

| | Questions | Réponses | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|-----------------|---|---|---|---|---|---|---------------------------------|--|--|--|--|---|--|----------------------------|--|--|--|--|---|--|---|--|--|--|--|---|--|------------------------------|--|--|--|---|--|--|--------------------------|--|--|--|---|--|--|---|
| I. Assessing the fitness of the EU public reporting framework overall | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | <p>Do you think that the EU public reporting requirements for companies, taken as a whole, have been effective in achieving the intended objectives?</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Ensuring stakeholder protection</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Developing internal market</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Promoting integrated EU capital markets</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Ensuring financial stability</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Promoting sustainability</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1= totally disagree; 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Ensuring stakeholder protection | | | | | X | | Developing internal market | | | | | X | | Promoting integrated EU capital markets | | | | | X | | Ensuring financial stability | | | | X | | | Promoting sustainability | | | | X | | | <p>En fixant les obligations applicables aux sociétés européennes en matière de comptes annuels et consolidés, d'audit, et d'informations à destination des marchés, le cadre européen permet de répondre aux objectifs de protection de l'ensemble des parties prenantes, de développement du marché intérieur et mise en place d'un marché européen des capitaux. Ce cadre est également adapté aux besoins des différentes catégories de sociétés dans la mesure où les obligations sont différentes pour les sociétés cotées et non cotées, et au sein des sociétés non cotées, les obligations sont proportionnées à la taille des sociétés.</p> <p>Les actions en cours au niveau européen dans le cadre du Plan d'action pour la finance verte permettront de répondre aux objectifs de stabilité financière et de finance durable.</p> <p>De même, les initiatives en matière d'informations non financières, de prise en compte des questions de durabilité sont récentes (directive 2014-95 applicable en 2018) , le bilan de ces actions ne peut être totalement réalisé à ce stade.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ensuring stakeholder protection | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Developing internal market | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Promoting integrated EU capital markets | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ensuring financial stability | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Promoting sustainability | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | <p>Do you think that the EU public reporting requirements for companies, taken as a whole, are relevant (necessary and appropriate) for achieving the intended objectives?</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Ensuring stakeholder protection</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Developing internal market</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Promoting integrated EU capital markets</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Ensuring financial stability</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Promoting sustainability</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1= totally disagree; 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Ensuring stakeholder protection | | | | | X | | Developing internal market | | | | | X | | Promoting integrated EU capital markets | | | | | X | | Ensuring financial stability | | | | X | | | Promoting sustainability | | | | X | | | <p>Le cadre européen applicable aux sociétés est pertinent dans la mesure où il prend en compte les différents besoins des entreprises (sociétés cotées ou non cotées) et leur taille. Concernant les sociétés cotées, ce cadre européen a contribué au développement du marché unique en Europe, permet aux entreprises de réaliser des opérations au sein de l'Union et assure un niveau de saine concurrence entre les sociétés cotées européennes.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ensuring stakeholder protection | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Developing internal market | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Promoting integrated EU capital markets | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ensuring financial stability | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Promoting sustainability | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| 3 | <p>Companies would normally maintain and prepare a level of information that is fit for their own purposes, in a "business as usual situation". Legislation and standards tend to frame this information up to a more demanding level.</p> <table border="1" data-bbox="232 236 999 488"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>With regards to the objectives pursued, do you think that the EU legislation and standards on public reporting are efficient (i.e. costs are proportionate to the benefits generated)?</td> <td></td> <td></td> <td>X</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | With regards to the objectives pursued, do you think that the EU legislation and standards on public reporting are efficient (i.e. costs are proportionate to the benefits generated)? | | | X | | | | <p>Comme indiqué précédemment, le cadre européen applicable au reporting des sociétés tient compte des besoins et de la taille des entreprises en prévoyant des obligations proportionnées. Toutefois, il conviendrait de revoir l'articulation entre les différentes directives pour éviter tout chevauchement dans la fourniture d'informations, de rapport, chevauchements inutiles et source de coûts injustifiés.</p> | | | | | | | | | | | | | | | | | | | | | |
|---|---|------------|---|---|---|---|---|---|---|--|--|---|---|--|--|--|--|--|--|---|--|--|--|--|--|--|---|--|--|--|--|--|--|--|--|---|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| With regards to the objectives pursued, do you think that the EU legislation and standards on public reporting are efficient (i.e. costs are proportionate to the benefits generated)? | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | <p>If you are a preparer company, could you please indicate the annual recurring costs (in € and in relation to the total operational cost) incurred for the preparation, audit (if any) and publication of mandatory public reporting.</p> | <p>N/A</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | <p>Coherence Do you agree that the intrinsic coherence of the EU public reporting framework is fine, having regard to each component of that reporting?</p> <table border="1" data-bbox="232 817 999 1260"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Financial statements (preparation, audit and publication)</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Management report (preparation, consistency check by a statutory auditor, publication)</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Non-financial information (preparation, auditor's check and publication)</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Country-by-country reporting by extractive / logging industries (preparation, publication)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> </tbody> </table> <p><i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Financial statements (preparation, audit and publication) | | | | X | | | Management report (preparation, consistency check by a statutory auditor, publication) | | | | X | | | Non-financial information (preparation, auditor's check and publication) | | | | X | | | Country-by-country reporting by extractive / logging industries (preparation, publication) | | | | | | X | <p>En matière de préparation, d'audit et de publication des comptes des sociétés, le cadre européen est cohérent et permet d'assurer un « level playing field » en Europe et un haut degré de comparabilité entre sociétés.</p> <p>Concernant le rapport de gestion et les informations financières, un cadre général est fixé par les directives, laissant aux Etats Membres, la possibilité de détailler et de préciser son contenu en fonction de ses besoins. De même pour les informations non financière, le cadre européen pose des grands principes et des « guidelines » permettant aux entreprises d'adapter leur communication en la matière. Il est possible que des références et pratiques sectorielles s'instaurent à l'avenir.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Financial statements (preparation, audit and publication) | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Management report (preparation, consistency check by a statutory auditor, publication) | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Non-financial information (preparation, auditor's check and publication) | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Country-by-country reporting by extractive / logging industries (preparation, publication) | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| 6 | <p>Depending on circumstances, a company may have public reporting obligations on top of those being examined here. Such legislation may have been developed at the EU, national or regional level. Should you have views on the interplay of these additional reporting obligations with the policies examined in this consultation, please comment below and substantiate it with evidence or concrete examples.</p> | N/A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|-----|---|---|---|---|---|---|---------------------------------|--|--|--|--|---|--|----------------------------|--|--|--|--|---|--|---|--|--|--|--|---|--|------------------------------|--|--|--|--|---|--|--------------------------|--|--|--|--|---|--|--|
| 7 | <p>EU added value Do you think that, for each respective objective, the EU is the right level to design policies in order to obtain valuable results, compared to unilateral and non-coordinated action by each Member State?</p> <table border="1" data-bbox="230 448 999 735"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Ensuring stakeholder protection</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Developing internal market</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Promoting integrated EU capital markets</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Ensuring financial stability</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Promoting sustainability</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table> <p><i>1= totally disagree; 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Ensuring stakeholder protection | | | | | X | | Developing internal market | | | | | X | | Promoting integrated EU capital markets | | | | | X | | Ensuring financial stability | | | | | X | | Promoting sustainability | | | | | X | | L'échelon européen est le niveau adéquat pour fixer les orientations et les objectifs cités. |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ensuring stakeholder protection | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Promoting integrated EU capital markets | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ensuring financial stability | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Promoting sustainability | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

II. The financial reporting framework applicable to all EU companies

8

Companies operating cross-border

In your view, to what extent do the addition of, and differences in, national reporting rules hinder the ability of companies to do cross border business within the EU single market?

- Differences seriously hinder the ability to do business within the EU
- Differences hinder to some extent
 - Differences do not hinder the ability to do business within the EU / are not significant
- Don't know / no opinion / not relevant

Please explain your response and substantiate it with evidence or concrete examples.

Voir Annexe 1- partie 1.2

Les différences nationales en matière de reporting ne constituent pas un obstacle à une implantation ou à l'exercice d'activité commerciale dans un autre Etat membre.

Le facteur principal d'exercice d'activités commerciales transfrontalières est l'existence d'un marché ou pas dans l'autre Etat membre.

Les différences de réglementation en matière de reporting ne sont à cet égard pas essentielles. C'est une difficulté technique mais qui ne constitue en aucun cas un obstacle au développement des affaires.

Au sein du marché unique, l'Union européenne met en œuvre des règles harmonisées pour favoriser les échanges économiques infra européens tout en respectant les spécificités de chaque Etat et le principe de subsidiarité. Afin de développer les activités économiques transfrontalières au sein de ce marché, il convient d'identifier les principaux leviers utiles dans ce cadre. A cet égard, les différences de reporting ne sont pas de cet ordre.

Des règles unifiées spécifiques aux entreprises menant des activités transfrontalières ne sont pas nécessaires

La création d'un cadre comptable spécifique pour les entreprises réalisant des opérations transfrontalières n'est pas à envisager. Il implique qu'une entreprise se développant à l'international et qui en définitive échouerait serait conduite à changer de règles comptables applicables.

Les différentes règles nationales de reporting : une difficulté à relativiser selon la taille des entreprises ?

