

Verband der Industrie- und Dienstleistungskonzerne in der Schweiz Fédération des groupes industriels et de services en Suisse Federation of Industrial and Service Groups in Switzerland

26 August 2009

International Accounting Standards Board 30 Cannon Street London EC4M 6XH United Kingdom

Exposure Draft on Classification of Rights Issues

Dear Madam, dear Sir

SwissHoldings, the Swiss Federation of Industrial and Services Groups in Switzerland represents 49 Swiss groups, including most of the country's major industrial and commercial enterprises. We very much welcome the opportunity to comment on the above-mentioned Exposure Draft, and our response below has been prepared in conjunction with our member companies.

We agree with all aspects of the proposed IFRS classification of rights issues and subsequent amendment of IAS 32.

We thank you for the opportunity to submit our contribution to your due process.

Yours sincerely,

SwissHoldings

Federation of Industrial and Service Groups in Switzerland

Dr. Gottlieb A. Keller
Current Chair of SwissHoldings,

A. Keller

(General Counsel Roche Holding AG)

Dr. Peter Baumgartner Chair Executive Committee

P. Bannya

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cc SH Board