



Accounting Technical Services  
Hot Topic

FRC's Annual Review of Corporate Reporting 2020/21  
– Key Highlights Checklist

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# FRC's Annual Review of Corporate Reporting 2020/21 – Key Highlights

## Introduction and overview of the FRC's key findings

### Introduction

This Hot Topic sets out the key highlights identified by the Financial Reporting Council (FRC) in their [Annual Review of Corporate Reporting for 2021/22](#) by providing a checklist of the common areas where companies tend to be non-compliant, poor on quality, or omit from their annual reports.

The checklist therefore sets out the common areas that companies should ensure they include and improve within their annual reports, as well as those that they should look to avoid within their reporting.

### Quality of corporate reporting

The table opposite sets out the top ten topic areas that arose most frequently when the FRC conducted its reviews of the 246 annual reports for 2020/21 (2019/20: 216), along with the corresponding place for each topic area within the top ten for the previous two years.

The FRC's key findings were:

1. The **overall quality of reporting by UK companies** did not decline in quality, despite the challenges of reporting in the continuing Covid-19 pandemic.
2. There were incremental improvements in the quality of information reported in the **strategic reports and better linkage to the financial statements**, specifically there were fewer instances of challenge with the requirement to produce a report that is fair and balanced, or where the principal risks were omitted. The enhancements adopted by many companies was therefore welcomed.
3. Disclosure of **significant judgements and estimation uncertainties** also continued to improve, however the topic still remains as the number one area of where questions and queries were raised.
4. Companies should aim to meet the **overall disclosure objectives** of financial reporting, being “to provide financial information that is useful to a wide range of users in making economic decisions”, as well as seeking to meet the detailed reporting requirements of specific IFRSs.
5. There was continued concern regarding the number of queries raised in relation to compliance with the **requirements of IAS 7 Statement of Cash Flows**. Companies should therefore increase their focus on cash flow statements as part of their pre-issuance reviews.

Topic	2020/21	2019/20	2018/19
Judgements and estimates	1	1	1
Revenue	2	3	10
Statement of cash flows	3	7=	5
Impairment of assets	4	2	4
APMs	5	5	3
Financial instruments	6	4	8=
Strategic report and the Companies Act	7	6	2
Provisions and contingencies	8	7=	7
Leases	9	-	-
Income taxes	10	-	-
Fair value measurement	-	9=	8=
Business combinations	-	9=	-

### Priorities for 2021/22

The FRC has stated that its focus for the forthcoming 2021/22 cycle will be on:

- i. climate-related risks and new disclosures; and
- ii. judgement and uncertainty in the face of the continuing economic and social impact of Covid-19.

Companies should ensure that the impact of these matters on their business is appropriately reflected in the financial statements and wider annual report.

# FRC's Annual Review of Corporate Reporting 2020/21 – Key Highlights

## Checklist of key points raised by the FRC

Topic	What to provide:		What to avoid:
1. Judgements and estimates	Critical judgements	<ul style="list-style-type: none"> <li>Disclosures should be clear, explaining the reasons why the judgements were necessary, the factors that had been considered and the outcomes reached.</li> <li>Ensure the judgements and related disclosures are consistent with other parts of the annual report, such as those indicated in the audit committee report, audit report, viability statement and going concern disclosures.</li> </ul>	<ul style="list-style-type: none"> <li><b>Repetition of the standards:</b> Simply just repeating the requirements of the accounting standard when explaining the judgement that has been made.</li> <li><b>Limited information:</b> <i>Only</i> giving a cross-reference to the relevant note to the financial statements (unless all the required information about the judgment or estimate is provided in the note).</li> </ul>
	Sources of estimation uncertainty	<ul style="list-style-type: none"> <li>Ensure the carrying amounts of the assets and liabilities subject to estimation uncertainty are identified.</li> <li>Disclosures should be quantified through sensitivity analyses or ranges of outcomes.</li> <li>Values should be assigned to key inputs and assumptions.</li> <li>Where cross-references to notes are given, ensure the required information is provided in the note.</li> </ul> <div data-bbox="622 715 1637 954" style="border: 2px solid teal; padding: 5px;"> <p><b>FRC area of encouragement:</b> To provide additional disclosures where the directors believe it is relevant to users. Entities are therefore encouraged to make a clear distinction between disclosures required under IAS 1.125, where there is significant risk of a material adjustment in the following year, and disclosures of other uncertainties, for example where the risk of a material adjustment is not significant or arises over a longer period. This helps users to focus on the most important areas of estimation uncertainty.</p> </div>	