Les différences de réglementations nationales, notamment de reporting, sont plus lourdes à gérer pour les petites entreprises que pour les grandes. Celles-ci ont une capacité plus importante à gérer la complexité et les coûts en résultant. Cela étant, les petites et moyennes entreprises n'ont pas toutes vocation à mener des activités transfrontalières.

Dès lors, s'agissant de l'information financière, il convient non pas de tendre vers des règles spécifiques aux entreprises ayant des activités transfrontalières mais plutôt vers des règles simplifiées pour les plus petites pour leur faciliter l'accès au marché unique.

L'unicité des principes comptables pour les comptes sociaux apparaît nécessaire : toutes les entreprises appliquent les mêmes normes sous réserve de simplification selon la taille des entreprises.

9

To what extent do you think that the following differences, because they affect public reporting by companies, are significant impediments to cross-border establishment in the EU?

| Areas covered by EU requirements | 1 | 2 | 3 | 4 | 5 | 6 |
|---|---|---|---|---|---|---|
| Differences and lacunas in accounting standards or principles | X | | | | | |
| Differences in corporate governance standards | X | | | | | |
| Differences and overlaps arising from the presentation of the financial statements (balance sheet, etc.) | X | | | | | |
| Differences arising from publication rules / filing with business registers (publication deadlines, publication channels, specifications) | X | | | | | |
| Differences arising from audit requirements | X | | | | | |
| Differences arising from dividends distribution rules or capital maintenance rules | X | | | | | |

1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know

| Areas not covered by EU requirements | 1 | 2 | 3 | 4 | 5 | 6 |
|---|---|---|---|---|---|---|
| Differences arising from specific bookkeeping requirements such as charts of accounts, audit trail requirements, data storage and accessibility | X | | | | | |
| Differences arising from language requirements (Bookkeeping documentation, publication of | X | | | | | |

Voir Annexe 1 – partie 1.3

Les différences nationales en matière de reporting financier ne sont pas un obstacle à l'installation en Europe.

Les principaux obstacles au développement transfrontalier sont plus liés aux marchés (existence, accès) ou aux différences linguistiques. Les différences en matière d'information financière ne sont pas de cet ordre.

Avant d'aller plus avant vers une harmonisation comptable accrue, il faut se demander quels sont les besoins et les impacts.

Il convient de distinguer les entreprises européennes appliquant les normes IFRS pour lesquels l'harmonisation comptable est réalisée et permet de répondre aux besoins d'information financière des marchés et les autres entreprises qui n'ont pas besoin d'une harmonisation européenne plus poussée. Pour celles-ci, les comptes sociaux doivent répondre à des besoins différents (fiscaux, juridiques (distribution), informations des salariés et des banques).

Unifier plus avant l'information financière et comptable pourrait indirectement accroître la complexité et les coûts pour les entreprises. Ainsi, avoir une base comptable plus unifiée n'induirait-elle pas par exemple de mettre en place d'autres états pour répondre aux besoins des parties prenantes (administrations fiscales, salariés....) Cela créerait une complexité et un coût supplémentaire pour les entreprises, et en particulier les plus petites. Ce serait contraire aux objectifs poursuivis par l'Union européenne.

Toutefois, il ne faut pas écarter toute initiative visant à des travaux d'harmonisation, de revue de la directive comptable à condition que l'objectif de cette révision soit clairement défini.

| | <table border="1"> <tr> <td>financial statements)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Differences arising from the determination of taxable profit</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Differences arising from digital filing requirements (for instance taxonomies used)</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Differences arising from software specifications</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p><i>1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | financial statements) | | | | | | | Differences arising from the determination of taxable profit | X | | | | | | Differences arising from digital filing requirements (for instance taxonomies used) | X | | | | | | Differences arising from software specifications | X | | | | | | |
|--|--|-----------------------|---|---|---|---|--|---|--|---|--|--|--|--|--|---|---|--|--|--|---|--|--|---|--|--|--|--|--|--|
| financial statements) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Differences arising from the determination of taxable profit | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Differences arising from digital filing requirements (for instance taxonomies used) | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Differences arising from software specifications | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | <p>How do you evaluate the impact of any hindrances to cross border business on costs relating to public reporting by companies?</p> <p><input checked="" type="radio"/> The impact of hindrances on costs are negligible or not significant</p> <p><input type="radio"/> The impact of hindrances on costs are somehow significant</p> <p><input type="radio"/> The impact of hindrances on costs are very significant</p> <p><input type="radio"/> Don't know / no opinion / not relevant</p> | | | | | | Il s'agit de coûts supportables. Il peut y avoir des zones de simplification mais il n'est pas nécessaire pour cela de tout remettre en cause. | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | <p>On top of differences in national accounting rules, national tax laws will usually require the submission of a tax return in compliance with self-standing national tax rules, adding another layer of reporting standard.</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Once a Common Corporate Tax Base is adopted at the EU level, would you consider that the profit before tax reported in the Profit or Loss statement and the determination of the taxable profit should be further aligned across EU Member States?</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Once a Common Corporate Tax Base is adopted at the EU level, would you consider that the profit before tax reported in the Profit or Loss statement and the determination of the taxable profit should be further aligned across EU Member States? | X | | | | | | | | | | | <p>En France, il existe un principe de connexion forte entre la comptabilité et la fiscalité.</p> <p>Pour les besoins de l'imposition des bénéficiaires, les entreprises doivent respecter les définitions édictées par la norme comptable nationale, sauf exception prévue par le droit fiscal. L'expérience française démontre que gérer ces discordances est aisé pour les entreprises. Il est autrement plus complexe de gérer deux référentiels complètement différents : l'un comptable, l'autre fiscal. La comptabilité est la mesure de la performance économique. De ce fait, elle doit être la base de la fiscalité.</p> <p>La fiscalité assise sur la performance des entreprises doit tout naturellement se baser sur la comptabilité. Il en est de même pour les règles de distribution qui sont aussi assises sur les comptes sociaux. Les normes fiscales et comptables doivent avancer en parallèle afin de limiter les coûts pour les entreprises et créer un environnement qui fasse sens.</p> <p>Le choix d'une connexion entre la comptabilité et la fiscalité implique la production de comptes sociaux selon le même référentiel pour toutes les entreprises. S'il doit y avoir une connexion entre fiscalité et comptabilité, ce que l'ANC soutient, elle doit se faire de façon coordonnée.</p> | | | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| Once a Common Corporate Tax Base is adopted at the EU level, would you consider that the profit before tax reported in the Profit or Loss statement and the determination of the taxable profit should be further aligned across EU Member States? | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

12

As regards the **preparation of consolidated and individual financial statements** how do you assess the ability of the following approaches to reduce barriers to doing business cross-borders?

| | 1 | 2 | 3 | 4 | 5 | 6 |
|---|---|---|---|---|---|---|
| The EU should reduce the variability of standards from one Member State to another through more converged national GAAPs, possibility by removing options currently available in the EU accounting legislation. | | X | | | | |
| The EU should reduce the variability of standards from one Member State to another by converging national GAAPs on the basis of a European Conceptual Framework. | X | | | | | |
| The EU should reduce the variability of standards from one Member State to another by converging national GAAPs and in addition by addressing current lacunas in the Accounting Directive (leases, deferred taxes....) | X | | | | | |
| The EU should reduce the variability of standards from one Member State to another by establishing a "pan-EU Gaap" available to any company that belongs to a group. Such "pan- EU-GAAP" may be the IFRS, IFRS for SMEs, or another standard commonly agreed at the EU level. | X | | | | | |
| Do nothing | | | | | | |
| Other | | | | | | |

Voir Annexe 1

1ère question : Au préalable, un état des lieux de l'utilisation des options existantes par les Etats membres est indispensable. La directive comptable unique 2013/34 fournit d'ores et déjà un socle commun de règles, certes avec des options. Cependant, celles-ci sont en nombre réduit par rapport aux directives auxquelles elle s'est substituée.

Il serait utile qu'au préalable à toute nouvelle évolution, la Commission fasse un point auprès des Etats membres sur la mise en œuvre des options ouvertes par la directive. Cela permettrait de mesurer la réalité des divergences et les moyens pour les atténuer.

En effet, une éventuelle convergence accrue pourrait consister non pas forcément en réduisant le nombre de ces options mais en encadrant plus précisément leurs modalités d'utilisation. Il s'agirait de réduire la portée trop générale des options et de renforcer la cohérence avec les principes généraux de la directive.

2ème question : L'éventuel besoin de principes généraux pourrait être satisfait en introduisant ceux-ci dans la directive, non en y ajoutant un cadre conceptuel.

La directive comptable unique repose déjà sur des principes généraux sous-jacents ou insuffisamment définis. Préciser et développer la portée de ces principes serait facteur d'harmonisation accrue au sein de l'Union européenne. Voir Question 22.

3ème question : Avant toute modification de la directive, il conviendrait de fixer clairement les objectifs. Par ailleurs, la directive doit rester un cadre général pour les Etats membres chargés de mettre en place des normes comptables plus précises. Introduire des dispositions relatives aux contrats de location, aux impôts différés conduirait à modifier le cadre européen et à faire de la directive un jeu de normes.

