabilities should be recognised. Secondly, a liability adequacy test (LAT) should be performed, taking into consideration actual assumptions. It is allowed to use Solvency II calculations for this purpose. Any surplus on (related) investments (fair value above book value) can be included in the LAT.

For non-life liabilities a qualitative LAT is allowed.

Any deficit is recognised immediately in profit or loss.

The measurement of reinsurance contracts (disclosed as ‘reinsurer’s share’) should mirror the measurement of the original insurance liabilities which are reinsured, taking into account contractual terms and conditions.

Unlike IFRS Accounting Standards, Dutch GAAP does not contain specific requirements on the derecognition of insurance contracts.

Unlike IFRS Accounting Standards, under Dutch GAAP insurance contracts acquired in a business combination or portfolio transfer are measured at the fair value at acquisition date.

Unlike IFRS Accounting Standards, the presentation for insurance and reinsurance entities should meet the legal requirements of model N (balance sheet) and O or P (income statement) according to the Annual Accounts Format Decree.

The insurance contracts standard contains extensive disclosure requirements to enable users of the financial statements to assess the impacts that insurance contracts have on an entity’s financial position, financial performance and cash flows.

### Exclusions

The insurance contracts standard deals with all insurance contracts, except for:

- warranties issued directly by a manufacturer, dealer or retailer in connection with a sale of its good or services to a customer (chapters 3.10 and 4.1);
- employers’ assets and liabilities under employee benefit plans (chapter 4.3);
- retirement benefit obligations reported by defined benefit retirement plans;
- contractual rights or contractual obligations that are contingent on the future use of, or right to use, a non-financial item;
- residual value guarantees provided by a manufacturer, dealer or retailer, and a lessee’s residual value guarantee embedded in a lease (chapter 5.1);
- financial guarantee contracts, unless the issuer meets certain requirements and makes an irrevocable election to apply the insurance contracts standard to the financial guarantee contract (chapter 6.1);
- contingent consideration payable or receivable in a business combination (chapter 2.8);
- insurance contracts in which the entity is the policyholder, unless these contracts are reinsurance contracts held by the entity; and
- credit card and similar contracts that provide insurance coverage but whose pricing does not reflect an assessment of insurance risk for the individual customer, unless the insurance component is a contractual term that is separated.

### References

IFRS 17

Unlike IFRS Accounting Standards, in the balance sheet ‘the reinsurer’s share’ in the technical provisions is presented in such a way that it reduces the balance sheet total. Insurance liabilities are disaggregated on the face of the balance sheet in an amount for gross insurance liabilities and reinsurance receivables.

Like IFRS Accounting Standards, Dutch GAAP contains extensive disclosure requirements to enable users of the financial statements to assess the impacts that insurance contracts have on an entity’s financial position, financial performance and cash flows.

### Exclusion

Unlike IFRS Accounting Standards, Dutch GAAP Accounting Standard RJ 605 *Insurers* is applicable to insurance contracts issued by insurance and reinsurance entities only.

Like IFRS Accounting Standards, various Dutch GAAP Accounting Standards provide specific guidance on the accounting for insurance-type contracts outside the scope of RJ 605. However, the resulting scope exclusions under IFRS Accounting Standards and Dutch GAAP respectively differ.

### References:

RJ 605



## 5.11 Extractive activities

IFRS Accounting Standards	Dutch GAAP
IFRS Accounting Standards provide specialised extractive industry guidance only in respect of expenditures incurred on exploration for and evaluation of (E&E) mineral resources after obtaining a legal right to explore and before achieving technical and feasibility and commercial viability.	Unlike IFRS Accounting Standards, no specific guidance is provided for exploration and evaluation expenditure (E&E), and the general standards apply.
There is no industry-specific guidance on the recognition or measurement of pre-exploration expenditure or development expenditure. Pre-E&E expenditure is generally expensed as it is incurred.	Like IFRS Accounting Standards, there is no industry-specific guidance on the recognition or measurement of pre-exploration expenditure or development expenditure. Pre-E&E expenditure is generally expensed as it is incurred.
Entities identify and account for pre-exploration expenditure, E&E expenditure and development expenditure separately.	Like IFRS Accounting Standards, different kinds of expenditures may be identified and accounted for differently.
Each type of E&E costs can be expensed as incurred or capitalised, in accordance with the entity's selected accounting policy.	Unlike IFRS Accounting Standards, E&E costs can be capitalised only if they meet the criteria for development costs.
Capitalised E&E costs must be segregated and classified as either tangible or intangible assets, according to their nature.	Like IFRS Accounting Standards, capitalised E&E costs must be segregated and classified as either tangible or intangible assets, according to their nature.
The test for recoverability of E&E assets can combine several cash generating units, as long as the combination is not larger than an operating segment.	Unlike IFRS Accounting Standards, the general requirements for determining a cash generating unit (CGU) apply and CGUs cannot be combined.
Stripping costs incurred during the production phase of surface mining are included in the cost of inventory extracted during the period, if appropriate, or are capitalised as a non-current asset if they improve access to the ore body.	Unlike IFRS Accounting Standards, there is no specific guidance on stripping costs for surface mining. General standards need to be applied.
References: IFRS 6, IFRIC 20	References: RJ 210, RJ 212, RJ 121

## 5.12 Service concession arrangements

IFRS Accounting Standards	Dutch GAAP
The interpretation on service concession arrangements provides guidance on the accounting by private sector entities (operators) for public-to-private service concession arrangements. The guidance applies only to service concession arrangements in which the public sector (the grantor) controls or regulates: <ul style="list-style-type: none"> <li>• the services provided with the infrastructure;</li> <li>• to whom the operator should provide the services;</li> <li>• the price charged of end users; and</li> <li>• any significant residual interest in the infrastructure.</li> </ul>	Like IFRS Accounting Standards, the interpretation on service concession arrangements provides guidance on the accounting by private sector entities (operators) for public-to-private service concession arrangements. The guidance applies only to service concessions arrangements in which the public sector (the grantor) controls or regulates: <ul style="list-style-type: none"> <li>• the services provided with the infrastructure;</li> <li>• to whom the operator should provide the services;</li> <li>• the price charged of end users; and</li> <li>• any significant residual interest in the infrastructure.</li> </ul>
Legal ownership of the infrastructure during the term of the arrangement is not relevant in determining whether an arrangement is in the scope of the interpretation on service concession arrangements.	Like IFRS Accounting Standards, legal ownership of the infrastructure during the term of the arrangement is not relevant in determining whether an arrangement is in the scope of the interpretation on service concession arrangements.
For service concession arrangements in the scope of the guidance, the operator does not recognise public service infrastructure as its property, plant and equipment if the infrastructure is existing infrastructure of the grantor, or if the infrastructure is built or acquired by the operator as part of the service concession arrangement.	Like IFRS Accounting Standards, the infrastructure as part of the service concession arrangements is not recognised as property, plant and equipment.
If the grantor provides other items to the operator that the operator may retain or sell at its discretion and those items form part of the consideration for the services provided, then the operator accounts for the items as part of the transaction price as defined in the revenue standard (chapter 4.1).	Like IFRS Accounting Standards, If the grantor provides other items to the operator that the operator may retain or sell at its discretion and those items form part of the consideration for the services provided, then the operator accounts for the items as part of the transaction price as defined in the revenue standard (chapter 4.1).
The operator recognises and measures revenue for providing construction or upgrade services, and revenue for other services, in accordance with the revenue standard (chapter 4.1).	Like IFRS Accounting Standards, the operator recognises and measures revenue for providing construction or upgrade services, and revenue for other services, in accordance with the applicable revenue recognition standard.
The operator recognises a contract asset from the grantor for construction or upgrade services, including upgrades of existing infrastructure, as a financial asset and/or an intangible asset.	Like IFRS Accounting Standards, the operator recognises consideration receivable (contract asset) from the grantor for construction or upgrade services, including upgrades of existing infrastructure, as a financial asset and/or an intangible asset.
The operator recognises a financial asset to the extent that it has an unconditional right to receive cash (or another financial asset), irrespective of the use of the infrastructure.	Like IFRS Accounting Standards, the operator recognises a financial asset to the extent that it has an unconditional right to receive cash (or another financial asset), irrespective of the use of the infrastructure.
The operator recognises an intangible asset to the extent that it has a right to charge for use of the infrastructure.	Like IFRS Accounting Standards, the operator recognises an intangible asset to the extent that it has a right to charge for use of the infrastructure.

Any financial asset recognised is accounted for in accordance with the financial instruments standard (chapter 6), and any intangible asset in accordance with the intangible assets standard (chapter 3.2). There are no exemptions for these standards for operators.

The operator recognises and measures obligations to maintain or restore infrastructure, except for any construction or upgrade element, in accordance with the provisions standard.

The operator generally capitalises attributable borrowing costs incurred during the construction or upgrade periods to the extent that it has a right to receive an intangible asset. Otherwise, the operator expenses borrowing costs as they are incurred.

**References:**  
IFRIC 12, SIC-29, IFRS 15

Like IFRS Accounting Standards, any financial asset recognised is accounted for in accordance with the relevant financial instruments standards, and any intangible asset in accordance with the intangible assets standard. There are no exemptions for these standards for operators.

Like IFRS Accounting Standards, the operator recognises and measures obligations to maintain or restore infrastructure, except for any construction or upgrade element, in accordance with the provisions standard.

Like IFRS Accounting Standards, the operator generally capitalises attributable borrowing costs incurred during the construction or upgrade periods to the extent that it has a right to receive an intangible asset. Otherwise, the operator expenses borrowing costs as they are incurred.