# FRC's Annual Review of Corporate Reporting 2020/21 – Key Highlights

## Checklist of key points raised by the FRC

Topic	What to provide:		What to avoid:
2. Revenue	<b>Overarching disclosure objective</b>	<ul style="list-style-type: none"> <li>Disclosures should focus on the overarching disclosure objective of IFRS 15, as well as the specific disclosure requirements, being to “disclose sufficient information to enable users to understand the nature, amount, timing and uncertainty of revenue and cash flows.”</li> </ul>	<ul style="list-style-type: none"> <li><b>Insufficient explanations:</b> Where there have been significant and/or unusual transactions, sufficient information should be provided to explain the effect on the financial statements. Common unexplained areas include:                             <ul style="list-style-type: none"> <li>Contract modifications;</li> <li>Contract balances; and</li> <li>Acting as a principal vs agent, particularly the judgements made to conclude.</li> </ul> </li> </ul>
	<b>Timing of revenue recognition and recognition at a point in time</b>	<ul style="list-style-type: none"> <li>Fuller explanations should be provided to explain the timing of revenue recognition, including whether revenue is recognised at a point in time, or over time. Where it is a point in time, stating exactly when the revenue is recognised for the performance obligations e.g. explaining why dispatch of goods coincides with the transfer of control.</li> </ul>	
	<b>Revenue recognised over time</b>	<ul style="list-style-type: none"> <li>Disclosures should clearly explain the methods used to measure the extent to which performance obligations are satisfied over time, explaining a description of the methods used, how they have been applied in practice and why the methods provided a faithful depiction of the transfer of goods or services.</li> </ul>	
	<b>Judgements</b>	<ul style="list-style-type: none"> <li>Applying the requirements of IFRS 15 often requires entities to apply judgements. Judgements must be disclosed under IFRS 15.123 in relation to:                             <ul style="list-style-type: none"> <li>the timing of satisfaction of performance obligations; and</li> <li>the transaction price and the amounts allocated to performance obligations.</li> </ul> </li> <li>Additionally, disclosures relating to judgements that have had the most significant effect on the amounts recognised in the financial statements should be provided under IAS 1.122.</li> </ul>	
	<b>Variable consideration</b>	<ul style="list-style-type: none"> <li>Accounting policies should clearly describe the types of any variable consideration receivable, the methods used to estimate the variable consideration (either the expected value or most likely amount approach), and how the variable consideration constraint has been applied to the estimated amount.</li> </ul>	

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## Checklist of key points raised by the FRC