4ème question : L'introduction d'un référentiel complémentaire pan européen pour les groupes nuirait aux objectifs d'harmonisation et de prise en compte de l'intérêt européen, ce d'autant plus que sa maintenance et son évolution ne dépendraient pas de l'Union européenne (si le référentiel IFRS PME était retenu). Concernant le référentiel IFRS, il convient de rappeler que les Etats membres peuvent en vertu du règlement IFRS, l'imposer ou l'autoriser pour l'élaboration des comptes annuels et consolidés des sociétés non cotées.

L'application d'une norme pan européenne, qui serait au choix des groupes non cotés, ne contribuera pas à simplifier l'exercice d'activité économique au travers de l'Europe. En effet, les entreprises devront faire dans chaque Etat un reporting pour les besoins de la fiscalité et de la détermination des distributions. En d'autres termes, cela reviendra à multiplier les obligations de reporting des entreprises.

Cela constituerait une rupture d'égalité : ainsi, deux entreprises d'un même Etat membre ne seront pas dans la même situation selon leur appartenance ou pas à un groupe.

| <p>13</p> | <p>As regards the publication of individual financial statements, the Accounting Directive (Article 37) allows any Member State to exempt the subsidiaries of a group from the publication of their individual financial statements if certain conditions are met (inter alia, the parent must declare that it guarantees the commitments of the subsidiary). Would you see a need for the extension of such exemption from a Member State option to an EU wide company option?</p> <p><input type="radio"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="radio"/> Don't know</p> | <p>Une proposition qui crée une différence de traitement entre entreprises selon qu'elles sont filiales d'un groupe ou pas.</p> <p>Cela poserait des différences de traitement entre entreprises. Ainsi, deux entreprises d'un même Etat membre ne seront pas dans la même situation selon leur appartenance ou pas à un groupe, d'autant que l'option serait entre les mains des entreprises, non plus des Etats.</p> <p>Une proposition dont les conditions restent à préciser</p> <p>Cette proposition soulève de nombreuses questions.</p> <p>L'article 37 de la DCU permet aux Etats membres d'exempter les entreprises d'appliquer les dispositions de la directive relatives au contenu, au contrôle et à la publication des états financiers. L'exemption suggérée ne porterait donc pas que sur la publication.</p> <p>En outre, l'exemption n'est possible aujourd'hui que sous réserve de respecter des conditions très restrictives, qui ne semblent pas être remises en cause.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|------------------|--|---|---|---|---|---|---|---|--------------|--|--|--|--|---|--|-------|--|--|--|--|---|--|-------|--|--|--|--|---|--|--|
| <p>14</p> | <p>SME</p> <p>Do you agree that the EU approach is striking the right balance between preparers' costs and users' needs, considering the following types of companies?</p> <table border="1" data-bbox="248 863 1016 1069"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Medium sized</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Small</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Micro</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | Medium sized | | | | | X | | Small | | | | | X | | Micro | | | | | X | | <p>L'autorité des normes comptables soutient la démarche de proportionnalité selon la taille des entreprises, portée par la directive comptable 2013/34.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| Medium sized | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | |
| Small | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | |
| Micro | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | | | | | |
|---|---|---|----------|----------|----------|----------|----------|----------|---|
| 15 | Thresholds | | 1 | 2 | 3 | 4 | 5 | 6 | <p>Voir Annexe 1 – partie 1.4</p> <p>Les seuils prévus par la directive comptable sont appropriés et ne nécessitent pas d'être modifiés.</p> <p>Cela étant, les seuils prévus dans la directive paraissent appropriés : il n'y a pas lieu de les modifier.</p> |
| | In general, should the EU strive to use a single definition and unified metrics to identify SMEs across all the EU policy areas? | | | | X | | | | |
| | In particular, should the EU strive to align the SME definition metrics in the Accounting Directive with those in Recommendation 2003/361/EC? | X | | | | | | | |
| 16 | Relevance of the content of financial reporting | | 1 | 2 | 3 | 4 | 5 | 6 | <p>Le cadre existant est approprié et ne doit pas être alourdi. Le cadre comptable s'insère dans un dispositif européen plus large qui couvre tous les aspects de l'information requise des entreprises.</p> <p>Annexe 1- partie 1.1</p> |
| | How do you think that the current EU framework as regards the content of financial reporting is relevant (necessary and appropriate), having regards to the following information | | | | | | | | |
| | A company's or group's strategy, business model, value creation | | | | | | X | | |
| | A company's or group's intangible assets , including goodwill, irrespective of whether these appear on the balance sheet or not | | | | | | X | | |
| | A company's or group's policies and risks on dividends , including amounts available for distribution | | | | | | X | | |
| A company's or group's cash flows | | | | | | X | | | |
| <i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know</i> | | | | | | | | | |

| <p>17</p> | <p>Is there any other information that you would find useful but which is not currently published by companies?</p> <p><input type="radio"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="radio"/> Don't know</p> | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|--|--|--|--|--|--|
| <p>18</p> | <p>Financial statements often contain alternative performance measures such as the EBITDA. (An APM is a financial measure of historical or future financial performance, financial position, or cash flows, other than a financial measure defined or specified in the applicable financial reporting framework.)</p> <table border="1" data-bbox="228 662 1003 842"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Do you think that the EU framework should define and require the disclosure of the most commonly used alternative performance measures?</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1= totally disagree; 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Do you think that the EU framework should define and require the disclosure of the most commonly used alternative performance measures? | X | | | | | | <p>Il n'est pas nécessaire de réglementer plus la définition des indicateurs alternatifs de performance (IAP). C'est à l'entreprise d'expliquer les APM utilisés de manière précise.</p> <p>Les APM permettent aux entreprises d'avoir une communication financière adaptée à leurs spécificités et de ce fait pertinente.</p> <p>Si encadrement il doit y avoir, il ne doit insister que sur les caractéristiques que doivent avoir les APM utilisés (être clairement définis et expliqués par l'entreprise à des fins de transparence et de compréhension).</p> <p>Il ne doit en revanche pas définir précisément leur contenu, au risque de retirer à ces IAP leur utilité pour les entreprises de représenter au mieux leur activité selon leur point de vue.</p> <p>Dès lors, les orientations de l'ESMA relatives aux indicateurs alternatifs de performance (ESMA/2015/1415057) paraissent à cet égard suffisantes.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | |
| Do you think that the EU framework should define and require the disclosure of the most commonly used alternative performance measures? | X | | | | | | | | | | | | | | | |

III. The financial reporting framework for listed companies

| | | |
|------------------|---|---|
| <p>19</p> | <p>Given the different levels of commitment to require IFRS as issued by the IASB around the globe, is it still appropriate that the IAS Regulation prevents the Commission from modifying the content of IFRS?</p> <p><input type="radio"/> yes</p> <p><input checked="" type="radio"/> X No, due to the risk of uneven level playing field for EU companies vis-à-vis companies established in third countries that do not require the use of IFRS as issued by the IASB.</p> <p><input checked="" type="radio"/> X No, due to the risk that specific EU needs may not properly be addressed during the IASB standard setting process.</p> <p><input type="radio"/> ⊖ X No, due to other reasons.</p> <p><input type="radio"/> ⊖ Don't know / no opinion / not relevant</p> | <p>Voir annexe 5</p> <p>Il ne faut pas exclure le carve-in.</p> <p>Par rapport à l'objectif d'harmonisation qu'elle s'est fixée, et dans le cadre de la délégation qu'elle a donnée, l'UE doit mettre en œuvre toutes les solutions possibles de dialogue avec l'IASB. Néanmoins, l'éventualité d'un échec ne peut être écartée.</p> <p>Le carve-in, au même titre qu'un autre moyen d'adapter les normes IFRS, signe l'échec de ce dialogue du fait de l'une ou l'autre des parties, voire des deux. Tout doit être mis en œuvre pour qu'un tel échec ne soit pas imputable à l'UE. Mais elle doit y être préparée. L'Europe n'a pas de raison de s'interdire un outil complémentaire dans l'adoption des IFRS.</p> |
| <p>20</p> | <p>Since the adoption of IFRS by the EU in 2005, topics such as sustainability and long-term investment have come to the forefront of the regulatory agenda. Is the EU endorsement process appropriate to ensure that IFRS do not pose an obstacle to broader EU policy objectives such as sustainability and long-term investments?</p> <p><input type="radio"/> ⊖ Yes</p> <p><input type="radio"/> ⊖ No</p> <p><input type="radio"/> ⊖ Don't know</p> | <p>Voir annexe 5</p> <p>Il n'est pas nécessaire de modifier les critères d'adoption.,</p> <p>Il est vrai que certains enjeux, comme la finance durable, la compétitivité, ont pris une importance qui n'était probablement pas envisagée à l'origine. Néanmoins, ces enjeux se retrouvent très bien dans une définition actualisée et élargie du « Bien public Européen ». Il est possible d'affiner cette conception sans revoir pour autant les critères d'adoption.</p> <p>Par ailleurs, la normalisation comptable évolue vers davantage de « doctrine » pour accompagner l'application des normes. Il apparaît aujourd'hui indispensable que l'UE adapte la nature et le périmètre de ses travaux d'adoption à cette doctrine élargie.</p> |
| <p>21</p> | <p>How could the EU ensure that IFRS do not pose an obstacle to sustainability and long term investments:</p> <p><input type="radio"/> ⊖ By retaining the power to modify the IFRS standards in well-defined circumstances</p> <p><input type="radio"/> ⊖ By making explicit in the EU regulatory framework that in order to endorse IFRS that are conducive to the European public good, sustainability and long term investment must be considered</p> <p><input type="radio"/> ⊖ Other, please specify</p> | <p>Voir Annexe 6</p> <p>Enrichir la définition du « Bien public Européen »</p> <p>Comme l'ont relevés les récents rapports de l'UE (HLEG), et les débats lors de l'adoption de récentes normes, il convient d'anticiper les effets transformatifs du référentiel comptable.</p> <p>Outre l'accent mis sur les études d'impact, cette exigence invite à réfléchir au modèle économique sous-jacent aux conventions comptables : information essentiellement destinée aux « investisseurs », accent mis sur le caractère négociable et donc immédiatement disponible, désincitation pour les entreprises à assumer certains risques (financiers,</p> |