**References:**  
RJ 221, RJ 390

### 5.13 Borrowing costs

IFRS Accounting Standards	Dutch GAAP
<p>Borrowing costs that are directly attributable to the acquisition, construction or production of a qualifying asset generally form part of the cost of that asset. Other borrowing costs are recognised as an expense.</p> <p>A 'qualifying asset' is one that necessarily takes a substantial period of time to be made ready for its intended use or sale. Financial assets, inventories that are manufactured or otherwise produced over a short period of time and contract assets that represent a conditional right to a financial asset, as well as investments (including in our view, investments in subsidiaries and equity-accounted investees), are not qualifying assets. Property, plant and equipment, internally developed intangible assets and investment property can be qualifying assets.</p> <p>Borrowing costs may include interest calculated using the effective interest method, certain finance charges and certain foreign exchange differences.</p>	<p>Unlike IFRS Accounting Standards, borrowing costs that are directly attributable to the acquisition, construction or production of a qualifying asset as part of the cost of that asset could be capitalised, but it is not required (i.e. an accounting policy choice). Borrowing costs that are not capitalised are expensed.</p> <p>The concept of a 'qualifying asset' is similar to IFRS.</p> <p>Like IFRS Accounting Standards, borrowing costs may include interest calculated using the effective interest method, certain finance charges and certain foreign exchange differences.</p>
<p><b>References:</b> IAS 23</p>	<p><b>References:</b> RJ 273</p>

## 6 Financial Instruments

### 6.0 IFRS 9 - Introduction

Requirements of IFRS 9 *Financial Instruments* and the related version of IFRS 7 *Financial Instruments: Disclosures*, which are effective should be applied by all entities. However, an option to apply IAS 39 rather than IFRS 9 is available to an insurer for annual periods beginning before 1 January 2023 as long as IFRS 17 *Insurance Contracts* has not been early adopted.

In addition, an entity on adopting IFRS 9 can choose to continue to apply the hedge accounting requirements in IAS 39 either:

- in their entirety instead of those in IFRS 9 until a new standard resulting from the IASB's ongoing project on accounting for dynamic risk management becomes effective; or
- for a fair value hedge of the interest rate exposure of a portfolio of financial assets or financial liabilities.

Note: an entity that chooses to continue to apply the hedge accounting requirements in IAS 39 is subject to the hedge accounting disclosure requirements in IFRS 7, as updated by IFRS 9.

### 6.1 Financial Instrument - Scope and definitions

IFRS Accounting Standards	Dutch GAAP
<p>A 'financial instrument' is any contract that gives rise to both a financial asset of one entity and a financial liability or equity instrument of another entity.</p> <p>Financial instruments include a broad range of financial assets and financial liabilities. They include both primary financial instruments (such as cash, receivables, debt, shares in another entity) and derivative financial instruments (e.g. options, forwards, futures, interest rate swaps, currency swaps).</p> <p>The standards of financial instruments apply to all financial instruments, except for those specifically excluded from their scope.</p> <p>Financial instruments subject to scope exclusions include certain loan commitments and financial guarantee contracts, as well as financial instruments in the scope of other specific standards – e.g. investments in subsidiaries and associates, leases, insurance contracts and employee benefits. However, certain investments in subsidiaries, associates and joint ventures are in the scope of the financial instruments standards.</p>	<p>Like IFRS Accounting Standards, Dutch GAAP defines a financial instrument as any contract that gives rise to both a financial asset of one entity and a financial liability of another entity.</p> <p>Like IFRS Accounting Standards, Dutch GAAP includes a similar range of financial assets and financial liabilities.</p> <p>Dutch GAAP, while similar to IFRS Accounting Standards, also explicitly scopes out the following:</p> <ul style="list-style-type: none"> <li>• Financial guarantees, except for financial guarantee contracts that may result in payments based on changes of an underlying like commodity price interest index or currency</li> <li>• Contracts with payments based on climatic, geological or other physical variables</li> <li>• Rights and obligations of an acquirer in a business combination to receive or pay contingent consideration</li> </ul>

- Certain items are specifically included in (partial) scope:
- Loan commitments for derecognition and impairment
  - Contract assets resulting from revenue contracts for impairment
  - Certain financial guarantees for impairment
  - Lease receivables for impairment

A financial guarantee contract is a contract that requires the issuer to make specified payments to reimburse the holder for a loss that it incurs because a specified debtor fails to make payment when it is due. Certain financial guarantee contracts are in the scope of IFRS 9, the financial instruments standard.

A loan commitment is a firm commitment to provide credit under pre-specified terms and conditions. Loan commitments are fully or partially in the scope of the financial instruments standard.

A contract to buy or sell a non-financial item may be required to be accounted for as a derivative, even though the contract itself is not a financial instrument. If contracts to buy or sell non-financial items can be settled net in cash or by another financial instrument, including if the non-financial item is readily convertible into cash, then they are included in the scope of the financial instruments standards.

**Forthcoming requirements**

In July 2024, the International Accounting Standards Board issued Annual Improvements to IFRS Accounting Standards: Derecognition of Lease Liabilities - Amendments to IFRS 9, which are effective for annual periods beginning on or after 1 January 2026.

The amendment clarify that gains and losses on extinguishment of lease liabilities in scope of IFRS 9 are recognised in profit or loss. The IASB decided to clarify this issue by amending paragraph 2.1(b)(ii) of IFRS 9 to add a cross-reference to paragraph 3.3.3 of IFRS 9.

- Like IFRS Accounting Standards, Dutch GAAP requires a bad debt provision for:
- lease receivables; and
  - debit balances under construction projects or agreements for the sale of goods or delivery of services.

Unlike IFRS Accounting Standards, Dutch GAAP specifically includes rights and obligations arising from insurance contracts, which primarily transfer financial risks instead of insurance risks and these contracts meet the definition of a financial asset, a financial liability or a derivative.

Unlike IFRS Accounting Standards, financial guarantee contracts where the issuer is obliged to make specific payments to reimburse the holder for a loss it incurs because a specific debtor does not fulfil its payment obligation, are not in scope of the financial instruments standard.

Unlike IFRS Accounting Standards, commitments to provide loans if and insofar as those commitments cannot be settled on a net basis or measured at fair value are not in scope. The disclosure requirements of RJ 290 do, however, apply to these commitments.

Like IFRS Accounting Standards, a contract to buy or sell a non-financial item may be required to be accounted for as a derivative, even though the contract itself is not a financial instrument.

**Forthcoming requirements**

The DASB has introduced new provisions in the Standards on the application of the effective interest rate method when measuring financial instruments at amortised cost. When the modification is not substantial, the RJ amended that if contractual cash flows change then one of the following two accounting methods should be applied:

- a) recognising the effect of the modified contractual cash flows directly in profit or loss – the new carrying amount is then calculated on the basis of the modified contractual cash flows and the original effective interest rate; or
- b) recognising the effect of the modified contractual cash flows in profit or loss over the remaining expected term of the financial instrument through adjusting the effective interest rate.

When choosing one of these accounting methods, the legal entity takes into account all facts and circumstances.

- The IASB has published amendments to the classification and measurement of financial instruments which will become effective for annual reporting periods beginning on or after 1 January 2026. Early adoption is permitted. The IASB changed the requirements related to:
- settling financial liabilities using an electronic payment system; and
  - assessing contractual cash flow characteristics of financial assets, including those with environmental, social and governance (ESG)-linked features.

The IASB issued an amendment on ‘contracts referencing Nature-dependent Electricity’ to assist companies better report the financial effects of such contracts. These contracts are often structured as Power Purchase Agreements’ (PPAs). The amendments include:

- clarifying the application of the ‘own-use’ requirements to physical PPAs;
- adding new disclosure requirements to enable investors to understand the effect of these contracts on a company’s financial performance and cash flows.

**References**  
IAS 32, IFRS 7, IFRS 9, IFRS 3

No forthcoming requirements under Dutch GAAP similar to the amendment published by the IASB.

**References:**  
DCC, RJ 290

**6.2 Derivatives and embedded derivatives**

IFRS Accounting Standards	Dutch GAAP
<p>A ‘derivative’ is a financial instrument or other contract within the scope of the financial instruments standards that has all of the following features:</p> <ul style="list-style-type: none"> <li>• Its value changes in response to some underlying variable (e.g. an interest rate), provided that in the case of a non-financial variable it is not specific to a party to the contract.</li> <li>• It has an initial net investment smaller than would be required for other instruments that have a similar response to changes in market factors.</li> <li>• It will be settled at a future date.</li> </ul> <p>An ‘embedded derivative’ is a component of a hybrid contract that affects the cash flows of the hybrid contract in a manner similar to a stand-alone derivative instrument.</p> <p>A hybrid instrument also includes a non-derivative host contract that may be a financial or a non-financial contract. The requirements on separation of embedded derivatives do not apply when the host contract is a financial asset in the scope of IFRS 9, the financial instruments standard. Instead, the hybrid financial instrument is assessed as a whole for classification under IFRS 9.</p>	<p>The definition of a ‘derivative’ is similar to IFRS Accounting Standards.</p> <p>The definition of an ‘embedded derivative’ is similar to IFRS Accounting Standards.</p> <p>Like IFRS Accounting Standards, an embedded derivative is accounted for separately from the host contract if it is not closely related to the host contract, if a separate instrument with the same terms as the embedded derivative would meet the definition of a derivative, and if the entire contract is not measured at FVTPL.</p>



An embedded derivative is accounted for separately from the host contract if it is not closely related to the host contract, if a separate instrument with the same terms as the embedded derivative would meet the definition of a derivative, and if the entire contract is not measured at FVTPL. In other cases, an embedded derivative is not accounted for separately as a derivative.