Topic	What to provide:		What to avoid:
<b>3. Statements of cash flows</b>  <i>The cash flow statement was the main source of restatements due to non-compliance.</i>	<b>Indirect method</b>	<ul style="list-style-type: none"> <li>• Ensure the net operating cash flows reconciliation starts by adjusting profit or loss as reported under IFRS (such as profit before income tax), rather than an APM.</li> <li>• Ensure that the net cash flows from operating activities are adjusted only for the effects of: changes during the period in inventories, operating receivables and operating payables; non-cash items; and all other items for which the cash effects are investing or financing cash flows.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Presenting non-cash items:</b> Ensure non-cash amounts are excluded from the cash flows e.g. assets purchased under lease arrangements.</li> <li>• <b>Discrepancies:</b> Ensure there are no discrepancies between the amounts in the cash flow statement and the amounts reported elsewhere in the annual report and accounts.</li> </ul>
	<b>Classification of cash flows</b>	<ul style="list-style-type: none"> <li>• Ensure cash flows are classified appropriately:                             <ul style="list-style-type: none"> <li>• dividends received from associates and joint ventures - classified as investing activities;</li> <li>• interest payments on lease liabilities presented separately from the lease payments, and classified as either operating or financing activities depending upon the accounting policy;</li> <li>• net cash paid on acquisitions - classified as investing activities;</li> <li>• acquisition-related costs - classified as operating activities;</li> <li>• cash flows from acquisitions of non-controlling interests - classified as financing activities;</li> <li>• cash flows from derivatives - classified as operating activities where relating to an economic hedge, or where relating to a designated hedge then classified in the same manner as the cash flows of the position being hedged; and</li> <li>• amounts borrowed from, and lent to, subsidiaries (within parent entity financial statements) - classified as investing and financing respectively.</li> </ul> </li> </ul>	
	<b>Reporting cash flows from investing and financing activities on a gross basis</b>	<ul style="list-style-type: none"> <li>• Major classes of gross cash receipts and gross cash payments must be reported separately (i.e. no netting of cash flows), for instance new borrowings from repayments, and lease incentives from lease repayments, unless the specific requirements of reporting on a net basis under IAS 7.22 are met. Cash flows may be reported on a net basis when: (a) cash receipts and payments are for items in which the turnover is quick, the amounts are large and the maturities are short; and (b) cash receipts and payments are on behalf of customers when the cash flows reflect the activities of the customer rather than the entity.</li> </ul>	
	<b>Changes in liabilities arising from financing activities</b>	<ul style="list-style-type: none"> <li>• Disclosures must include the reconciliation of cash flow changes in liabilities arising from financing activities.</li> <li>• The reconciliation must: only include cashflows relating to financing activities, for instance it should exclude derivative cash flows classified as investing activities; include lease cash flows; include a sub-total for cash flows from financing activities, where the reconciliation includes other items such as cash and cash equivalents; and agree back to the amounts reported in the cash flow statement.</li> </ul>	

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## Checklist of key points raised by the FRC

Topic	What to provide:	What to avoid:	
<b>4. Impairment of assets</b>  <i>Entities are expected to focus on impairment in the light of the economic effects of Covid-19</i>	<b>Cash generating units (CGUs)</b>	<ul style="list-style-type: none"> <li>• <b>Boilerplate terminology:</b> Avoid the use of boilerplate information, such as about the basis/nature of CGUs and the basis for carrying out value in use testing (based on the requirements of the standard).</li> </ul>	
	<b>Impairment testing method</b>		<ul style="list-style-type: none"> <li>• Disclosures should give specific information about:                             <ul style="list-style-type: none"> <li>• the basis on which CGUs are identified; and</li> <li>• any changes year-on-year, such as the reason for changing the basis of the CGUs and methodology applied.</li> </ul> </li> <li>• For goodwill impairment testing, the highest level for which testing can be performed is at the operating segment level.</li> </ul>
	<b>Discount rate</b>		<ul style="list-style-type: none"> <li>• Value in use calculations should include only cash flow estimates for the asset in its current condition, rather than cash flows from enhancing the asset's performance. Disclosures should support this and explain clearly the assumptions applied.</li> </ul>
	<b>Impairment losses</b>		<ul style="list-style-type: none"> <li>• Explanations should be provided about how discount rates have been derived, and where there has been a significant change, reasons should be given.</li> </ul>
	<b>Sensitivity analysis</b>		<ul style="list-style-type: none"> <li>• Disclosures should give information about the losses recognised in the year, for instance the recoverable amount of the impaired asset and the events and circumstances that led to the impairment.</li> </ul>
	<b>Impact of climate change</b>		<ul style="list-style-type: none"> <li>• Sensitivity analysis should be performed to explain whether reasonably possible changes in key assumptions could result in an impairment loss.</li> <li>• Values should be assigned to key assumptions.</li> <li>• Better disclosure should help users to understand how assumptions and sensitivities correspond to scenarios discussed in the front-end reporting.</li> <li>• Where a reasonably possible change in a key assumption would lead to an impairment loss, disclosures should be provided to state the value of the assumption, headroom and amount by which that assumption would need to change to drive an impairment.</li> </ul> <div style="border: 2px solid teal; padding: 5px; margin-top: 10px;"> <p><b>FRC area of focus:</b> Entities must consider the impact of climate change on their impairment reviews, especially in those industries where investors may reasonably expect climate change to significantly affect future expected cash flows for particular assets or cash generating units. Disclosures should ensure that this is addressed in the description of management's approach to determining the risk of impairment and any key assumptions.</p> </div>

