

Manager  
Corporations and Schemes Unit  
Financial System and Services Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

15 December 2014

Dear Sir/Madam

**CORPORATIONS AMENDMENT (REMUNERATION DISCLOSURES) REGULATION 2014**

BDO welcomes the opportunity to provide a submission on the exposure draft (Exposure Draft) of the *Corporations Amendment (Remuneration Disclosures) Regulation 2014*.

We are pleased to note that the majority of our concerns raised in our comment letter of 7 April 2014 on *Corporations and Related Legislation Amendments Regulation 2013 (No. 1)* have been addressed in this exposure draft. However, we still have a number of concerns which we have summarised below.

**Item 1 - Amendment to item 14**

Item 1 proposes to omit 'issuing entity' and to substitute it with 'disclosing entity' in Item 14. This will result in details of modifications to share-based payment transactions only being disclosed for the disclosing entity itself, rather than for the disclosing entity or any of its subsidiaries. As the exposure draft is proposing to consistently require disclosure about options, rights and other equity instruments of the disclosing entity or any of its subsidiaries in items 15 to 22, it is our view that 'issuing entity' should be substituted with 'disclosing entity or any of its subsidiaries.'

**Item 4 - Amendment to subparagraph 2M.3.03(b)(i)**

Item 4 proposes to omit 'issuing entity' and to substitute it with 'disclosing entity', meaning that only the name and details of the disclosing entity will need to be disclosed for disclosure items 15 - 19 (options and rights granted as compensation and exercised during the period, as well as reconciliations of options, rights and other equity instruments), rather than separately for the disclosing entity or any of its subsidiaries. As the exposure draft is proposing to consistently require disclosure about options, rights and other equity instruments of the disclosing entity or any of its subsidiaries in items 22 to 24, it is our view that 'issuing entity' should be substituted with 'disclosing entity or any of its subsidiaries' in Regulation 2M.3.03(b)(i).

If you have any comments regarding our submission, please do not hesitate to contact Sheryl Levine at sheryl.levine@bdo.com.au.

Yours sincerely

**BDO Australia Limited**



Timothy Kendall

National Audit Leader