Unlike IFRS Accounting Standards, an embedded derivative is always accounted for from the host contract as a separate derivative if the separation criteria are met. This also thus applies for host contracts that are financial assets.

**References:**  
IAS 32, IFRS 9, IFRIC 9

**References:**  
RJ 290

### 6.3 Equity and financial liabilities

IFRS Accounting Standards	Dutch GAAP
<p>An instrument, or its components, is classified on initial recognition as a financial liability, a financial asset or an equity instrument in accordance with the substance of the contractual arrangement and the definitions of a financial liability, a financial asset and an equity instrument.</p>	<p>Like IFRS Accounting Standards, financial instruments are classified in the consolidated financial statements as equity or liabilities in accordance with their economic substance.</p> <p>Unlike IFRS Accounting Standards, for the separate financial statements, an accounting policy choice exists to classify a financial instrument based on its legal form or on its economic substance. Some financial instruments can be classified as equity based on their legal form, even if classification based on their economic characteristics would result in a financial liability classification. Examples include some (cumulative) preference shares and perpetual bonds. For the consolidated financial statements, the RJ sets out that economic substance is the decisive factor in the classification of equity / liabilities.</p> <p>Financial instruments classified as equity based on their legal form, that would be classified as debt based on its substance, should be presented as a separate equity line item in the balance sheet – either by type of financial instrument or for their total amount. The amount per instrument is included in the notes and the main terms and conditions.</p>
<p>A financial instrument is a financial liability if it contains a contractual obligation to transfer cash or another financial asset.</p>	<p>The text, hereafter, describes the accounting requirements in the consolidated financial statements.</p> <p>Like IFRS Accounting Standards, in the consolidated financial statements, an instrument is a liability if the issuer is obliged to settle it in cash or other financial instrument.</p>

A financial instrument is also classified as a financial liability if it is a derivative that will or may be settled in a variable number of the entity's own equity instruments or a non-derivative that comprises an obligation to deliver a variable number of the entity's own equity instruments.

Equity is the residual interest in the assets of the entity after deducting all of its liabilities.

An obligation for an entity to acquire its own equity instruments gives rise to a financial liability unless certain conditions are met.

Instruments to buy/sell shares in a subsidiary (in the consolidated financial statements) are instruments on own equity and specific rules apply.

As an exception to the general principle, certain puttable instruments and instruments, or components of instruments, that impose on the entity an obligation to deliver to another party a pro rata share of the net assets of the entity only on liquidation are classified as equity instruments if certain conditions are met.

The contractual terms of preference shares and similar instruments are evaluated to determine whether they have the characteristics of a financial liability.

The components of compound financial instruments, which have both liability and equity characteristics, are accounted for separately.

A non-derivative contract that will be settled by an entity delivering its own equity instruments is an equity instrument if, and only if, it is settleable by delivering a fixed number of its own equity instruments.

Unlike IFRS Accounting Standards, DASB amended RJ 290 and allows instruments with only profit-dependent payments to be classified as equity or liability. Profit-dependent payments are non-discretionary payments (or a portion thereof) that are contingent on the generation of sufficient available profit in any year after the issuance of the instrument. If there is an obligation to make a payment which exceeds the actual profit, then this is non-profit dependent and shall be classified as financial liability.

Like IFRS Accounting Standards, an instrument is a liability if it is or may be settled in a variable number of the entity's own equity instruments (e.g. equal to a specified value).

Like IFRS Accounting Standards, equity is the residual interest in the assets of the entity after deducting all of its liabilities.

Like IFRS Accounting Standards, an obligation for an entity to acquire its own equity instruments gives rise to a financial liability unless certain conditions are met.

Unlike IFRS Accounting Standards, there is an option to either consider these type of instruments as instruments on own equity or derivatives.

Like IFRS Accounting Standards, as an exception to the general principle, certain puttable instruments and instruments, or components of instruments, that impose on the entity an obligation to deliver to another party a pro rata share of the net assets of the entity only on liquidation are classified as equity instruments if certain conditions are met.

Like IFRS Accounting Standards, preference shares and similar instruments must be evaluated to determine whether they have the characteristics of a liability. Such characteristics may lead to classification of these instruments as a liability.

Unlike IFRS Accounting Standards, preference shares that bear dividends contingent solely on the basis of the entity's profit may as an accounting policy choice be recognised as equity or financial liability.

Like IFRS Accounting Standards, compound instruments that have both liability and equity characteristics are required to be split into these components in the consolidated financial statements.

Like IFRS Accounting Standards, instruments may have to be classified as liabilities, even if they are issued in the form of shares.

<p>A derivative contract that will be settled by the entity delivering a fixed number of its own equity instruments for a fixed amount of cash is an equity instrument. If such a derivative contains settlement options, then it is an equity instrument only if all settlement alternatives lead to equity classification.</p>	<p>Like IFRS Accounting Standards, the stipulations on non-derivative contracts and derivative contracts are similar.</p>
<p>Incremental costs that are directly attributable to issuing or buying back own equity instruments are recognised directly in equity.</p>	<p>Like IFRS Accounting Standards, incremental costs that are attributable directly to issuing own equity instruments are recognised directly in equity, net of the related tax.</p> <p>Unlike IFRS Accounting Standards, no specific guidance is provided on incremental costs that are attributable directly to buying back own equity instruments.</p>
<p>Treasury shares are presented as a deduction from equity.</p>	<p>Like IFRS Accounting Standards, treasury shares must be reported as a deduction from equity.</p>
<p>Gains and losses on transactions in an entity's own equity instruments are reported directly in equity.</p>	<p>Like IFRS Accounting Standards, gains and losses on transactions in own equity instruments are reported directly in equity, not in profit or loss.</p>
<p>Dividends and other distributions to the holders of equity instruments, in their capacity as owners, are recognised directly in equity.</p>	<p>Like IFRS Accounting Standards, dividends and other distributions to the holders of instruments classified as equity, in their capacity as owners, are recognised directly in equity.</p>
<p>Non-redeemable NCI are classified within equity, but separately from equity attributable to shareholders of the parent.</p>	<p>Unlike IFRS Accounting Standards, minority interests (NCI) are classified within group equity but separate from parent shareholders' equity.</p>
<p>IFRS Accounting Standards generally contain little guidance on the recognition and measurement of equity. IFRS 2 specifies recognition and measurement requirements for share-based payments.</p>	<p>Unlike IFRS Accounting Standards, more guidance is provided on the recognition and measurement of equity and the classification of the required captions within equity. Like IFRS Accounting Standards, Dutch GAAP provides special recognition and measurement requirements for share-based payments.</p>
<p><b>References:</b> IAS 1, IAS 32, IFRS 9, IFRIC 17</p>	<p><b>References:</b> CC, RJ 240, RJ 290</p>

## 6.4 Classification of financial assets and financial liabilities

IFRS Accounting Standards	Dutch GAAP
<p>Financial assets are classified into one of three measurement categories: amortised cost, FVOCI and FVTPL.</p>	<p>Unlike IFRS Accounting Standards, Dutch GAAP provides more options to measure financial assets and liabilities and more options to recognise fair value changes. However, Dutch GAAP does not allow to account for loans granted and financial liabilities at fair value through profit and loss.</p>
<p>A financial asset is classified as measured at amortised cost if it is held within a held-to-collect business model and its contractual cash flows are solely payments of principal and interest on the principal amount outstanding (SPPI).</p>	<p>In accordance with RJ 290, financial assets and liabilities are classified into the following categories:</p>
<p>A financial asset is classified as measured at FVOCI if it is held within a held-to-collect-and-for-sale business model and the contractual cash flows meet the SPPI criterion.</p>	<ul style="list-style-type: none"> <li>• Held-for-trading financial assets and financial liabilities are measured at fair value through profit or loss.</li> <li>• Hedging derivatives financial assets and financial liabilities are measured at cost or fair value.</li> <li>• Non-hedging derivatives (financial assets and financial liabilities) on listed shares are measured at fair value through profit or loss.</li> <li>• Other non-hedging derivatives (financial assets and financial liabilities) are measured at cost or lower fair value, or fair value through profit or loss.</li> <li>• Acquired loans and bonds that are held to maturity (financial assets) are measured at amortised cost, applying the effective interest rate method.</li> <li>• Other acquired loans and bonds (financial assets) are measured at amortised cost or fair value. If the latter option is applied, the entity may choose to recognise the fair value changes in profit or loss or in equity (revaluation reserve).</li> <li>• Loans and receivables (financial assets) are measured at amortised cost applying the effective interest rate method.</li> <li>• Investments in listed equity instruments not held for trading (financial assets) are measured at fair value, with a choice of recognising the fair value changes in profit or loss or in equity (revaluation reserve)</li> <li>• Investments in non-listed equity instruments not held for trading (financial assets) are measured at cost or fair value. If the latter option is applied, the entity may choose to recognise the fair value changes in profit or loss or in equity (revaluation reserve).</li> <li>• Other financial liabilities (not included in the aforementioned financial liability categories) are measured at amortised cost applying the effective interest rate method.</li> </ul>
<p>On initial recognition, an entity may choose to irrevocably designate a financial asset that would otherwise qualify for amortised cost or FVOCI as measured at FVTPL if this designation eliminates or significantly reduces a measurement or recognition inconsistency.</p>	<p>Unlike IFRS Accounting Standards, there is no concept of SPPI for the classification of financial assets under Dutch GAAP.</p>
<p>Investments in equity instruments fail the SPPI criterion and are, therefore, generally measured at FVTPL. On initial recognition, an entity may elect to present in OCI changes in the fair value of an investment in an equity instrument if it is not held for trading. Financial liabilities are classified and, subsequently, measured at amortised cost except for financial liabilities held for trading that are measured at FVTPL and financial liabilities that are designated as at fair value on initial recognition. The amount of change in fair value that is attributable to changes in the credit risk of the liability is presented in OCI and the remaining amount of change in fair value is presented in profit and loss. Amounts presented in OCI are never reclassified in profit and loss.</p>	<p>Unlike IFRS Accounting Standards, on the basis of well-founded reasons, it is permitted to reclassify, for example in case of a financial crisis.</p>
<p>Reclassification of financial assets is required if, and only if, the objective of the entity's business model for managing those financial assets changes. Such changes are expected to be very infrequent and are determined by the entity's senior management as a result of external or internal changes. These changes should be significant to the entity's operations and demonstrable to external parties.</p>	

A reclassification is recognised prospectively.