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Topic	What to provide:		What to avoid:
<b>5. Alternative Performance Measures (APMs)</b>	<b>Labels</b>	<ul style="list-style-type: none"> <li>Labels should be consistent with their content and basis of calculation, and avoid being overly optimistic or positive. Labels, titles or descriptions should not be the same or confusingly similar to GAAP measures.</li> </ul>	<ul style="list-style-type: none"> <li><b>Undue prominence:</b> Giving undue prominence to APMs, for instance by only giving meaningful commentary on non-GAAP measures, by presenting more APMs than IFRS measures, or by focussing discussions in key statements on APMs rather than IFRS measures. For instance, avoid comments that indicate APMs have more authority than their GAAP equivalents (e.g. comments that only highlight the limitations of GAAP measures or comments that imply that APMs are superior to their GAAP equivalents).</li> </ul>
	<b>Definitions and explanations</b>	<ul style="list-style-type: none"> <li>Definitions should be provided for all APMs.</li> <li>Tailored explanations should be provided that articulate why each APM provides useful information about financial performance, position or cashflows.</li> <li>Explanations should provide whether each APM is used internally, by whom and for what purpose.</li> <li>Specific disclosures should be given to explain what is meant by terms such as 'underlying profit', 'non-underlying items' or 'core-operations'.</li> </ul>	
	<b>Reconciliations and calculations</b>	<ul style="list-style-type: none"> <li>Reconciliations should be given for all APMs, including ratios, with clear explanations of how reconciling items relate to the amounts in the financial statements.</li> <li>The APMs should be able to be recalculated using the information in the financial statements.</li> <li>Adjustments made in calculating APMs from IFRS numbers should include gains, as well as losses, when relevant to the definition of the APMs.</li> </ul>	
	<b>Consistency and non-recurring items</b>	<ul style="list-style-type: none"> <li>Disclosures should explain why costs are considered to be non-recurring, in particular for restructuring costs that recur over a number of years.</li> <li>For multi-year programmes, the disclosures should reference each year affected and provide the costs to-date, total expected costs and timeframes.</li> </ul>	
	<b>ESMA Guidelines</b>	<p><b>FRC expectation:</b> UK entities should continue to apply the <a href="#">ESMA Guidelines on Alternative Performance Measures</a>. The guidelines are consistent with the Companies Act 2006 and codify best practice.</p>	

