

MINISTERIO DE ECONOMÍA Y COMPETITIVIDAD

INSTITUTO DE CONTABILIDAD Y AUDITORÍA DE CUENTAS

Comment Letter on the ED/2014/6 *Disclosure Initiative-Proposed amendments to IAS* 7 IFRS Foundation 30 Cannon Street London EC4M 6XH United Kingdom

Dear Madam/Sir,

In the present letter ICAC gives its view on IASB's Exposure Draft ED/2014/6 *Disclosure Initiative – Proposed amendments to IAS 7.*

First of all, ICAC welcomes the IASB's initiative aimed to improve the effectiveness of disclosures in financial statements, in this particular case, in relation to the understanding of the entity cash flows.

ICAC considers that, keeping in mind that IASB is performing further research in a deeper improvement of IAS 7 so the present proposals would have the nature of a first step in the process for meeting the users requests for a better disclosure of the entities cash flows, it would be recommendable to wait until a more comprehensive revision of the IAS 7 will be prepared.

Nevertheless, we consider that the amendments, both the reconciliation of cash flows from financing activities and the disclosures about restrictions on cash and cash equivalents, are positive and favor the information about the liquidity of an entity. So, if the proposed amendments were finally approved, we would not disagree with their contents. We agree with the IASB's proposed requirements to apply the amendments prospectively.

Finally, regarding the IFRS Taxonomy, ICAC does not issue an opinion since taxonomy is not strictly part of the accounting standardisation.

Please don't hesitate to contact us if you would like to clarify any point of this letter.

Yours sincerely,

Ana M^a Martínez-Pina Chairman of ICAC Madrid, 15th April 2015