Reclassification from FVTPL to FVOCI the fair value on reclassification date is the new carrying amount. Based on this carrying amount a new effective interest rate is calculated. Subsequent changes in fair value are recognised in OCI.

Reclassification from FVTPL to amortised cost: the fair value on reclassification date is the new carrying amount. Based on this carrying amount a new effective interest rate is calculated.

Reclassification from FVOCI to FVTPL: the fair value accumulated in OCI on reclassification date is reclassified to profit and loss.

Reclassification from FVOCI to amortised cost: reclassify the financial asset at fair value to the amortised cost category and remove the fair value accumulated in OCI to adjust the reclassified fair value. The effective interest rate determined at initial recognition and the carrying amount are not adjusted as a result of reclassification.

Reclassification from amortised cost to FVTPL: the fair value on reclassification date is the new carrying amount. The difference between amortised cost and fair value is recognised in profit and loss.

Reclassification from amortised cost to FVOCI: remeasure the financial asset at fair value with any difference recognised in OCI.

On initial recognition, financial liabilities are generally classified as subsequently measured at amortised cost unless they are measured at FVTPL. Financial liabilities are measured at FVTPL if they meet one of the following conditions:

- financial liabilities held for trading (including derivatives); or
- financial liabilities that on initial recognition are designated as at FVTPL if certain conditions are met.

Reclassification of financial liabilities is not permitted.

#### Forthcoming requirements

Amendments to the financial instruments standard are effective for annual periods beginning on or after 1 January 2026; early adoption is permitted.

The amendments introduce an additional test to assess whether the SPPI criterion is met for certain financial assets with the following features:

Unlike IFRS Accounting Standards, upon reclassification of financial instruments from one (sub)category to another (sub)category any income and expenses at the time are:

- in case of a reclassification of a cost (sub)category to a fair value (sub)category, only recognised in the profit and loss account at the time that the financial instrument will be derecognised in the balance sheet;
- in case of a reclassification in a fair value (sub)category to a cost (sub)category, recognised as part of the initial measurement in the new (sub)category (the fair value at the time of reclassification is equal to the deemed cost). For the value difference between the measurement on the basis of the 'original' historical cost and the measurement based on the 'deemed cost', a revaluation reserve shall be held based on Article 390 paragraph 1.

Unlike IFRS Accounting Standards, DAS classifies financial liabilities into different categories:

- financial liabilities forming part of a trading portfolio are subsequently measured at FVTPL;
- derivatives whose subsequent measurement depends on whether they are hedging instruments and the underlying;
- other financial liabilities are subsequently measured at amortised cost.

Unlike IFRS Accounting Standards, reclassification of financial liabilities is not explicitly prohibited.

#### Forthcoming requirements

There are no forthcoming requirements under Dutch GAAP.

- contractual terms that change the timing or amount of the contractual cash flows based on a contingent event;
- both the cash flows before and after the contingent event meet the SPPI criterion; and
- the nature of the contingent event is not related directly to basic lending risks or costs (e.g. a borrower meeting specified ESG targets).

The contractual cash flows of such a financial asset meet the SPPI criterion if, and only if, in all contractually possible scenarios, the contractual cash flows are not significantly different from the contractual cash flows of an identical financial asset without such a contingent feature. The likelihood of the contingent event occurring is not considered in this analysis.

The amendments also clarify:

- that a financial asset has non-recourse features if an entity's ultimate right to receive cash flows is contractually limited to the cash flows generated by specified assets; and
- some of the key characteristics of contractually linked instruments that distinguish them from other instruments.

**References:**  
IAS 32, IFRS 9

**References:**  
CC, RJ 290

## 6.5 Recognition and derecognition

IFRS Accounting Standards	Dutch GAAP
Financial assets and financial liabilities, including derivative instruments, are recognised in the statement of financial position when the entity becomes a party to the instrument. However, 'regular-way' purchases and sales of financial assets are recognised and derecognised using either trade date or settlement date accounting.	Like IFRS Accounting Standards, financial assets and financial liabilities, including derivative instruments, are recognised in the statement of financial position at trade date.
A financial asset is derecognised only when the contractual rights to the cash flows from the financial asset expire or when the financial asset is transferred, and the transfer meets certain conditions.	Like IFRS Accounting Standards, a financial asset is derecognised upon the transfer of risks and rewards to a third party. Like IFRS Accounting Standards, a financial asset is transferred if the risks and rewards of ownership of the transferred financial asset are passed onto a third party.
A financial asset is transferred if an entity transfers the contractual rights to receive the cash flows from the financial asset or enters into a qualifying 'pass-through' arrangement. If a financial asset is transferred, then an entity evaluates whether it has retained the risks and rewards of ownership of the transferred financial asset.	Unlike IFRS Accounting Standards, for derecognition of financial assets, there is no mixed approach of risk/rewards and control under Dutch GAAP. The comprehensive derecognition rules of IFRS are not implemented in Dutch GAAP.



An entity derecognises a transferred financial asset if it has:

- transferred substantially all the risks and rewards of ownership; or
- neither retained nor transferred substantially all of the risks and rewards of ownership and has not retained control of the financial asset.

An entity continues to recognise a financial asset to the extent of its continuing involvement if it has neither retained nor transferred substantially all of the risks and rewards of ownership and it has retained control of the financial asset.

IFRS Accounting Standards require that a financial asset is derecognised when the contractual rights to its cash flows expire. However, there is no comprehensive guidance on how this criterion should be applied to contractual modifications of financial assets. IFRS Accounting Standards state that in some circumstances the renegotiation or modification of the contractual cash flows of a financial asset can lead to its derecognition. This is the case when the modification is either based on quantitative or qualitative criteria deemed to be substantial. Substantial modifications result in the derecognition of the financial asset and the recognition of a new financial asset, while the difference is recorded in profit and loss.

A financial liability is derecognised when it is extinguished or when its terms are substantially modified and the obligation specified in the contract is discharged, cancelled or has expired.

Like IFRS Accounting Standards, an entity derecognises a transferred financial asset if it has transferred substantially all the risks and rewards of ownership.

Like IFRS Accounting Standards, an entity assesses if the modification is substantial. If substantial, the financial instrument is derecognised and the new financial instrument is recognised, and any differences in the amortised cost shall be recorded in the profit and loss account.

The DASB amended RJ 290 on the accounting for modifications to the contractual terms that do not result in a significant change in the economic substance. Like IFRS Accounting Standards, it is now allowed to recognise the effect of the modified contractual cash flows directly in the result through discounting the modified contractual cash flows with the original effective interest rate (OEIR). However, unlike IFRS Accounting Standards, the previous accounting that leads to recognising the effect of the modified contractual cash flows in profit or loss over the remaining expected term of the financial instrument by adjusting the effective interest rate and keeping the carrying amount unchanged remains allowed.

Like IFRS Accounting Standards, a financial liability is derecognised when it is extinguished or when its terms are substantially modified and the obligation specified in the contract is discharged, cancelled or has expired.

When a debt instrument is restructured or refinanced and the terms have been substantially modified, the transaction is accounted for as an extinguishment of the old debt instrument, with a gain or loss recognised in profit or loss. The new debt instrument is recognised at fair value. If the modification transaction is accounted for as an extinguishment, then all of the costs incurred by the entity as part of the modification, are recognised in profit or loss.

Terms are considered to have been substantially modified when the net present value of the cash flows under the new terms, including any fees paid net of any fees received and discounted using the original effective interest rate - i.e. of the original debt instrument - differs by, at least, 10 percent from the present value of the remaining cash flows under the original terms. If the difference in present values of the cash flows is less than 10 percent, then an entity should perform a qualitative assessment to determine whether the terms of the two instruments are substantially different.

If the exchange or modification is not accounted for as an extinguishment/ derecognition then the revised gross carrying amount of the financial asset (or amortised cost of the financial liability) is recalculated by discounting the revised estimated future cash flows at the instrument's original effective interest rate (or credit-adjusted effective interest rate for POCI assets).

#### Forthcoming requirements

Amendments to the financial instruments standard are effective for annual periods beginning on or after 1 January 2026; early adoption is permitted.

In addition to clarifying the recognition and derecognition requirements of financial assets and financial liabilities, the amendments introduce a new exception that allows an entity to derecognise a financial liability that is settled using an electronic payment system before the settlement date if, and only if, the entity has initiated a payment instruction and:

- the entity has no practical ability to withdraw, stop or cancel the payment instruction;
- the entity has no practical ability to access the cash to be used for settlement as a result of the payment instruction; and
- the settlement risk associated with the electronic payment system is insignificant.

An entity can apply this exception on an electronic payment system-by-system basis.

**References:**  
IAS 32, IFRS 9, IFRIC 19

Unlike IFRS Accounting Standards, the assessment of whether a modification is substantial is the same for financial assets and financial liabilities.