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Topic	What to provide:	What to avoid:	
<b>6. Financial Instruments</b>	<b>Overarching disclosure objective*</b>	<ul style="list-style-type: none"> <li>• <b>Insufficient explanations:</b> Where there have been significant and/or one-off transactions, sufficient information should be provided to explain the effect on the financial statements. Common unexplained areas include:                             <ul style="list-style-type: none"> <li>• Modification of debt; and</li> <li>• Impact on hedge accounting and the associated assessment of whether a forecast transaction is highly probable or not.</li> </ul> </li> </ul>	
	<b>Other financial assets*</b>		<ul style="list-style-type: none"> <li>• Disclosures should be provided about the recoverability of all financial assets, for instance not just trade receivables but parent company receivables from subsidiaries and 'other' financial assets, along with the methodology used to assess recoverability.</li> </ul>
	<b>Estimation of ELC provisions and credit risk*</b>		<ul style="list-style-type: none"> <li>• Disclosures should quantify weightings applied to forward-looking economic scenarios and quantify key variables.</li> <li>• Explanations should be given about the factors considered when determining whether there had been a significant increase in credit risk (i.e. quantitative and qualitative thresholds triggering a transfer from stage 1 to stage 2).</li> <li>• For compliance, disclosures must include:                             <ul style="list-style-type: none"> <li>• the inputs, assumptions and estimation techniques used to apply the IFRS 9 impairment requirements;</li> <li>• the gross carrying amounts of financial assets by credit risk rating grades;</li> <li>• information about the credit risk management practices, including definitions of default and the reasons for selecting specific definitions; and</li> <li>• information about the concentration of credit risk.</li> </ul> </li> </ul>
	<b>Offsetting of bank overdrafts</b>		<ul style="list-style-type: none"> <li>• Ensure the offsetting of bank overdrafts against cash and cash equivalents meet the requirements under IAS 32.42b, which require offset only when the entity currently has a legally enforceable right to set off the recognised amounts, and intends either to settle on a net basis, or to realise the asset and settle the liability simultaneously. These offset requirements are different to the netting requirements under IAS 7 for presentation within the cash flow statement.</li> </ul>
	<b>Factoring and reverse factoring arrangements</b>		<ul style="list-style-type: none"> <li>• Disclosures should be provided about such arrangements, including:                             <ul style="list-style-type: none"> <li>• the nature of the arrangements;</li> <li>• the effect on the balance sheet and cash flows;</li> <li>• the accounting policies applied; and</li> <li>• the effect on covenants.</li> </ul> </li> </ul>
	<p>* The FRC's Annual Review of Corporate Reporting provides an illustrative example of better disclosure to explain some of the issues raised. It does not represent any particular company's reporting. This illustrative example is replicated in this Hot Topic on page 13.</p>		



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Topic	What to provide:		What to avoid:
<b>7. Strategic report and the Companies Act</b>	<b>Fair, balanced and comprehensive</b>	<ul style="list-style-type: none"> <li>• Ensure significant matters discussed elsewhere in the annual report or financial statements are addressed in the strategic report.</li> <li>• Consider the performance <i>and</i> position of the business by including information about the balance sheet and cash flows, rather than solely the results for the period.</li> <li>• Give a balanced view that discusses both positive and negative matters, for instance a financial review that discusses an adjusted profit should also discuss the IFRS loss;</li> <li>• Compare year-on-year performance using a like-for-like basis, for example by stripping out the impact on a new standard adopted in the year.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Omitting risks:</b> Omitting risks that appear to merit inclusion, for instance climate change, the impact of EU exit by the UK, the impact of Covid-19 and cyber security risk.</li> </ul>
	<b>Contents of the strategic report</b>	<ul style="list-style-type: none"> <li>• Ensure the strategic report contains the five main content-related objectives:               <ul style="list-style-type: none"> <li>• insight into the entity's business model and its main strategy and objectives;</li> <li>• the principal risks the entity faces and how they might affect its future prospects;</li> <li>• relevant non-financial information;</li> <li>• an analysis of the entity's past performance; and</li> <li>• information to enable shareholders to assess how directors have had regard to stakeholders and other matters when performing their duty under section 172.</li> </ul> </li> </ul>	
	<b>Impact of climate change</b>	<ul style="list-style-type: none"> <li>• Ensure the non-financial reporting disclosures address climate change 'to the extent necessary for an understanding of the entity's development, performance and position and the impact of its activity' [CA2006 414CB(1)(a)]. Disclosures should:               <ul style="list-style-type: none"> <li>• provide a description of significant climate-related policies pursued rather than simply naming them, or explain the reason if no such policies are pursued;</li> <li>• provide clear explanations to understand and compare major commitments such as 'net zero emissions' targets or 'Paris aligned' strategies, linking into the financial statements where applicable.</li> <li>• describe performance against climate-related targets, with any changes from the previous year explained;</li> <li>• describe the impact of the entity's business on the environment, as well as the risks that climate change gives rise to for the entity, including those from within the entity's supply chain and from use of products.</li> </ul> </li> <li>• Describe the principal climate-related risks and uncertainties, and any significant impacts on the business model. Be specific to the entity's circumstances, and clear on the magnitude of the risk. Consider explaining the rationale if it is concluded that climate change does not give rise to any significant risks for the entity.</li> </ul>	