| | <input type="radio"/> Don't know | industriels, ...) pour les sortir du « marché » et les faire peser sur la communauté,... Dans cette perspective, il est indispensable d'élargir les objectifs du « bien public européen » à la finance durable, tout en précisant les contours de celle-ci. | | | | | | | | | | | | | | |
|--|--|--|---|---|---|---|---|---|--|---|--|--|--|--|--|--------------------------------|
| 22 | <p>The True and Fair view principle should be understood in the light of the general accounting principles set out in the Accounting Directive. By requiring that, in order to be endorsed, any IFRS should not be contrary to the true and fair view principle, a link has been established between IFRS and the Accounting Directive. However, the principle of true and fair view is not laid down in great detail in the Accounting Directive, nor is it underpinned by e.g. a European Conceptual Framework that would translate these principles into more concrete accounting concepts such as recognition and measurement, measurement of performance, prudence, etc. Do you think that an EU conceptual framework should underpin the IFRS endorsement process?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Don't know</p> <p>If you answered NO please explain your position</p> | <p>Voir Annexe 7</p> <p>L'ANC estime qu'il n'y a pas lieu de prévoir un cadre conceptuel européen à proprement parler, la directive comptable unique constituant déjà un cadre général sur lequel se fondent les États Membres d'une part pour établir leurs normes comptables locales et d'autre part pour analyser toute norme internationale lors de la procédure d'adoption. En revanche, l'ANC estime qu'il est utile de constamment préciser et développer le contenu et la portée des principes généraux qui constituent le socle de la Directive unique. L'harmonisation comptable au sein de l'Union Européenne peut en effet encore progresser, elle peut lui permettre d'approfondir une identité dont les fondements sont souvent déjà présents dans ses textes fondateurs.</p> | | | | | | | | | | | | | | |
| 23 | <p>The EU has not endorsed the IASB Conceptual Framework for Financial Reporting. The conceptual framework is a set of concepts used to develop IFRSs but can also be helpful in interpreting how IFRS standards have to be understood and applied in specific circumstances. This could enhance a common application of IFRSs within the EU.</p> <table border="1" data-bbox="248 1139 1016 1289"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Should the EU endorse the IASB Conceptual Framework for Financial Reporting?</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Should the EU endorse the IASB Conceptual Framework for Financial Reporting? | X | | | | | | <p>Voir question 22</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | |
| Should the EU endorse the IASB Conceptual Framework for Financial Reporting? | X | | | | | | | | | | | | | | | |

| <p>24</p> | <p>Contrary to the Accounting Directives the EU endorsed IFRSs do not require companies to present financial information using a prescribed (minimum) lay-out for the balance sheet and income statement. Mandatory use of minimum layouts could enhance comparability of human readable financial statements (Electronic structured data reporting based on the IFRS taxonomy have an implicit layout as relationships between elements for which amounts shall be presented are defined).</p> <table border="1" data-bbox="248 357 1016 571"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Do you agree that prescribed (minimum) layouts enhance comparability of financial statements for users and should therefore be introduced for companies using IFRS</td> <td></td> <td></td> <td>X</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> <p>Please explain your response and substantiate it with evidence or concrete examples.</p> | | 1 | 2 | 3 | 4 | 5 | 6 | Do you agree that prescribed (minimum) layouts enhance comparability of financial statements for users and should therefore be introduced for companies using IFRS | | | X | | | | <p>Voir Annexe 8</p> <p>Oui pour des formats indicatifs, mais non prescriptifs</p> <p>Il peut être utilement tenu compte des travaux actuels de l'IASB sur le format des états de synthèse avant d'entreprendre d'actualiser les formats prévus dans la directive.</p> <p>Si la référence à un format structuré peut-être très utile (ne serait-ce que par simplicité pour les PME en particulier), on peut s'interroger sur le bien-fondé de les prescrire.</p> <p>Un cadre contraint permet de gagner en uniformité (utile à l'informatisation et la comparaison) mais entraîne le risque qu'une information sortie de son contexte spécifique perde en substance.</p> | | | | | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|--|--|--|---|--|--|--|--|--|--|--|--|--|--|-------------------------------------|--|--|--|--|--|--|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| Do you agree that prescribed (minimum) layouts enhance comparability of financial statements for users and should therefore be introduced for companies using IFRS | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>25</p> | <p>Transparency Directive</p> <p>Do you agree that the Transparency Directive requirements are effective in meeting the following objectives, notably in light of increased integration of EU securities markets?</p> <table border="1" data-bbox="248 943 1016 1177"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Protect investors</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Contribute to integrated EU capital markets</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Facilitate cross border investments</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Protect investors | | | | | | | Contribute to integrated EU capital markets | | | | | | | Facilitate cross border investments | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| Protect investors | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Contribute to integrated EU capital markets | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Facilitate cross border investments | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | | | |
|----|---|--|----------|----------|----------|----------|----------|
| 26 | Transparency Directive | | | | | | |
| | Do you agree that abolishing the quarterly reporting requirement in 2013 by issuers contributed to the following? | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | Reducing administrative burden, notably for SMEs | | | | | | |
| | Promoting long-term investment (i.e. discouraging the culture of short-termism on financial markets) | | | | | | |
| | Promoting long-term and sustainable value creation and corporate strategies | | | | | | |
| | Maintaining an adequate level of transparency in the market and investors' protection | | | | | | |
| | | <i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i> | | | | | |
| 27 | Do you consider that the notifications of major holdings of voting rights in their current form is effective in achieving the following? | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | Strengthening investor protection | | | | | | |
| | Preventing possible market abuse situations | | | | | | |
| | | <i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i> | | | | | |

| | | | | | | | |
|---|---|----------|----------|----------|----------|----------|----------|
| 28 | Do you agree that the disclosure and notification regime of major holdings of voting rights in the Transparency Directive is overall coherent with the following EU legislation? | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | Coherent with EU company law | | | | | | |
| | Coherent with the shareholders' rights directive | | | | | | |
| | Coherent with the obligation to disclose managers' transactions under Article 19 of the Market Abuse Regulation | | | | | | |
| Coherent with other EU legislation | | | | | | | |
| <i>1= totally disagree; 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree; 6= don't know</i> | | | | | | | |
| 29 | <p>As regards the following areas, did you identify a lack of coherence of legislation from one Member State to another that could jeopardise to some extent the objectives of investor protection, integrated capital markets and cross-border investment?</p> <p><input type="radio"/> Yearly and half-yearly financial information</p> <p><input type="radio"/> On-going information on major holdings of voting rights</p> <p><input type="radio"/> Ad hoc information disclosed pursuant to the Market Abuse Directive</p> <p><input type="radio"/> Administrative sanctions and measures in case of breaches of the Transparency Directive requirements</p> <p><input type="radio"/> Don't know / no opinion / not relevant</p> | | | | | | |

| | | |
|-----------|---|--|
| 30 | Should anything be done to improve public reporting by listed companies (documents, information, frequency, access, harmonisation, simplification)? | |
|-----------|---|--|

IV. The EU financial reporting for banks and insurance companies

| Bank accounts directive | | | | | | | |
|---|--|--|---|---|---|---|---|
| 31 | Do you agree with the following statements: | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | The BAD is still sufficiently effective to meet the objective of comparability | | | | X | | |
| | The BAD is still sufficiently relevant (necessary and appropriate) to meet the objective of comparability | | | | X | | |
| | The costs associated with the BAD are still proportionate to the benefits it has generated | | | | X | | |
| | The current EU legislative public reporting framework for banks is sufficiently coherent | | | | X | | |
| <p><i>1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> <p>Please explain your response and substantiate it with evidence or concrete examples.</p> | | | | | | | |
| | | <p>Voir Annexe 9</p> <p>Il est nécessaire de conserver au niveau européen un cadre applicable aux comptes des entreprises du secteur bancaire. Ce cadre permet d'assurer la comparabilité des comptes entre les établissements situés dans les pays n'ayant pas opté en vertu du règlement IAS pour l'application des normes IFRS pour les établissements bancaires. Ce cadre européen permet de tenir compte des spécificités européennes dans le domaine bancaire.</p> <p>Par ailleurs, c'est à partir des comptes sociaux que sont établis les distributions de dividendes, que sont déterminés les droits des créanciers et parfois le résultat taxable, ces éléments confirment le maintien de dispositions comptables spécifiques pour ce secteur au niveau européen.</p> <p>Toutefois la directive banque est une directive ancienne et il conviendrait a minima de la mettre à jour sur un plan légistique. Il pourrait être envisagé d'intégrer les dispositions particulières applicables aux banques (lex specialis) dans la directive unique (lex generalis).</p> <p>Sur le fonds, les dispositions prévues par cette directive sont toujours adaptées notamment pour l'élaboration des comptes annuels des établissements.</p> | | | | | |
| 32 | Do you agree with the following statement: | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | The BAD could be suppressed and replaced by a requirement for all EU banks to use IFRS | X | | | | | |
| <p><i>1=totally disagree; 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | | | | | | |
| | | <p>Voir Annexe 9</p> <p>En vertu du règlement IAS, les EM peuvent opter pour l'application des normes IFRS pour les entités du secteur bancaire pour l'établissement des comptes annuels et consolidés. Certains EM n'ont pas retenu cette option notamment pour l'établissement des comptes sociaux pour différentes raisons et notamment car dans certains EM les comptes sociaux servent de base à la détermination du résultat fiscal et des distributions. Appliquer les normes IFRS pour l'élaboration des comptes annuels des comptes conduirait les entreprises à établir un autre jeu de comptes pour répondre aux besoins juridiques et fiscaux et cela serait à rebours de l'objectif de simplification.</p> | | | | | |