Like IFRS Accounting Standards, an entity assesses if the modification is substantial. If substantial, the financial instrument is derecognised and the new financial instrument is recognised, and any differences in the amortised cost shall be recorded in the profit and loss account.

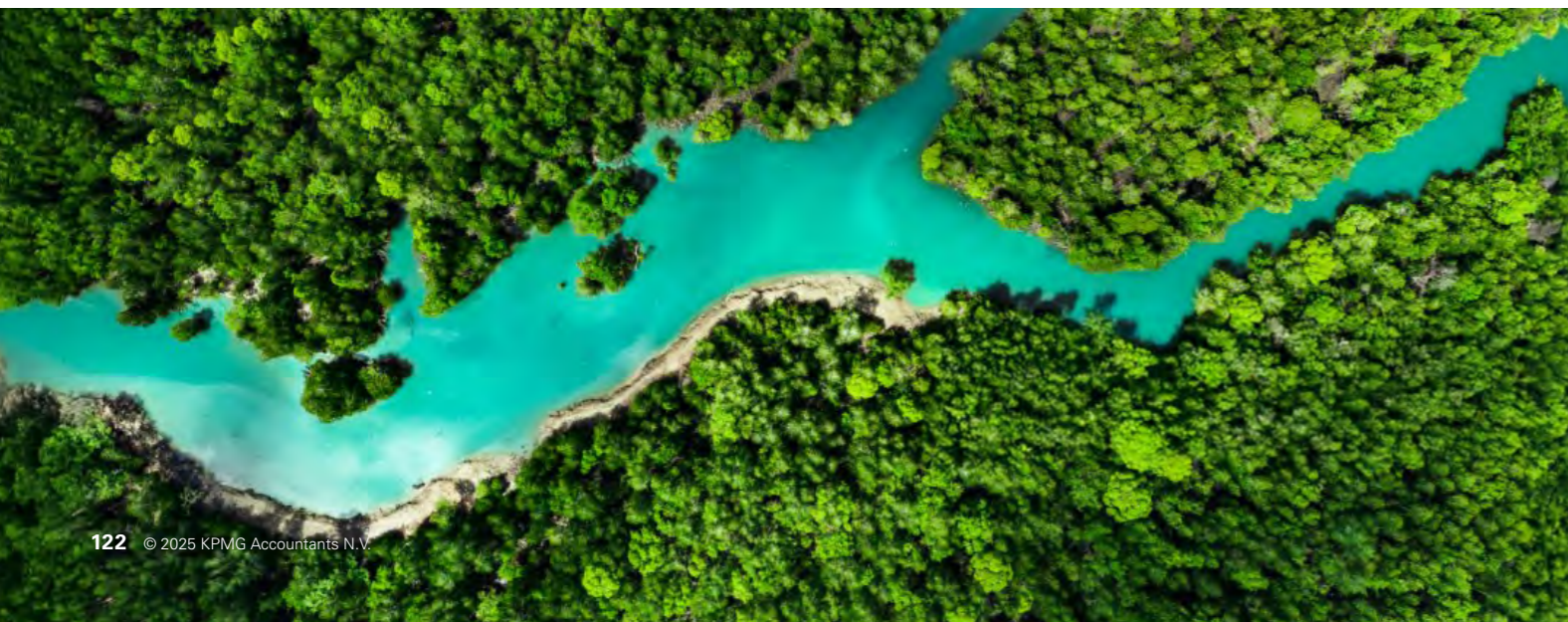
The DASB amended RJ 290 on the accounting for modifications to the contractual terms that do not result in a significant change in the economic substance. Like IFRS Accounting Standards, it is now allowed to recognise the effect of the modified contractual cash flows directly in the result through discounting the modified contractual cash flows with the original effective interest rate (OEIR). However, unlike IFRS Accounting Standards, the previous accounting that leads to recognising the effect of the modified contractual cash flows in profit or loss over the remaining expected term of the financial instrument by adjusting the effective interest rate and keeping the carrying amount unchanged remains allowed.

#### Forthcoming requirements

There are no forthcoming requirements under Dutch GAAP.

Unlike IFRS Accounting Standards, there is no specific exception for the derecognition of a financial liability that is settled using an electronic payment system. Therefore, differences in practice may arise.

**References:**  
RJ 115, RJ 290



## 6.6 Financial income and expense

IFRS Accounting Standards	Dutch GAAP
<p>Interest income and expense is calculated using the effective interest method.</p> <p>Incremental transaction costs directly related to raising finance or acquiring a financial asset are included in the initial measurement of the instrument unless the instrument is categorised as a financial asset or liability at FVTPL. Interest is generally expensed as incurred.</p> <p>Transactions costs on financial instruments subsequently measured at fair value through profit or loss are charged immediately to profit or loss.</p> <p>Interest related to qualifying assets shall be capitalised if certain conditions are met.</p> <p>Interest on both general borrowings and specific borrowings is eligible for capitalisation. The amount capitalised is net of investment income on the temporary investment of specific borrowings.</p>	<p>Like IFRS Accounting Standards, interest income and expense should be calculated using the effective interest method.</p> <p>Like IFRS Accounting Standards, incremental transaction costs directly related to raising finance or acquiring a financial asset are included in the initial measurement of the instrument.</p> <p>Like IFRS Accounting Standards, transactions costs related to financial instruments that are measured at fair value through profit or loss should be recognised directly in profit or loss.</p> <p>Unlike IFRS Accounting Standards, interest related to qualifying assets may be capitalised if certain conditions are met, but such capitalisation is not required.</p> <p>Like IFRS Accounting Standards, interest on both general borrowings and on specific borrowings is eligible for capitalisation. The amount capitalised is net of investment income on the temporary investment of specific borrowings.</p>
<p><b>References:</b> IAS 18, IAS 23, IAS 32, IFRS 9</p>	<p><b>References:</b> RJ 270, RJ 273, RJ 290</p>

## 6.7 Measurement and gains and losses

IFRS Accounting Standards	Dutch GAAP
<ul style="list-style-type: none"> <li>On initial recognition, financial assets and financial liabilities are measured at fair value plus directly attributable transaction costs, except for financial instruments classified as at FVTPL, which are initially measured at fair value; and</li> <li>trade receivables that are initially measured at the transaction price as defined in the revenue standard.</li> </ul> <p>After initial recognition a financial asset is subsequently measured at amortised cost, FVOCI or FVTPL.</p> <p>Amortised cost category: recognition in profit or loss of interest revenue using the effective interest method, expected credit losses and reversals and foreign exchange gains and losses. When the financial asset is derecognised the gain or loss is recognised in profit or loss.</p>	<p><i>General: legal entities under Dutch GAAP can opt to apply IFRS 9 (Financial Instruments) for the impairment losses based on the expected credit loss (ECL) model. Differences related to impairments may arise in case the option to adopt the ECL model is not applied for Dutch GAAP purposes. These differences are described later in this paragraph.</i></p> <p>Upon initial recognition, like IFRS Accounting Standards, financial instruments are measured at fair value and in the case of a financial instrument other than at fair value through profit or loss and transaction costs. The fair value, on initial recognition, is normally the transaction price, unless part of the consideration is for something other than a financial instrument or the instrument that bears an off-market interest rate.</p>

FVOCI category (debt instruments): recognition of gains and losses in OCI except for interest revenue using the effective interest method, expected credit losses and reversals and foreign exchange gains and losses that are recognised in profit or loss.

When the financial asset is derecognised the cumulative gain or loss is reclassified from OCI to profit or loss.

Equity instruments: recognition of gains and losses in OCI. Dividends are recognised in profit or loss unless they clearly represent a repayment of part of the cost of the investment. The amounts recognised in OCI are never reclassified to profit or loss.

FVTPL category: gains and losses, realised and unrealised, both on subsequent measurement and derecognition are recognised in profit or loss.

Financial liabilities, other than those measured at FVTPL, are generally measured at amortised cost subsequent to initial recognition. If a financial liability is mandatorily measured at FVTPL, then all changes in fair value are recognised in profit or loss.

Gains and losses of financial liabilities measured at FVTPL should be split. Fair value changes that are attributable to changes in credit risk of the liability should be presented in OCI. The amount presented in OCI is never reclassified to profit or loss.

All derivatives (including separated embedded derivatives) are measured at fair value, with changes in fair value generally recognised in profit or loss.

### Financial assets:

- Held-for-trading financial assets are measured at fair value through profit or loss.
- Hedging derivatives are measured at cost or fair value.
- Non-hedging derivatives on listed shares are measured at fair value through profit or loss.
- Other non-hedging derivatives are measured at cost or lower fair value, or fair value through profit or loss.
- Acquired loans and bonds that are held to maturity are measured at amortised cost, applying the effective interest rate method.
- Other acquired loans and bonds are measured at amortised cost or fair value. If the latter option is applied, the entity may choose to recognise the fair value changes in profit or loss or in equity (revaluation reserve).
- Loans and receivables are measured at amortised cost applying the effective interest rate method.
- Investments in listed equity instruments not held for trading are measured at fair value, with a choice of recognising the fair value changes in profit or loss or in equity (revaluation reserve).
- Investments in non-listed equity instruments not held for trading are measured at cost or fair value. If the latter option is applied, the entity may choose to recognise the fair value changes in profit or loss or in equity (revaluation reserve).

### Financial liabilities:

- Held-for-trading financial liabilities are measured at fair value through profit or loss.
- Hedging derivatives are measured at cost or fair value through profit or loss.
- Non-hedging derivatives on listed shares are measured at fair value through profit or loss.
- Other non-hedging derivatives are measured at cost or lower fair value, or fair value.
- Other financial liabilities (not taken into account in the aforementioned financial liability categories) are measured at amortised cost applying the effective interest rate method.