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Topic	What to provide:		What to avoid:
8. Provisions and contingencies	Consistency	<ul style="list-style-type: none"> <li>Ensure that information disclosed elsewhere in the annual report is consistent with that provided within the financial statements, for instance that contingent liabilities are disclosed or provisions are recognised.</li> </ul>	<ul style="list-style-type: none"> <li><b>Netting provisions covered by insurance:</b> Netting of provisions that are covered by insurance; the claim and related reimbursement asset must be recognised on a gross basis.</li> </ul>
	Recognition and measurement	<ul style="list-style-type: none"> <li>Sufficient information should be provided about the basis for recognition i.e. explaining the obligating event that has given rise to the provision.</li> <li>Ensure clear explanations are provided where there are changes in accounting policies, significant increases or releases of provisions.</li> </ul>	
	Judgements	<ul style="list-style-type: none"> <li>Significant judgements should include those taken to recognise provisions, as well as <i>not</i> to recognise provisions, for instance a decision taken not to recognise an onerous lease provision.</li> </ul>	
	Disclosures	<ul style="list-style-type: none"> <li>Sufficient information should be provided to explain the nature of provisions, related uncertainties and the potential timing of cash outflows.</li> </ul>	
	Seriously prejudicial exemption	<ul style="list-style-type: none"> <li>Where full disclosure about a provision is not provided, information is <i>still</i> required to be disclosed about the general nature of the dispute and the reason why the information has not been disclosed due to the information being seriously prejudicial.</li> </ul>	

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Topic	What to provide:		What to avoid:
9. Leases	<b>Overarching disclosure objective</b>	<ul style="list-style-type: none"> <li>Disclosures should focus on the overarching disclosure objective of IFRS 16, as well as the specific disclosure requirements, being to “<i>disclose information in the notes that, together with the information provided in the statement of financial position, statement of profit or loss and statement of cash flows, gives a basis for users to assess the effect of leases on the financial position, financial performance and cash flows.</i>”</li> </ul>	<ul style="list-style-type: none"> <li><b>Inconsistencies:</b> Ensure there are no inconsistencies between the information provided in the leases note and that provided elsewhere in the reporting.</li> </ul>
	<b>Accounting policies</b>	<ul style="list-style-type: none"> <li>Ensure material accounting policies are included and are clear, for instance in relation to sale and leaseback transactions, lease incentives, items outside the scope of IFRS 16 and non-lease components.</li> </ul>	
	<b>Disclosure omissions</b>	<ul style="list-style-type: none"> <li>For compliance, disclosures for lessees must include:                             <ul style="list-style-type: none"> <li>the total annual cash flows relating to leases [IFRS 16.53g];</li> <li>any material commitments [IFRS 16.59b(iv)]; and</li> <li>the qualitative disclosures about the potential future cash outflows not recognised, where a significant judgement has been identified, for instance in relation to termination or extension options [IFRS 16.59].</li> </ul> </li> </ul>	
	<b>Maturity analysis</b>	<ul style="list-style-type: none"> <li>Ensure that the disaggregation of the maturity analysis of the lease liabilities is sufficient, for instance years 1 to 5 were often treated as a single time band.</li> </ul>	
	<b>Significant variable lease payments</b>	<ul style="list-style-type: none"> <li>Disclosures should explain the nature and the potential accounting effect of leases that contain significant variable payment features, such as features linked to sale or inflation.</li> </ul>	