| 33 | <p>Do you think that the objective of comparability of financial statements of banks using national GAAP could be improved by including accounting treatments in the BAD for:</p> <p>Expected Credit risk provisioning <input type="radio"/> YES <input checked="" type="radio"/> NO</p> <p>Leases <input type="radio"/> YES <input checked="" type="radio"/> NO</p> <p>Derivatives <input type="radio"/> YES <input checked="" type="radio"/> NO</p> <p>Other <input type="radio"/> YES <input checked="" type="radio"/> NO</p> | <p>Voir Annexe 9</p> <p>La majorité des établissements de crédit appliquent les normes IFRS pour l'établissement de leurs comptes consolidés, la comparabilité est donc mesurer à ce niveau-là. Pour les comptes annuels, les besoins ne sont pas les mêmes et la comparabilité entre pays de l'Union n'est pas recherchée.</p> <p>La directive BAD étant une application sectorielle de la directive unique, les traitements comptables mentionnés devrait être précisés dans la directive unique et non spécifiquement dans la directive banque.</p> | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|--|---|---|--|--|--|---|---|--|--|--|--|--|--|
| 34 | <p>Do you agree with the following statement:</p> <table border="1" data-bbox="248 568 981 751"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>The current number of options in the BAD may hamper the comparability of financial statements and prudential ratios</td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | The current number of options in the BAD may hamper the comparability of financial statements and prudential ratios | | X | | | | | <p>Voir Annexe 9</p> <p>Les objectifs prudentiels et comptables sont différents, la comparaison entre ces deux référentiels n'est pas pertinente et ne doit pas être recherchée.</p> | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | |
| The current number of options in the BAD may hamper the comparability of financial statements and prudential ratios | | X | | | | | | | | | | | | | | | | | | | | | |
| 35 | <p>Do you agree with the following statements:</p> <table border="1" data-bbox="219 887 981 1340"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Mandatory use of national GAAPs for the preparation of individual financial statements of bank subsidiaries reduces the efficiency of preparing consolidated financial statements</td> <td></td> <td></td> <td>X</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Allowing the use of IFRS for the preparation of individual financial statements by (cross border) banking subsidiaries, subject to consolidated supervision, would increase efficiency</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | Mandatory use of national GAAPs for the preparation of individual financial statements of bank subsidiaries reduces the efficiency of preparing consolidated financial statements | | | X | | | | Allowing the use of IFRS for the preparation of individual financial statements by (cross border) banking subsidiaries, subject to consolidated supervision, would increase efficiency | X | | | | | | <p>Voir Annexe 9</p> <p>Utiliser le même référentiel comptable pour l'élaboration des deux jeux de comptes (comptes annuels et consolidés) est source d'économie et de synergies dans les groupes.</p> <p>Toutefois ces deux jeux de comptes répondent à des besoins différents et sont destinés à des utilisateurs différents : les comptes consolidés sont utilisés par les investisseurs et destinés aux marchés, les comptes annuels servent dans certains pays servir à assoir la base fiscale et sont la base du droit des créanciers et des faillites. Aussi, imposer l'utilisation d'un seul référentiel comptable – les normes IFRS- n'est pas opportun dans la mesure où les filiales seraient toujours tenues d'établir des comptes annuels selon les normes locales pour répondre à leurs obligations juridiques et fiscales.</p> <p>Il est rappelé que cette option est prévue dans le règlement IAS , les états membres peuvent imposer ou permettre l'utilisation des normes IFRS pour l'établissement des comptes annuels des sociétés incluses dans une consolidation établie selon les normes IFRS.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | |
| Mandatory use of national GAAPs for the preparation of individual financial statements of bank subsidiaries reduces the efficiency of preparing consolidated financial statements | | | X | | | | | | | | | | | | | | | | | | | | |
| Allowing the use of IFRS for the preparation of individual financial statements by (cross border) banking subsidiaries, subject to consolidated supervision, would increase efficiency | X | | | | | | | | | | | | | | | | | | | | | | |

36 Do you agree with the following statement:

| | 1 | 2 | 3 | 4 | 5 | 6 |
|---|---|---|---|---|---|---|
| Cross border bank subsidiaries of an EU parent should be allowed not to publish individual financial statements subject to (1)being included in the consolidated financial statements of the group,(2)consolidated supervision and (3)the parent guaranteeing all liabilities and commitments of the cross border subsidiary? | X | | | | | |

1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know

Une proposition qui crée une différence de traitement entre entreprises selon qu'elles sont filiales d'un groupe ou pas.

Cela poserait des différences de traitement entre entreprises. Ainsi, deux entreprises d'un même Etat membre ne seront pas dans la même situation selon leur appartenance ou pas à un groupe, d'autant que l'option serait entre les mains des entreprises, non plus des Etats.

Une proposition dont les conditions restent à préciser

Cette proposition soulève de nombreuses questions.

L'article 37 de la DCU permet aux Etats membres d'exempter les entreprises d'appliquer les dispositions de la directive relatives au contenu, au contrôle et à la publication des états financiers. L'exemption suggérée ne porterait donc pas que sur la publication.

En outre, l'exemption n'est possible aujourd'hui que sous réserve de respecter des conditions très restrictives, qui ne semblent pas être remises en cause.

| Insurance Accounting Directive (IAD) | | | | | | | |
|--------------------------------------|--|---|---|---|---|---|---|
| 37 | Do you agree with the following statements: | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | The Insurance Accounting Directive meets the objective of comparable financial statements within the European insurance industry (the Insurance Accounting Directive is effective) | | | | X | | |
| | The Insurance Accounting Directive is still sufficiently relevant (necessary and appropriate) to meet the objective of comparable financial statements | | | | X | | |
| | The costs associated with the Insurance Accounting Directive are still proportionate to the benefits it has generated (the Insurance Accounting Directive is efficient) | | | | X | | |
| | | 1= totally disagree, 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know | | | | | |
| 38 | Do you agree with the following statements: | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | There are contradicting requirements between the IAD and IFRS 17 which prevent Member States from electing IFRS 17 for statutory and consolidated accounts | | | | | | X |
| | The Insurance Accounting Directive should be harmonized with the Solvency II Framework | | X | | | | |

Voir Annexe 9

Il est nécessaire de conserver au niveau européen un cadre applicable aux comptes des entreprises du secteur de l'assurance. Ce cadre permet d'assurer la comparabilité des comptes entre les établissements situés dans les pays n'ayant pas opté en vertu du règlement IAS pour l'application des normes IFRS pour les sociétés d'assurance. Ce cadre européen permet de tenir compte des spécificités européennes dans le domaine de l'assurance.

Par ailleurs, c'est à partir des comptes sociaux que sont établis les distributions de dividendes, que sont déterminés les droits des créanciers et parfois le résultat taxable, ces éléments confirment le maintien de dispositions comptables spécifiques pour ce secteur au niveau européen.

Toutefois la directive IAD est une directive ancienne et il conviendrait a minima de la mettre à jour sur un plan légistique. Il pourrait être envisagé d'intégrer les dispositions particulières applicables au secteur de l'assurance (lex specialis) dans la directive unique (lex generalis).

Sur le fonds, les dispositions prévues par cette directive sont toujours adaptées notamment pour l'élaboration des comptes annuels des établissements.

Voir Annexe 9

Comme indiqué précédemment, il est souhaitable de maintenir au niveau européen un cadre comptable applicable aux sociétés d'assurance. Ce cadre doit tenir compte des spécificités européennes du secteur de l'assurance et doit se fonder sur la directive comptable unique.

La norme IFRS 17 n'étant pas encore adopté en Europe, la généralisation de son application en Europe n'est pas d'actualité. Par ailleurs, lorsqu'elle sera adoptée en Europe, les Etats membres pourront dans le cadre de l'application du règlement IAS choisir de l'appliquer aux comptes sociaux des entreprises du secteur.