Under Dutch GAAP, decreases below amortised cost should be recognised in profit or loss (not allowed to recognise a negative revaluation reserve).

As is clear from the list above, unlike IFRS Accounting Standards, Dutch GAAP provides more financial instruments to be subsequently measured at cost (amortised cost, or lower fair value).

For example, unlike IFRS Accounting Standards, derivatives (including separated embedded derivatives) may be valued at cost or lower fair value.



Interest income and interest expense are calculated under the effective interest method, based on estimated cash flows that consider all contractual terms of the financial instrument at the date on which the instrument is initially recognised or at the date of any modification.

If the modification of the contractual cash flows of a financial asset does not result in its derecognition, then the gross carrying amount of the financial asset is recalculated at the present value of the modified contractual cash flows discounted at the original effective interest rate and a modification gain or loss is recognised in profit or loss. Any costs or fees incurred adjust the carrying amount of the modified asset and are amortised over the remaining term of the asset.

If an exchange or modification of a financial liability does not result in its derecognition, then the amortised cost of the financial liability is recalculated at the present value of the modified contractual cash flows discounted at the original effective interest rate and the adjustment is recognised in profit or loss. Any costs or fees incurred adjust the carrying amount of the modified liability and are amortised over the remaining term of the liability.

Like IFRS Accounting Standards, changes in the fair value of financial assets and financial liabilities at fair value through profit or loss are recognised in profit or loss.

Like IFRS Accounting Standards, interest income and interest expense are calculated under the effective interest method, based on estimated cash flows that consider all contractual terms of the financial instrument at the date on which the instrument is initially recognised or at the date of any modification. Unlike IFRS Accounting Standards, amortisation on a straight-line basis is allowed if this does not lead to material differences with the EIR method.

The DASB has included provisions for this in RJ 290 *Financial instruments* (290.523a and 290.523b), for financial years starting on or after 1 January 2024. If the contractual cash flows change as a result of such a modification, then the DASB allows the following two accounting methods:

- a. like IFRS Accounting Standards, recognising the effect of the modified contractual cash flows directly in profit or loss; or
- b. unlike IFRS Accounting Standards, amortising the effect of the modified contractual cash flows to profit or loss over the remaining expected term of the financial instrument through adjusting the effective interest rate.

Under a.: the change is determined by recalculating the amortised cost of the financial instrument as the present value of the modified contractual cash flows discounted at the original's effective interest rate less any write-downs for impairments or collectability.

Under b.: a new effective interest rate is calculated on the basis of the modified contractual cash flows. The new effective interest rate is the rate that discounts the newly agreed contractual cash flows over the remaining expected life of the financial instrument to the amortised cost of the financial instrument immediately prior to the modification.

In the view of the DASB, both accounting methods give substance to generally accepted accounting principles for providing a true and fair view. When choosing one of these accounting methods, the legal entity takes into account all facts and circumstances.

Like IFRS Accounting Standards, any costs or fees incurred adjust the carrying amount of the modified asset or liability and are amortised over the remaining term of the liability.

The impairment model in the financial instruments standard (expected credit loss / ECL model) covers financial assets measured at amortised cost, investments in debt instruments measured at fair value through OCI, certain loan commitments and financial guarantee contracts issued, lease receivables and contract assets. Investments in equity instruments are outside the scope of the ECL requirements.

Impairment is recognised using an expected loss model, which means that it is not necessary for a loss event to occur before an impairment loss is recognised.

The general approach of the ECL model uses two measurement bases: 12-month ECLs and lifetime ECLs, depending on whether the credit risk on a financial asset has increased significantly since initial recognition.

ECLs on trade receivables and contract assets that do not have a significant financing component are always measured at lifetime ECLs. There is an accounting policy election to measure ECLs on trade receivables that have a significant financing component and on lease receivables either using the general approach or at lifetime ECLs.

For financial assets that are credit impaired on initial recognition, ECLs are measured as the change in lifetime ECLs since initial recognition. Accordingly, the amount recognised as a loss allowance for these assets is not the total amount of lifetime ECLs but instead the changes in lifetime ECLs since initial recognition of the asset.

ECLs are measured in a way that reflects:

- a probability-weighted amount determined by evaluating a range of possible outcomes;
- the time value of money; and
- reasonable and supportable information about past events, current conditions and forecasts of future economic conditions.

Specific line items in profit or loss are required with respect to interest revenue calculated using the effective interest rate; gains and losses arising from the derecognition of financial assets measured at amortised cost; impairment losses; gains and losses arising on reclassification of financial assets out of the amortised cost category into the FVTPL category and cumulative gains and losses reclassified from OCI to profit or loss of financial assets reclassified out of the FVOCI category into FVTPL category.

Unlike IFRS Accounting Standards, an entity assesses impairment on the basis of the 'incurred loss model'. Under this model an entity assesses whether there is objective evidence of impairment of financial assets not measured at fair value through profit or loss. When there is objective evidence of impairment, any impairment loss is recognised in profit or loss.

In addition to the incurred loss model, RJ 290 permits the application of the expected credit loss model from IFRS.

Furthermore, unlike IFRS Accounting Standards, under Dutch GAAP some financial assets can be measured at cost or lower fair value. If this option is chosen, the aforementioned impairment rules do not apply.

When applying combination 3, the accounting policies applied in the IFRS consolidated financial statements are applied in the parent company financial statements as well. Thus, expected credit losses would have to be calculated on intercompany loans granted by the parent company. As these loans are eliminated on consolidation, no such ECL exists in the consolidated financial statements, potentially giving rise to a difference between consolidated and parent company equity and profit or loss. This has been solved by the DASB by issuing RJ 100.107a. RJ 100.107a requires the elimination of the ECL in the parent company accounts against the net equity value of the relevant subsidiary / associate/ joint venture; or against the carrying amount of the intercompany loans.



### Forthcoming requirements

In July 2024, the International Accounting Standards Board issued Annual Improvements to IFRS Accounting Standards: Transaction Price - Amendments to IFRS 9, which are effective for annual periods beginning on or after 1 January 2026. The amendments to IFRS 9 Accounting Standards clarify that, on initial recognition, trade receivables that do not contain a significant financing component are measured at the amount determined applying IFRS 15. This means that the trade receivable amount on initial recognition may differ from the transaction price determined under IFRS 15.

### References:

IAS 21, IAS 32, IFRS 9, IFRS 13

### Forthcoming requirements

No forthcoming requirements under Dutch accounting standards.

### References:

CC, RJ 290, RJ 273

## 6.8 Hedge accounting

IFRS Accounting Standards	Dutch GAAP
<p>Hedge accounting is voluntary and if selected, allows an entity to selectively measure assets, liabilities and firm commitments on a basis different from that otherwise stipulated in IFRS Accounting Standards, or to defer the recognition in profit or loss of gains or losses on derivatives.</p> <p>Hedge accounting is required to be closely aligned with its actual risk management objectives. Hedge accounting is permitted only when specific requirements related to documentation and effectiveness are met. An entity can designate an item in its entirety or a component of an item as the hedged item. However, only certain components may be designated as the hedged item.</p> <p>There are three hedge accounting models: fair value hedges of fair value exposures; cash flow hedges of cash flow exposures; and net investment hedges of currency exposures on net investments in foreign operations.</p> <p>Hedge accounting is permitted only when specific requirements related to documentation and effectiveness are met.</p> <p>Hedge accounting is required to be closely aligned with an entity's actual risk management objectives.</p>	<p>Like IFRS Accounting Standards, hedge accounting allows an entity to selectively measure assets, liabilities and firm commitments on a basis different from that otherwise stipulated in Dutch GAAP, or to defer the recognition in profit or loss of gains or losses on derivatives.</p> <p>Hedge accounting is voluntary. However, it is permitted only when strict documentation and effectiveness requirements are met.</p> <p>Like IFRS Accounting Standards, the three IFRS hedge accounting models are implemented under Dutch GAAP. However, unlike IFRS Accounting Standards, Dutch GAAP permits a fourth model: cost price hedge accounting. Cost price hedge accounting is accounted for (to the extent the hedge relationship is effective) as follows:</p> <ul style="list-style-type: none"><li>• If the hedged item is recognised at cost, the derivative is also recognised at cost.</li><li>• As long as the hedged item is not yet recognised in the balance sheet, the hedging instrument is not remeasured in the balance sheet either.</li></ul>

Qualifying hedged items can be recognised assets or liabilities, unrecognised firm commitments, highly probable forecast transactions or net investments in foreign operations, net exposures or an aggregated exposure (a combination of non-derivative exposure and a derivative exposure).

The hedged risk should be one that could affect profit or loss or OCI only if the hedged item is an investment in equity instruments for which changes in fair value are presented in OCI.

An entity can designate an item in its entirety or a component of an item as the hedged item. However, only certain components may be designated as the hedged item.

The following contracts with a party external to the reporting entity qualify as hedging instruments: derivative instruments (with some exceptions), non-derivative financial instruments measured at FVTPL (with some exceptions) and for hedges of foreign exchange risk only, the foreign currency risk component of a non-derivative financial instrument.

Effectiveness testing is performed on a prospective basis only.

An entity may exclude the time value of a purchased option, forward element of a forward contract and foreign currency basis spread from the designation of a hedging instrument.

For a hedge to meet the hedge effectiveness requirement, there has to be an economic relationship between the hedged item and hedging instrument. Also, the value changes should not be dominated by the effect of credit risk and specific requirements relating to the hedge ratio should be met.

