

Allens

Deutsche Bank Place
Corner Hunter & Phillip Streets
Sydney NSW 2000 Australia
T +61 2 9230 4000
F +61 2 9230 5333
www.allens.com.au

GPO Box 50
Sydney NSW 2001 Australia
DX 105 Sydney

ABN 47 702 595 758

Allens > < Linklaters

9 May 2013

Manager
Corporate Governance and Reporting Unit
Corporations and Capital Markets Division
The Treasury
Langton Crescent
Parkes ACT 2600

Dear Sir/ Madam

**Submissions on Corporations Legislation Amendment
Regulation 2013**

We make the following submissions in respect of Schedule 4 of the draft of the Corporations Legislation Amendment Regulation 2013 (No. A) (**Schedule 4**).

1. General

Based on the Explanatory Statement published with the Corporations Legislation Amendment Regulation 2013 (No. A), we understand that the regulations in Schedule 4 are proposed in order to replace AUS 29, which is to be deleted from Accounting Standard AASB 124 *Related Party Disclosures* (**AASB 124**). Our submissions focus on language contained in Schedule 4 that is inconsistent with Aus 29. There is no intention, as we understand it, for Schedule 4 to deviate in any way from how Aus 29 operated and on that basis we submit that the language in Schedule 4 should be identical to that in Aus 29 to the extent possible. While some of the linguistic differences are minor and inconsequential, other differences do have some effect and may lead to confusion by companies as they seek to comply with the disclosure requirements.

2. Sub-regulation (1), Item 18

All references in this item to 'options and rights' (other than the reference in parentheses) should be changed to 'instruments', as this item deals with instruments other than options or rights over shares.

Sub-regulation (1), Item 20, left column

Our Ref JLDS:150220

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We suggest the words ', in the reporting period,' be deleted. The inclusion of these words would mean this item only applies to loans made etc during the reporting period, which would seem to us to create a difficulty in marrying up those with items in the right column. This would also not be consistent with the equivalent provision in Aus 29.

3. Sub-regulation (1) item 20 and sub-regulation (3A)

Together, these draft sub-regulations appear to be an attempt to reflect paragraph 29.8 and 29.8.1 of Aus 29, however it does not appear to us that the drafting achieves this outcome. In particular, paragraph (b) of sub-regulation (3A), which appears to be intended to reflect paragraph 29.8(b) of Aus 29, appears confusing. Paragraph 29.8(b) of Aus 29 is clear in that disclosure of loan amounts for individuals is only required where the individual's loan amount exceeds \$100,000 during the reporting period. We suggest that item 20 be broken into two separate items to reflect paragraphs (a) and (b) of paragraph 29.8 respectively, and sub-regulation (3A) deleted.

4. Sub-regulation (1) item 21

We suggest the words 'item 19 or 20' should be changed to 'items 6 to 20' to be consistent with the equivalent paragraph of Aus 29 (paragraph 29.9). Transactions disclosed under those previous items ought not have to be disclosed again under this item.

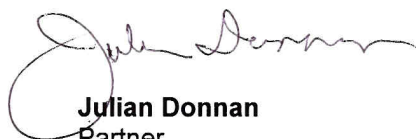
5. Sub-regulation (1) item 23, left column

This should be changed to read: 'In respect of assets and liabilities at the end of the reporting period recognised in relation to transactions identified in accordance with item 21'. This change is suggested in order to avoid any potential inconsistency with paragraph 29.9.2 of Aus 29.

6. Sub-regulation (1) item 24 and sub-regulation (3C)

We suggest this be deleted, as it is covered by sub-regulation (3C), and the drafting is more appropriate in sub-regulation (3C). Furthermore, we suggest sub-regulation (3C) be amended by deleting the words at the beginning "For item 21 of the table in subregulation (1), ", as they are unnecessary.

Yours sincerely



Julian Donnan
Partner
Allens
Julian.Donnan@allens.com.au
T +61 2 9230 4113



Robert Speed
Senior Associate
Allens
Robert.Speed@allens.com.au
T +61 2 9230 5074