Quant au rapprochement avec Solvabilité 2, il convient de noter qu'il s'agit d'un référentiel prudentiel répondant à des objectifs différents des objectifs de la comptabilité et par ailleurs ce référentiel ne prévoit pas de dispositions quant à l'élaboration d'un compte de

| | | | | | | | | | | | | | | |
|---|---|---|---|--|--|--|--|--|------------------|---|---|---|---|---|
| | <p>The Insurance Accounting Directive should be harmonized with the IFRS 17 Standard</p> | | X | | | | | | <p>résultat.</p> | | | | | |
| | <p>Preparers should be allowed to elect for a European-wide option to apply Solvency II valuation principles in their financial statements</p> | | X | | | | | | | | | | | |
| <p><i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | | | | | | | | | | | | | |
| <p>39</p> | <p>Do you think that the current prudential public disclosure requirements and general public disclosure requirements applicable to insurance and reinsurance undertakings are consistent with each other?</p> | <p>Voir Annexe 9 Les référentiels prudentiels et comptables répondent à des objectifs et des besoins différents aussi il est nécessaire de conserver un cadre européen autonome pour chacun de ces référentiels.</p> | | | | | | | | | | | | |
| | | | | | | | | | 1 | 2 | 3 | 4 | 5 | 6 |
| <p>For European insurance and reinsurance companies under the scope of the mandatory application of IFRS according to the IAS regulation</p> | | | | | | | | | | | | | X | |
| <p>For European insurance and reinsurance companies required to apply IFRS according to Member States options</p> | | | | | | | | | | | | | X | |
| <p>For European insurance and reinsurance companies not required to apply the IFRS Standards</p> | | | | | | | | | | | | | X | |
| <p><i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | | | | | | | | | | | | | |

V. Non-financial reporting framework

| Non-financial reporting Directive | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|--|--|--|---|--|---|---|--|--|--|---|--|---|--|--|--|--|---|--|--|---|
| <p>40 The impact assessment for the NFI Directive identified the quality and quantity of non-financial information disclosed by companies as relevant issues, and pointed at the insufficient diversity of boards leading to insufficient challenging of senior management decisions. Do you think that these issues are still relevant?</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>The quality and quantity of non-financial information disclosed by companies remain relevant issues.</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>The diversity of boards, and boards' willingness and ability to challenge to senior management decisions, remain relevant issues.</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> </tbody> </table> <p><i>1= totally disagree; 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | The quality and quantity of non-financial information disclosed by companies remain relevant issues. | | | | | | X | The diversity of boards, and boards' willingness and ability to challenge to senior management decisions, remain relevant issues. | | | | | | X | <p>Voir Annexe 6</p> <p>La directive n'est applicable pour les sociétés françaises qu'à partir des exercices ouverts après le 1/8/2017. Il est donc difficile pour le moment de se prononcer sur les modalités de sa mise en application. De manière générale, il nous semble plus utile d'envisager une étude d'impact après 3 ans d'application. Les positions données ici reflètent plutôt les attentes de la mise en œuvre de cette directive.</p> <p>Les groupes français éligibles à cette nouvelle directive étaient malgré tout déjà habitués à fournir des informations et indicateurs similaires (à travers la loi Grenelle 2 depuis 2012 et article 173 de la loi de Transition énergétique et de croissance verte sur la prise en compte des risques climatiques depuis 2017) dans le cadre des clôtures annuelles et ne devraient donc pas rencontrer de difficultés particulières dans la mise en œuvre de cette directive.</p> | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | |
| The quality and quantity of non-financial information disclosed by companies remain relevant issues. | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | |
| The diversity of boards, and boards' willingness and ability to challenge to senior management decisions, remain relevant issues. | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | |
| <p>41 Do you think that the NFI Directive's disclosure framework is effective in achieving the following objectives?</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Enhancing companies' performance through better assessment and greater integration of non-financial risks and opportunities into their business strategies and operations</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Enhancing companies' accountability, for example with respect to the social and environmental impact of their operations.</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Enhancing the efficiency of capital markets</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | Enhancing companies' performance through better assessment and greater integration of non-financial risks and opportunities into their business strategies and operations | | | | X | | | Enhancing companies' accountability, for example with respect to the social and environmental impact of their operations. | | | | X | | | Enhancing the efficiency of capital markets | | | | X | | | <p>Voir Annexe 6</p> <p>La directive et ses recommandations doivent permettre de mettre en place un cadre cohérent dans tous les pays de l'Union européenne afin que les pratiques de chaque pays dans ce domaine convergent. En ce sens, l'information non financière doit permettre d'obtenir une information globalement plus pertinente pour les acteurs sur le marché européen.</p> <p>Comme pour la question 40, il est prématuré d'anticiper les impacts potentiels de l'application de la directive.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | |
| Enhancing companies' performance through better assessment and greater integration of non-financial risks and opportunities into their business strategies and operations | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | |
| Enhancing companies' accountability, for example with respect to the social and environmental impact of their operations. | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | |
| Enhancing the efficiency of capital markets | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | |

| | <p>by helping investors to integrate material non-financial information into their investment decisions.</p> <p>Increasing diversity on companies' boards and countering insufficient challenge to senior management decisions</p> <p>Improving the gender balance of company boards</p> | <table border="1"> <tr><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td>X</td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td>X</td><td></td><td></td></tr> </table> | | | | | | | | | | X | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|---|---|---|---|---|---|--|--|--|---|---|--|--|---|--|---|--|---|--|--|----------|--|--|--|---|--|--|--------|--|--|--|---|--|--|------------------------------|--|--|--|---|--|--|----------------------|--|--|--|--|---|--|--|
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p><i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>42</p> | <p>Do you think that the NFI Directive's current disclosure framework is effective in providing non-financial information that is:</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Material</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Balanced</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Accurate</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Timely</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Comparable between companies</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Comparable over time</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table> <p><i>1=totally disagree, 2= mostly disagree; 3= partially disagree and partially agree;4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Material | | | | X | | | Balanced | | | | X | | | Accurate | | | | X | | | Timely | | | | X | | | Comparable between companies | | | | X | | | Comparable over time | | | | | X | | <p>Voir Annexe 6</p> <p>La directive requiert que les entités concernées communiquent sur les informations jugées pertinentes et matérielles en fonction de leur business model, le choix des indicateurs et de leur référentiel est laissé à la discrétion des entreprises.</p> <p>Par conséquent, de par sa construction, c'est la comparabilité de l'information dans le temps qui a été privilégiée par le législateur.</p> <p>Une harmonisation pourrait être envisagée par secteurs d'activité.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Material | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Balanced | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Accurate | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Timely | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Comparable between companies | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Comparable over time | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>43</p> | <p>Do you agree with the following statement:</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>The current EU non-financial reporting framework is sufficiently coherent</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | The current EU non-financial reporting framework is sufficiently coherent | | | | X | | | <p>Une revue des différentes transpositions dans les législations locales est nécessaire pour pouvoir répondre spécifiquement à cette question. Néanmoins, du fait de l'existence de recommandations sur la mise en œuvre de la directive, nous sommes confiants sur le fait qu'à terme les pratiques convergent dans les différents pays de l'Union.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| The current EU non-financial reporting framework is sufficiently coherent | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | (consistent across the different EU and national requirements)? | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|---|---|---|---|---|---|---|--|--|---|---|--|---|---|--|--|--|--|--|--|--|
| 44 | <p>Do you agree with the following statement:</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>The costs of disclosure under the NFI Directive disclosure framework are proportionate to the benefits it generates</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | The costs of disclosure under the NFI Directive disclosure framework are proportionate to the benefits it generates | | | | | | X | <p>Il est impossible à ce stade d'avoir un chiffrage ni des coûts de mises en œuvre (internes et externes) pour les sociétés françaises ni des bénéfices attendus.</p> <p>Comme indiqué à la question 40, le coût marginal de mise en œuvre pour les sociétés françaises devraient être relativement réduit du fait de l'existence de réglementation similaire dans le cadre français.</p> | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | |
| The costs of disclosure under the NFI Directive disclosure framework are proportionate to the benefits it generates | | | | | | X | | | | | | | | | | | | | | | | | |
| 45 | <p>Do you agree with the following statement:</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>The scope of application of the NFI Directive (i.e. limited to large public interest entities) is appropriate</td> <td></td> <td></td> <td>X</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>("Public-interest entities" means listed companies, banks, insurance companies and companies designated by Member States as public-interest entities).</p> | | 1 | 2 | 3 | 4 | 5 | 6 | The scope of application of the NFI Directive (i.e. limited to large public interest entities) is appropriate | | | X | | | | <p>Le critère PIE n'est pas forcément le critère le plus pertinent car certaines sociétés cotées sont de pure holding sans impact RSE matériel. Pour elles, les obligations de la directive sont peu pertinentes.</p> <p>Un critère de taille serait plus adapté (que la société soit cotée ou non) semble-t-il pour le type d'information voulue. Cela permettrait en outre de mettre les différents acteurs d'un même marché sur un pied d'égalité.</p> | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | |
| The scope of application of the NFI Directive (i.e. limited to large public interest entities) is appropriate | | | X | | | | | | | | | | | | | | | | | | | | |
| 46 | <p>Do you agree with the following statement:</p> <p>It has been argued that the NFI Directive could indirectly increase the reporting burden for SMEs, as a result of larger companies requiring additional non-financial information from their suppliers.</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Do you agree that SMEs are required to collect and report substantially more data to larger companies as a result of the NFI directive?</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | Do you agree that SMEs are required to collect and report substantially more data to larger companies as a result of the NFI directive? | | | | X | | | <p>Les plus petites sociétés, non directement soumises à la directive, seront indirectement impactées de fait dès qu'elles ont des marchés avec des sociétés PIE. Nous constatons que celles-ci intègrent les critères RSE dans le processus de sélection de leurs fournisseurs.</p> <p>Ce constat est déjà fait aujourd'hui en application de la réglementation française en cours et ne devrait pas être modifié.</p> | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | |
| Do you agree that SMEs are required to collect and report substantially more data to larger companies as a result of the NFI directive? | | | | X | | | | | | | | | | | | | | | | | | | |