Having an economic relationship means that the hedging instrument and the hedged item have values that generally move in the opposite direction because of the same (hedged) risk. The assessment relates to expectations about hedge effectiveness; therefore, the test is only forward-looking or prospective.

For assessing whether a hedging relationship meets the hedge effectiveness requirements prospectively, a qualitative methodology (e.g. critical terms test) or a quantitative test (e.g. regression analysis) is permitted.

Unlike IFRS Accounting Standards, it is a condition that the hedged position should effect profit or loss without the hedge accounting relationship.

Like IFRS Accounting Standards, an entity can designate an item in its entirety or a component of an item as the hedged item. However, only certain components may be designated as the hedged item.

Unlike IFRS Accounting Standards, the following contracts with a party external to the reporting entity qualify as hedging instruments: derivative instruments (except net written options), non-derivative financial assets or liabilities used as a hedge of foreign currency risk.

Unlike IFRS Accounting Standards, effectiveness testing is conducted on both prospective and retrospective bases.

Like IFRS Accounting Standards, an entity may exclude the time value of a purchased option, forward element of a forward contract and foreign currency basis spread from the designation of a hedging instrument. However, unlike IFRS Accounting Standards, the 'cost of hedging' concept does not exist under Dutch GAAP.

The effectiveness test described in the IFRS Accounting Standards column is one of the allowed methods under Dutch GAAP.

Dutch GAAP states that the level of (in)effectiveness may be determined by comparing the critical terms of the hedge instrument and the hedge item. If these critical terms are not equal, then the level of (in)effectiveness should be determined by comparing the fair value changes of the hedge instrument and those of the hedge item (see above).

If the cost price hedge accounting model is used, RJ 290 states that only a cumulative loss (loss as from the date of initial recognition of the financial instrument) is recognised in profit or loss.



Rebalancing of the hedge ratio in a hedging relationship is a mandatory requirement if certain conditions are met.

For a cash flow hedge and a net investment hedge, the ineffective portion of the gain or loss on the hedging instrument is recognised in profit or loss, even if the hedge has been highly effective.

A hedging relationship is discontinued in its entirety when as a whole it ceases to meet the qualifying criteria after considering any rebalancing of the hedging relationship (if applicable). Voluntary discontinuation when the qualifying criteria are met is prohibited.

Hedge documentation should be prepared for each individual hedge relation.

If certain conditions are met, net positions of hedged items are allowed.

IFRS 9 allows an entity to choose as its accounting policy to defer application of the new general hedge accounting model and continue to apply the hedge accounting requirements of IAS 39 in their entirety until the standard resulting from the IASB's project on macro hedge accounting is effective.

Some key differences between IFRS 9 and IAS 39 are:

Under IAS 39:

- Retrospective ineffectiveness testing
- Effectiveness requirement between 80%-125%

Under IFRS 9:

- Netting of positions allowed
- Rebalancing allowed
- Cost of hedging concept

#### Costs of hedging concept

From the hedging relationships an entity may exclude the time value of purchased options, the forward element of forward contracts and foreign currency basis spreads. These excluded elements will be recognised in OCI and, subsequently, be deferred in case of transaction-related hedged items and amortised in case of time period-related hedged items.

Aggregated exposures (a combination of a non-derivative exposure and a derivative) are allowed to be used as hedged item.

Unlike IFRS Accounting Standards, rebalancing does not exist under Dutch GAAP.

Like IFRS Accounting Standards, for a cash flow hedge and a net investment hedge, the ineffective portion of the gain or loss on the hedging instrument is recognised in profit or loss, even if the hedge has been highly effective.

Like IFRS Accounting Standards, hedge accounting is discontinued prospectively if the hedged transaction is no longer highly probable; the hedging instrument expires, is sold, terminated or exercised; the hedged item is sold, settled or otherwise disposed of; or the hedge is no longer highly effective.

Two options for hedge documentation can be used:

- Individual hedge documentation
- Generic hedge documentation for groups of hedging instruments

Net positions are not allowed under Dutch GAAP. Similar outcome can be achieved by allocating the net position to the largest gross position as hedged item.

Dutch GAAP has its own hedge accounting requirements and does not allow the application of IFRS 9 or IAS 39 hedge accounting requirements.

Unlike IFRS Accounting Standards, when applying IFRS 9, the concepts of netting of positions, rebalancing and cost of hedging do not exist under Dutch GAAP.

The costs of hedging concept does not exist under Dutch GAAP. Excluded elements (which may be time value of purchased options or the forward elements of a forward contract) of derivatives in a hedge relation will be measured at the basic measurement policies.

Dutch GAAP does not explicitly forbid aggregated exposures.



IFRS 9 forbids credit risk to be designated as a hedged risk. Certain credit exposures that are managed for credit risk with credit derivatives may be designated at fair value through profit or loss (FVTPL).

The IASB has a separate active project to address dynamic risk management. In the meantime, an entity may apply the hedge accounting requirements of the old accounting standard, IAS 39, for a portfolio fair value hedge of interest rate risk. This policy choice is also available if an entity applies the hedge accounting requirements in the financial instruments standard, IFRS 9.

#### Forthcoming requirements

The IASB issued an amendment on 'contracts referencing Nature-dependent Electricity' to assist companies better report the financial effects of such contracts. These contracts are often structured as 'Power Purchase Agreements' ('PPAs'). The amendments include:

- permitting hedge accounting if these contracts are used as hedging instruments; and
- adding new disclosure requirements to enable investors to understand the effect of these contracts on a company's financial performance and cash flows.

#### References:

IAS 1, IAS 32, IFRS 7, IFRS 9 and IFRS 13

Unlike IFRS Accounting Standards, credit risk can be designated as a hedged risk, provided that all hedge accounting requirements can be met.

Unlike the IASB, the Dutch Accounting Standards Board does not have a separate active process on dynamic risk management.

#### Forthcoming requirements

No forthcoming requirements under Dutch accounting standards.

#### References:

CC, RJ 290



## 6.9 Presentation and disclosures

IFRS Accounting Standards	Dutch GAAP
<p>IFRS Accounting Standards mandate separate presentation of certain amounts in the statement of financial position and in the statement of profit or loss and OCI.</p>	<p>Generally, there are fewer disclosure requirements under Dutch GAAP. However, entities reporting in accordance with Dutch GAAP which includes Civil Law are required to follow the 'Annual Accounts Formats Decree' or 'Besluit Modellen Jaarrekening (BMJ)'. The BMJ is more prescriptive on the specific line items that should be included in the balance sheet, and profit and loss accounts.</p>
<p>A financial asset and a financial liability are offset only when there is both a legally enforceable right to offset and an intention to settle net or to settle both amounts simultaneously.</p>	<p>Like IFRS Accounting Standards, a financial asset and a financial liability are offset only when there is both a legally enforceable right to offset and an intention to settle net or both amounts simultaneously.</p>
<p>Disclosure is required in respect of the significance of financial instruments for the entity's financial position and performance, the nature and extent of risk arising from financial instruments and how the entity manages those risks.</p>	<p>Like IFRS Accounting Standards, disclosure is required in respect of the significance of financial instruments for the entity's financial position and performance, the nature and extent of risk arising from financial instruments and how the entity manages those risks. However, Dutch GAAP provides less detailed disclosure rules as required under IFRS Accounting Standards.</p>
<p>Risk disclosures require both qualitative and quantitative information.</p>	
<p>The overriding principle is to disclose sufficient information to enable users of financial statements to evaluate the significance of financial instruments for an entity's financial position and performance.</p>	<p>Like IFRS Accounting Standards, the overriding principle is to disclose sufficient information to enable users of financial statements to evaluate the significance of financial instruments for an entity's financial position and performance.</p>
<p>Disclosure is also required about the nature and extent of risks arising from financial instruments and how the entity manages those risks. This includes both qualitative and quantitative information.</p>	<p>Like IFRS Accounting Standards, disclosure is also required about the nature and extent of risks arising from financial instruments and how the entity manages those risks. This includes both qualitative and quantitative information.</p>
<p>For disclosure of the significance of the financial instruments, the overriding principle is to disclose sufficient information to enable users of financial statements to evaluate the significance of the financial instruments for an entity's financial position and performance.</p>	<p>Like IFRS Accounting Standards, for disclosure of the significance of the financial instruments, the overriding principle is to disclose sufficient information to enable users of financial statements to evaluate the significance of the financial instruments for an entity's financial position and performance. However, Dutch GAAP provides less detailed disclosure rules as required under IFRS Accounting Standards.</p>
<p>Qualitative disclosures describe management's objectives, policies and processes for managing risks arising from financial instruments.</p>	<p>Like IFRS Accounting Standards, qualitative disclosures are required in respect of financial risks and management's approach to managing these risks.</p>
	<p>Unlike IFRS Accounting Standards, only significant contractual terms and conditions of, and accounting policies applied to, all financial instruments must be disclosed.</p>

Quantitative data about the exposure to risks arising from financial instruments is based on information provided internally to key management. However, certain disclosures about the entity's exposures to credit risk, liquidity risk and market risk arising from financial instruments are required, irrespective of whether this information is provided to management.

An entity is required to provide information about its reverse factoring arrangements that enables the users of financial statements to:

- assess how the arrangements affect the entity's liabilities and cash flows (see chapter 2.3); and
- understand the effect of the arrangements on the entity's exposure to liquidity risk and how the entity might be affected if the arrangements were no longer available to it.

### Forthcoming requirements

No forthcoming requirements on liquidity risk in financial instruments for IFRS.

### Statement of profit or loss and OCI

The amendments require additional disclosures for financial assets and financial liabilities that are not measured at FVTPL and have contractual features that could change the amount of contractual cash flows based on the occurrence (or non-occurrence) of a contingent event that is not related directly to a basic lending risk or cost.