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Topic	What to provide:	What to avoid:	
<b>8. Income taxes</b>	<b>Recoverability of deferred tax assets*</b>	<ul style="list-style-type: none"> <li>• <b>Unexplained reconciling items:</b> Ensure that explanations are disclosed for significant reconciling items affecting the relationship between income tax expense and the accounting profit multiplied by the tax rate, for instance providing clear line item headings or additional information if necessary.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Disclosures should be clear and specific regarding the nature of evidence supporting recognition of deferred tax assets by loss-making entities, where the utilisation of those assets depends on future profits. For instance, disclosing:                             <ul style="list-style-type: none"> <li>• the amount of recognised DTAs;</li> <li>• the nature of evidence considered;</li> <li>• critical judgements used in the recognition of DTAs (e.g. how the probability of recoverability of deferred tax assets was determined); and</li> <li>• the key sources of estimation uncertainty, including the carrying amounts affected and an explanation of the effect of any significant changes in key assumptions on the recovery of DTAs.</li> </ul> </li> </ul>		
	<b>Unused tax losses*</b>		<ul style="list-style-type: none"> <li>• For compliance, disclosures must include:                             <ul style="list-style-type: none"> <li>• the amount (and expiry date, if any) of deductible temporary differences, unused tax losses or unused tax credits for which no deferred tax asset is recognised; and</li> <li>• for each type of temporary difference and unused tax losses: the amount of deferred tax assets recognised and related movements in profit or loss.</li> </ul> </li> </ul>
	<b>Deferred tax arising on business combinations</b>		<ul style="list-style-type: none"> <li>• Be clear on the recognition of deferred tax associated with adjustments to recognise acquired assets as part of a business combination.</li> </ul>
	<b>Offsetting</b>		<ul style="list-style-type: none"> <li>• Be clear on the basis for offsetting deferred tax assets and liabilities relating to different classes of temporary differences.</li> </ul>
	<b>Uncertain tax positions</b>		<ul style="list-style-type: none"> <li>• Explain clearly the significant judgements or estimation uncertainties in relation to uncertain tax positions.</li> </ul>
<b>Judgements and estimates*</b>	<div style="border: 2px solid teal; padding: 5px;"> <p><b>FRC expectation:</b> To provide sufficiently specific explanations of the judgements and estimates made, recognised amounts at risk and potential additional exposure to tax of the significant judgements and key sources of estimation made.</p> </div>		
<p>* The FRC's Annual Review of Corporate Reporting provides an illustrative example of better disclosure to explain some of the issues. It does not represent any particular company's reporting. This illustrative example is replicated in this Hot Topic on page 14.</p>			

# FRC's Annual Review of Corporate Reporting 2020/21 – Key Highlights

## Illustrative example – Financial instruments

### Case Study<sup>8</sup>

#### Impairment of financial assets

The Group measures the loss allowance at an amount equal to lifetime expected credit losses for all trade receivables.

The disclosures explain that the simplification available under paragraph 5.5.15 of IFRS 9 has been applied to all trade receivables.

#### Intercompany receivables

Included in loans to subsidiary undertakings is an £85 million unsecured subordinated loan to TradeCo Limited. The loan was advanced on 27 September 2012, at a fixed rate of 9.5%, with a repayment date of 27 September 2032.

TradeCo Limited has cash and cash equivalents of £614.7 million and borrowings of £240.0 million. Based on its liquidity and expected cash generation, there has been no significant increase in credit risk and the expected 12 months credit loss for TradeCo Limited trade and other receivables is not considered to be significant. As a result, no impairment has been recorded for amounts owed by Group companies on the grounds of materiality.