| 47 | <p>Do you agree with the following statement?</p> <table border="1" data-bbox="226 172 996 379"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>The non-binding Guidelines on Non-Financial Reporting issued by the Commission in 2017 help to improve the quality of disclosure</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | The non-binding Guidelines on Non-Financial Reporting issued by the Commission in 2017 help to improve the quality of disclosure | | | | | X | | <p>Les recommandations actuelles constituent une bonne base pédagogique. Celle-ci pourra être enrichie au fil du temps en fonction des pratiques constatées.</p> | | | | | | | | | | | | | | | | | | | | | |
|--|---|-----------------------------|---|---|---|---|---|---|--|--|--|--|---|---|--|--|--|---|--|--|--|--|--------------------------|--|---|--|--|--|--|-----------------------------|--|---|--|--|--|--|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| The non-binding Guidelines on Non-Financial Reporting issued by the Commission in 2017 help to improve the quality of disclosure | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 48 | <p>The Commission action plan on financing sustainable growth includes an action to revise the 2017 Guidelines on Non-Financial Reporting to provide further guidance to companies on the disclosure of climate related information, building on the FSB TCFD recommendations. The action plan also states that the guidelines will be further amended regarding disclosures on other sustainability factors. Which other sustainability factors should be considered for amended guidance as a priority?</p> <table border="1" data-bbox="226 624 996 943"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Environment (in addition to climate change already included in the Action Plan)</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Social and Employee matters</td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Respect for human rights</td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Anti-corruption and bribery</td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | Environment (in addition to climate change already included in the Action Plan) | | | | X | | | Social and Employee matters | | X | | | | | Respect for human rights | | X | | | | | Anti-corruption and bribery | | X | | | | | <p>Voir Annexe 6</p> <p>A ce stade de mise en œuvre, il nous semble pertinent que seuls les impacts sur les indicateurs relatifs au changement climatique comme prévus par les travaux du TCFD puissent être intégrés dans les recommandations. Dans ce cadre, nous avons compris que la création du Lab de l'EFRAG devrait permettre d'identifier les meilleures pratiques en matière de comptabilité environnementale et ainsi proposer un reporting pertinent dans ce domaine.</p> <p>Les autres thèmes sont plus éloignés de cette préoccupation.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Environment (in addition to climate change already included in the Action Plan) | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Social and Employee matters | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Respect for human rights | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Anti-corruption and bribery | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 49 | <p>If you are a preparer company, could you please estimate the increased cost of compliance with national laws on non-financial disclosure that were adopted or amended following the adoption of the NFI Directive in 2014, compared to annual non-financial disclosure costs incurred before the adoption of the NFI Directive?</p> <table border="1" data-bbox="226 1126 996 1299"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>One-off costs of reporting for the first time</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Estimated recurring costs</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | One-off costs of reporting for the first time | | | | | | | Estimated recurring costs | | | | | | | <p>Non applicable</p> | | | | | | | | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| One-off costs of reporting for the first time | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Estimated recurring costs | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 50 | <p>How would you assess, overall, the impact of the NFI Directive disclosure framework on the competitiveness of the reporting EU companies</p> | <p>Voir Annexe 6</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | <p>compared to companies in other countries and regions of the world?</p> <p><input type="radio"/> Very positive impact on competitiveness</p> <p><input type="radio"/> Somewhat positive impact on competitiveness</p> <p><input type="radio"/> No significant impact on competitiveness</p> <p><input checked="" type="radio"/> Somewhat negative impact on competitiveness</p> <p><input type="radio"/> Very negative impact on competitiveness</p> <p><input type="radio"/> Don't know / no opinion / not relevant</p> | <p>Actuellement, seule l'Union européenne dispose d'une législation spécifique sur ce sujet. En conséquence, le « level playing field » avec les pays en dehors de l'Union européenne comme les Etats-Unis ou la Chine où la divulgation de ces éléments se fait que sur base volontaire n'est pas assuré. Pour certains acteurs, diffuser plus d'informations que ses concurrents pourrait les rendre plus vulnérables.</p> <p>Comme pour la question 40, il est prématuré d'anticiper les impacts potentiels de l'application de la Directive.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|---|---|---|---|---|---|--|--|--|--|--|--|---|--|--|--|--|--|--|---|--------------------------------------|--|--|--|--|--|---|---------------------------------------|--|--|--|--|--|---|---|--|--|--|--|--|---|--|
| | <p>Country by country reporting by extractive and logging industries</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>51</p> | <p>Do you think that the public reporting requirements on payments to governments ("country-by-country reporting") by extractive and logging industries are:</p> <table border="1" data-bbox="219 735 999 1230"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Effective (successful in achieving its objectives)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Efficient (costs are proportionate to the benefits it has generated)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Relevant (necessary and appropriate)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Coherent (with other EU requirements)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Designed at the appropriate level (EU level) in order to add the highest value (as compared to actions at Member State level)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> </tbody> </table> <p><i>1= totally disagree, 2= mostly disagree; 3= partially disagree and partially agree; 4= mostly agree; 5= totally agree ; 6= don't know</i></p> | | 1 | 2 | 3 | 4 | 5 | 6 | Effective (successful in achieving its objectives) | | | | | | X | Efficient (costs are proportionate to the benefits it has generated) | | | | | | X | Relevant (necessary and appropriate) | | | | | | X | Coherent (with other EU requirements) | | | | | | X | Designed at the appropriate level (EU level) in order to add the highest value (as compared to actions at Member State level) | | | | | | X | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Effective (successful in achieving its objectives) | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Relevant (necessary and appropriate) | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Coherent (with other EU requirements) | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Designed at the appropriate level (EU level) in order to add the highest value (as compared to actions at Member State level) | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| 52 | <p>As a preparer company, could you please indicate the annual recurring costs (in € and in relation to total operating costs) incurred for the preparation, audit (if any) and publication of the “country-by-country report</p> <table border="1" data-bbox="224 263 996 438"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>One-off costs of reporting for the first time</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Estimated recurring costs</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | One-off costs of reporting for the first time | | | | | | | Estimated recurring costs | | | | | | | |
|---|--|---|---|---|---|---|---|---|---|--|--|--|--|--|--|---------------------------|--|--|--|--|--|--|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | |
| One-off costs of reporting for the first time | | | | | | | | | | | | | | | | | | | | | | | |
| Estimated recurring costs | | | | | | | | | | | | | | | | | | | | | | | |
| 53 | <p>How would you assess, overall, the impact of country-by-country reporting on the competitiveness of the reporting EU companies?</p> <p><input type="radio"/> Very positive impact on competitiveness</p> <p><input type="radio"/> Somewhat positive impact on competitiveness</p> <p><input type="radio"/> No significant impact on competitiveness</p> <p><input checked="" type="radio"/> Somewhat negative impact on competitiveness</p> <p><input type="radio"/> Very negative impact on competitiveness</p> <p><input type="radio"/> Don't know / no opinion / not relevant</p> | <p>Comme pour la question 50, seule l'Union européenne dispose d'une législation spécifique sur ce sujet. En conséquence, le « level playing field » avec les pays en dehors de l'Union européenne comme les Etats-Unis ou la Chine où la divulgation de ces éléments se fait que sur base volontaire n'est pas assuré.</p> | | | | | | | | | | | | | | | | | | | | | |

| Integrated reporting | | | | | | | |
|---|--|--|----------|----------|----------|----------|----------|
| 54 | Do you agree that integrated reporting can deliver the following benefits ? | Voir Annexe 6 | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | More efficient allocation of capital, through improved quality of information to capital providers | | | | | | X |
| | Improved decision-making and better risk management in companies as a result of integrated thinking and better understanding of the value-creation process | | | | X | | |
| | Costs savings for preparers | | X | | | | |
| | Cost savings for users | | X | | | | |
| Other differences (please rate here and specify below) | | | | | | | |
| 55 | Do you agree with the following statement? | Une analyse coûts/bénéfices est préalable à toute décision ; tout en sachant qu'estimer les bénéfices attendus est une tâche peu aisée. | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | A move towards more integrated reporting in the EU should be encouraged | | X | | | | |
| The costs of a more integrated reporting would be proportionate to the benefits it generates (would be efficient) | | | | | X | | |
| 56 | Is the existing EU framework on public reporting by companies an obstacle to allowing companies to move freely towards more integrated reporting? | Voir réponse aux questions 54 et 55 | | | | | |
| | <input type="radio"/> yes <input checked="" type="radio"/> no <input type="radio"/> don't know | | | | | | |