Under the amendments, an entity needs to disclose, separately for each class of financial assets and financial liabilities:

- a qualitative description of the nature of the contingent event;
- quantitative information about the possible changes to contractual cash flows that could result from those contractual terms – e.g. the range of possible changes; and
- the gross carrying amount of financial assets and the amortised cost of financial liabilities subject to those contractual terms.

Like IFRS Accounting Standards, the fair value of instruments not carried at fair value in the financial statements must be disclosed. In addition, disclosure is required for methods used and significant assumptions made for determining fair value.

Unlike IFRS Accounting Standards, there are no such requirements under Dutch GAAP.

### Forthcoming requirements

#### Disclosure of liquidity risk in financial instruments

The amendments introduce a new requirement on liquidity risk. This requirement states that it may be important to provide information about contractual arrangements and their business purpose, if the risks arising from (the discontinuation of) such arrangements are significant in assessing the legal entity's liquidity position. Examples of such arrangements are factoring, reverse factoring, credit facilities and master netting agreements.

### Statement of profit or loss and OCI

Unlike IFRS Accounting Standards, there are no specific disclosures for financial assets and financial liabilities that are not measured at FVTPL and have contractual features that could change the amount of contractual cash flows based on the occurrence (or non-occurrence) of a contingent event that is not related directly to a basic lending risk or cost.



Investments in equity instruments designated as at FVOCI

The amendments modify existing disclosures and add new disclosures for investments in equity instruments at FVOCI. The new disclosures are:

- the fair value gain or loss presented in OCI during the reporting period, separately showing the amount related to investments derecognised during the reporting period and the amount related to investments held at the end of the reporting period; and
- for investments derecognised during the reporting period, any transfers of the cumulative gain or loss within equity during the reporting period.

IFRS 18 introduces a more structured statement of profit or loss. It requires entities to classify income and expenses into five categories, three of which are new - i.e. operating, investing and financing - and the income tax and discontinued operations categories. It also requires entities to present two new subtotals in the statement of profit or loss. In addition, IFRS 18 provides enhanced guidance on how entities group (aggregate and disaggregate) information in the primary financial statements and the notes.

**References:**  
IAS 1, IAS 32, IFRS 7, IFRS 9 and IFRS 13

Investments in equity instruments designated as at FVOCI

Unlike IFRS Accounting Standards, there are no such requirements under Dutch GAAP.

**References:**  
CC, RJ 290, RJ 400

# Appendices

## List of abbreviations used

Abridged name for specific terms, persons, organisations or items.

AFM	Autoriteit Financiële Markten - Financial Markets Authority
BAW	Besluit Actuele Waarde - Current Value Decree
BMJ	Besluit Modellen Jaarrekening - Annual Accounts Formats Decree
BV	Besloten vennootschap - Private limited liability company (similar to Ltd)
BW (CC)	Burgerlijk Wetboek - The Dutch Civil Code
CV	Commanditaire Vennootschap - (Dutch version of a) Limited Partnership
DNB	De Nederlandsche Bank - The Central Bank of the Netherlands
DCC	Dutch Civil Code
EC	European Commission
ESEF	European Single Electronic Format
ESMA	European Securities and Markets Authority
EU	European Union
FAS	Financial Accounting Standards
FASB	Financial Accounting Standards Board
GAAP	Generally Accepted Accounting Principles
IAS	International Accounting Standards
IASB	International Accounting Standards Board
IASC	International Accounting Standards Committee
IOSCO	International Organization of Securities Commissions
IFRIC	International Financial Reporting Interpretations Committee
IFRS	International Financial Reporting Standards
NV	Naamloze vennootschap - Public limited liability company (similar to plc)
OOB (PIE)	Organisatie van Openbaar Belang - Public interest entity
RJ (DASB)	Raad voor de Jaarverslaggeving - Dutch Accounting Standards Board
RJ (DAS)	Richtlijnen voor de Jaarverslaggeving - Dutch accounting standards (for large and medium-sized legal entities)
RJk	Richtlijnen voor de Jaarverslaggeving - Dutch accounting standards (for micro and small legal entities)
RvC (SB)	Raad van Commissarissen - Supervisory Board
SBR	Standard Business Reporting
SIC	Standing Interpretations Committee
US GAAP	United States Generally Accepted Accounting Principles
VOF	Vennootschap Onder Firma - (Dutch version of a) General Partnership
WED	Wet op de Economische Delicten - Economic Offences Act
Wft	Wet op het financieel toezicht - Financial Supervision Act
XBRL	eXtensible Business Reporting Language

## List of IFRS Accounting Standards in issue as of 1 January 2024

Reference	Standard / Interpretation
IFRS 1	First-time Adoption of International Financial Standards
IFRS 2	Share-based Payment
IFRS 3	Business Combinations
IFRS 5	Non-current Assets Held for Sale and Discontinued Operations
IFRS 6	Exploration for and Evaluation of Mineral Assets
IFRS 7	Financial Instruments: Disclosures
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 14	Regulatory Deferral Accounts
IFRS 15	Revenue from Contracts with Customers
IFRS 16	Leases
IFRS 17	Insurance Contracts
IFRS 18	Presentation and Disclosure in Financial Statements
IFRS 19	Subsidiaries without Public Accountability: Disclosures
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 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 24	Related Party Disclosures
IAS 26	Accounting and Reporting by Retirement Benefit Plans
IAS 27	Separate Financial Statements

Reference	Standard / Interpretation
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
IAS 41	Agriculture
IFRIC 1	Changes in Existing Decommissioning, Restoration and Similar Liabilities
IFRIC 2	Members' Shares in Co-operative Entities and Similar Instruments
IFRIC 5	Rights to Interests arising from Decommissioning, Restoration and Environmental Rehabilitation Funds
IFRIC 6	Liabilities arising from Participating in a Specific Market – Waste Electrical and Electronic Equipment
IFRIC 7	Applying the Restatement Approach under IAS 29 Financial Reporting in Hyperinflationary Economies
IFRIC 10	Interim Financial Reporting and Impairment
IFRIC 12	Service Concession Arrangements
IFRIC 14	IAS 19 – Limit on a Defined Benefit Asset, Minimum Funding Requirements and their Interaction
IFRIC 16	Hedges of a Net Investment in a Foreign Operation
IFRIC 17	Distributions of Non-cash Assets to Owners
IFRIC 19	Extinguishing Financial Liabilities with Equity Instruments
IFRIC 20	Stripping Costs in the Production Phase of a Surface Mine
IFRIC 21	Levies
IFRIC 22	Foreign Currency Translations and Advance Consideration
IFRIC 23	Uncertainty over Income Tax Treatments
SIC-7	Introduction of the Euro
SIC-10	Government Assistance – No Specific Relation to Operating Activities
SIC-25	Income Taxes – Changes in the Tax Status of an Entity or its Shareholders
SIC-29	Service Concession Arrangements: Disclosures
SIC-32	Intangible Assets – Web Site Costs

## List of RJ in issue as of 1 January 2024

Reference	Standard / Interpretation
RJ 100	Introduction
RJ 110	Objectives and assumptions
RJ 115	Criteria for recognition and reporting information
RJ 120	Measurement bases
RJ 121	Impairments of assets
RJ 122	Measurement bases for foreign currencies
RJ 135	General accounting policies for the determination of the result
RJ 140	Changes in accounting policies
RJ 145	Changes in accounting estimates
RJ 150	Correction of errors
RJ 160	Events after the reporting date
RJ 170	Cessation and material uncertainty about the going concern assumption
RJ 190	Other main matters
RJ 210	Intangible fixed assets
RJ 212	Tangible fixed assets
RJ 213	Investment property
RJ 214	Financial fixed assets
RJ 215	Joint ventures
RJ 216	Business combinations
RJ 217	Consolidation
RJ 220	Inventories
RJ 221	Construction contracts
RJ 222	Receivables
RJ 224	Prepayments and accrued income
RJ 226	Securities
RJ 228	Cash and cash equivalents
RJ 240	Equity
RJ 252	Provisions, contingent liabilities and contingent assets
RJ 254	Liabilities
RJ 258	Accruals and deferred income
RJ 260	Treatment of results on intragroup transactions in the financial statements
RJ 265	Statement of the comprehensive income
RJ 270	The income statement
RJ 271	Employee benefits
RJ 272	Income taxes
RJ 273	Interest charges

Reference	Standard / Interpretation
RJ 274	Government grants and other forms of state aid
RJ 275	Share-based payment
RJ 290	Financial instruments
RJ 292	Leases
RJ 305	Exemptions for group companies
RJ 315	Exemptions for medium-sized legal entities
RJ 330	Related parties
RJ 340	Earnings per share
RJ 345	Discontinued operations
RJ 350	Segmented information
RJ 360	The cash flow statement
RJ 390	Other information to be disclosed in the notes
RJ 394	Interim reports
RJ 400	Management Board report
RJ 404	Pay and benefits report and remuneration report
RJ 405	Report of the Supervisory Board
RJ 430	Key figures, key ratios and multi-annual review
RJ 500	Country-by-country reporting
RJ 600	Banks
RJ 605	Insurers
RJ 610	Pension funds
RJ 611	Premium Pension institutions
RJ 615	Investment entities
RJ 620	Cooperatives
RJ 630	Commercial foundations and associations
RJ 640	Not-for-profit organisations
RJ 645	Licensed public sector housing institutions
RJ 650	Fundraising institutions
RJ 655	Care providers, youth aid providers and certified institutions
RJ 660	Educational institutions



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