Disclosure explains how ECLs have been assessed for intercompany receivables.

#### Receivables excluding trade receivables

The Group's credit risk is primarily attributable to its trade receivables and the risk of customer default. Credit risk also arises on accrued income, which primarily arises where services have been provided but the amount has yet to be invoiced on to the client. The accrued income balance is short term in nature, with an average ageing of 21 days, and relates to clients with a strong credit history. Therefore, the expected credit losses on receivables, other than trade receivables, were negligible.

The company confirmed that it considered impairment of receivables other than trade receivables, and provided specific detail in respect of the accrued income balance.

#### Concentrations of credit risk

The Group has no significant concentrations of credit risk. The trade receivables balance is spread across a large number of different customers with no single debtor representing more than 5% of the total balance due (last year: 6%).

The company provided a helpful indication that there is no significant concentration of credit risk to individual customers.

However, the Group's debtors include counterparties in sectors that have increased exposure to Government-imposed Covid-19 lockdown restrictions, which may increase the risk of non-payment. The proportions of the trade receivables balance relating to these sectors are: Retail 12%, Leisure 5%, and Office Space 18%.

The company highlights its credit exposure to certain sectors which may result in increased credit risk as a result of the economic impact of Covid-19.

<sup>8</sup> The case study provides an example of better disclosure, annotated to explain what makes it better. It has been developed from our observations during the year, but does not represent any particular company's reporting.

# FRC's Annual Review of Corporate Reporting 2020/21 – Key Highlights

## Illustrative example – Income taxes

### Case Study<sup>18</sup>

Deferred tax assets of £30m (2020: £28m) include £20m (2020: £26m) relating to the carry forward of unused tax losses. These arose predominantly in Subsidiary A, domiciled in country A (£10m), and Subsidiary B, domiciled in country B (£8m), which have a recent history of losses for tax purposes. However, due to the reasons set out below, the directors consider it probable that sufficient taxable profit will be available against which the unused tax losses can be utilised. Management expects these deferred tax assets to be utilised over a period of between five and seven years.

In the prior period, Subsidiary A reported a one-off loss due to the recognition of a provision for legal claims arising from a breach of health and safety regulations at Factory A. Management does not consider this event will affect the sustainability of future taxable profits in the jurisdiction.

The losses recorded by Subsidiary B in the current and previous period were due solely to losses suffered by division P as sales of product X diminished. Following the strategic decision to cease manufacture of product X, management is confident that this division will return to profitability on the basis of the historical profitability of the ongoing activities and previous forecasting accuracy.

In evaluating whether it is probable that taxable profits will be earned in future accounting periods, management derived their forecasts from the approved three-year budget and the forecasts used for the purposes of reviewing goodwill for impairment, updated for the effect of applicable tax laws and regulations relevant to those future taxable profits. No reasonably possible change in any of the key assumptions would result in a significant reduction in projected tax profits such that the recognised deferred tax asset would not be realised.

At the balance sheet date, the group had total tax losses arising in countries C and D of £21m (2020: £18m) for which no deferred tax asset is recognised because of the unpredictability of future taxable profits. These tax losses can be carried forward indefinitely.

Amount of deferred tax assets disclosed in respect of subsidiaries with a recent history of losses.

Periods over which deferred tax assets are expected to be utilised.

Explanation of the evidence supporting recognition of the deferred tax assets, despite the companies reporting a recent history of losses.

The company considers that there are no significant sources of estimation uncertainty.

<sup>18</sup> The case study provides an example of better disclosure, annotated to explain what makes it better. It has been developed from our observations during the year, but does not represent any particular company's reporting.

# Contact

Mazars has a specialist Accounting Technical Services team dedicated to providing support on accounting and corporate reporting matters.

This technical publication aims to provide you with a high-level briefing of the changes and developments impacting accounting and corporate reporting. For more detailed information and a comprehensive understanding of how these issues impact your business, please contact:

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