| VI. The digitalisation challenge | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|---|---|---|---|---|---|--|--|--|--|--|---|--|--|--|--|--|--|---|---|--|--|--|--|--|---|---|--|--|--|--|--|---|---|--|--|--|--|--|---|---|
| <p>57</p> <p>Do you consider the existing EU legislation to be an obstacle to the development and free use by companies of digital technologies in the field of public reporting?</p> <p><input checked="" type="radio"/> yes</p> <p><input type="radio"/> no</p> <p><input type="radio"/> don't know</p> | <p>Voir Annexe 8</p> <p>La législation européenne impose un format de transmission électronique structurée des données dans le cadre du projet ESEF. Les sociétés cotées n'ont donc pas le choix de la technologie à utiliser et doivent mettre en œuvre ce format sur la base de la taxonomie IFRS pour le 1 janvier 2020. Pour les sociétés non cotées, le format électronique est laissé aux mains des différents Etats membres.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>58</p> <p>Do you consider that increased digitalisation taking place in the field diminishes the relevance of the EU laws on public reporting by companies (for instance, by making paper based formats or certain provisions contained in the law irrelevant)?</p> | <p>Voir Annexe 8</p> <p>La technologie est considérée comme un support de transmission complémentaire et ne remet pas en cause le besoin de différentes réglementations sur le fond.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>59</p> <p>The impact of electronic structured reporting</p> <p>Do you think that, as regards public reporting by listed companies, the use of electronic structured reporting based on a defined taxonomy (ESEF) and a single access point (EEAP) will meet the following intended objectives:</p> <table border="1" data-bbox="219 695 999 1134"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>improve transparency for investors and the public</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>improve the relevance of company reporting</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>reduce preparation and filing costs for companies</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>reduce costs of access for investors and the public</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>reduce other reporting costs through the re-use of companies' public reporting of electronic structured data for other reporting purposes (eg tax authorities, national statistics, other public authorities)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | improve transparency for investors and the public | | | | | | X | improve the relevance of company reporting | | | | | | X | reduce preparation and filing costs for companies | | | | | | X | reduce costs of access for investors and the public | | | | | | X | reduce other reporting costs through the re-use of companies' public reporting of electronic structured data for other reporting purposes (eg tax authorities, national statistics, other public authorities) | | | | | | X | <p>Voir Annexe 8</p> <p>ESEF ne sera mis en place que pour les exercices ouverts à partir du 1/1/2020 et ne constitue qu'une modification du support de transmission des données. Il est difficile d'anticiper les impacts de cette obligation qui ne modifie en rien les obligations existantes en matière de transparence de l'information.</p> <p>La mise en œuvre prévue se déroule par étape avec dans un premier temps un envoi des données des états primaires seulement.</p> <p>Néanmoins, il s'agit d'une étape complémentaire dans le processus de clôture avec des investissements à prévoir (logiciels spécifiques, experts à embaucher, aide à la mise en œuvre par du consulting). On ne peut donc pas dire que cet outil permettra ni de réduire le délai de clôture, ni de réduire les coûts de préparation des comptes coté préparateurs.</p> <p>Pour les utilisateurs, l'accès à l'information se fera via l'accès à de nouvelles bases de données dont nous ne connaissons pas aujourd'hui les modalités. Il est donc difficile d'anticiper les impacts sur leur manière de travailler.</p> |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| improve transparency for investors and the public | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| improve the relevance of company reporting | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| reduce preparation and filing costs for companies | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| reduce costs of access for investors and the public | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| reduce other reporting costs through the re-use of companies' public reporting of electronic structured data for other reporting purposes (eg tax authorities, national statistics, other public authorities) | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| <p>60</p> | <p>In your opinion, on top of the financial statements, do you think that the following documents prepared by listed companies should contain electronic structured data?</p> <table border="1" data-bbox="219 240 999 946"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td><i>Financial reporting</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Half-yearly interim financial statements</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Management report</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Corporate governance statement</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Other disclosure or statements requirements under the Transparency Directive such as information about major holdings</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td><i>Non-financial reporting and other reports</i></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Non-financial information</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Country-by-country report on payments to governments</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Other documents (please rate here and specify below)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | <i>Financial reporting</i> | | | | | | | Half-yearly interim financial statements | | | | | | X | Management report | | | | | | X | Corporate governance statement | | | | | | X | Other disclosure or statements requirements under the Transparency Directive such as information about major holdings | | | | | | X | <i>Non-financial reporting and other reports</i> | | | | | | | Non-financial information | | | | | | X | Country-by-country report on payments to governments | | | | | | X | Other documents (please rate here and specify below) | | | | | | X | <p>Il est trop tôt pour avoir une opinion pertinente sur cette question. L'application du projet ESEF sur le champ d'application actuel doit d'abord être revue.</p> |
|---|---|--|---|---|---|---|---|---|----------------------------|--|--|--|--|--|--|--|--|--|--|--|--|---|-------------------|--|--|--|--|--|---|--------------------------------|--|--|--|--|--|---|---|--|--|--|--|--|---|--|--|--|--|--|--|--|---------------------------|--|--|--|--|--|---|--|--|--|--|--|--|---|--|--|--|--|--|--|---|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <i>Financial reporting</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Half-yearly interim financial statements | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Management report | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Corporate governance statement | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Other disclosure or statements requirements under the Transparency Directive such as information about major holdings | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <i>Non-financial reporting and other reports</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Non-financial information | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Country-by-country report on payments to governments | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Other documents (please rate here and specify below) | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>61</p> | <p>Once the ESEF is fully developed and in place for listed companies, would this EU language add value as a basis to structure the financial statements, management reports etc. published by any limited liability company in the EU?</p> <p><input type="radio"/> yes</p> <p><input type="radio"/> no</p> <p><input checked="" type="radio"/> don't know</p> | <p>Il est trop tôt pour avoir une opinion pertinente sur cette question. L'application du projet ESEF sur le champ d'application actuel doit d'abord être revue.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| 62 | As regards the non-financial information that listed companies, banks and insurance companies must publish, do you think that digitalisation of this information could bring about the following benefits? | Il est trop tôt pour avoir une opinion pertinente sur cette question. L'application du projet ESEF sur le champ d'application actuel doit d'abord être revue avant de se poser la question d'une extension à l'information non-financière. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|---|---|---|---|---|---|---|---|--|--|--|--|---|--|---|--|--|--|--|---|---|---|--|--|--|--|--|--|
| | <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>Facilitate access to information by users</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Increase the granularity of information disclosed</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Reduce the reporting costs of preparers</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | Facilitate access to information by users | X | | | | | | Increase the granularity of information disclosed | X | | | | | | Reduce the reporting costs of preparers | X | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| Facilitate access to information by users | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Increase the granularity of information disclosed | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Reduce the reporting costs of preparers | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 63 | <p>Digitalisation facilitates the widespread dissemination and circulation of information. Besides, the same corporate reporting information may be available from different sources, such as a company's web site, an OAM, a business register, a data aggregator or other sources. In a digitalised economy, do you consider that electronic reporting should be secured by the reporting company with electronic signatures, electronic seals and/or other trust services?</p> <p><input checked="" type="radio"/> yes</p> <p><input type="radio"/> no</p> <p><input type="radio"/> don't know</p> | L'aspect "sécurité des données" est clé dans toute gestion de base de données afin que leurs utilisations puissent être faites en toute confiance ; charge aux experts informatiques d'identifier la meilleure manière de sécuriser les données en fonction de l'évolution des technologies. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Data storage mechanisms – data repositories | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 64 | <p>Considering the modern technologies at hand to interconnect databases on information filed by listed companies with the OAMs, do you agree with the following statements?</p> <table border="1"> <thead> <tr> <th></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>A pan-EU digital access to databases based on modern technologies would improve investor protection</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>pan-EU digital access to databases based on modern technologies would promote cross border investments and efficient capital</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> </tr> </tbody> </table> | | 1 | 2 | 3 | 4 | 5 | 6 | A pan-EU digital access to databases based on modern technologies would improve investor protection | | | | | | X | pan-EU digital access to databases based on modern technologies would promote cross border investments and efficient capital | | | | | | X | | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| A pan-EU digital access to databases based on modern technologies would improve investor protection | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | |
| pan-EU digital access to databases based on modern technologies would promote cross border investments and efficient capital | | | | | | X | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | | | | |
|----|---|---|---|---|---|---|---|---|
| | markets | | | | | | | |
| | The EU should take advantage of a pan-EU digital access to make information available for free to any user | | | | | | | |
| 65 | Public reporting data in the form of structured electronic data submitted by listed companies could potentially be re-used for different purposes by different authorities. For instance, by filing a report once with an OAMs and re-using it for filing purposes with a business register. In your opinion, should the EU foster the re-use of data and the “file only once” principle? <input type="radio"/> yes <input type="radio"/> no <input checked="" type="radio"/> don't know | | | | | | | |
| 66 | Coherence with other Commission initiatives in the field of digitalization | | | | | | | CF question 39 Comme les référentiels ne sont pas alignés, un alignement de la taxonomie n'aurait pas de sens. |
| | | 1 | 2 | 3 | 4 | 5 | 6 | |
| | Should the EU strive to ensure that labels and concepts contained in public reporting by companies are standardised and aligned with those used for supervisory purposes? | X | | | | | | |