

16 September 2016

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

Exposure Draft on the Trustees' review of Structure and Effectiveness: Issues for comment

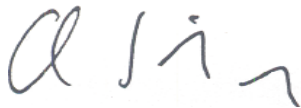
Dear Sir/Madam,

SwissHoldings, the Swiss Federation of Industrial and Services Groups in Switzerland, represents 61 Swiss groups, including most of the country's major industrial and commercial enterprises. We very much welcome the opportunity to provide comments to this Exposure Draft. Our response (in the appendix) has been prepared in conjunction with our member companies.

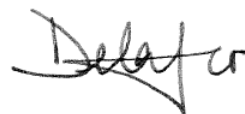
Yours sincerely

SwissHoldings

Federation of Industrial and Service Groups in Switzerland



Christian Stiefel
CEO



Denise Laufer
Senior Policy Manager

cc SH Board

APPENDIX

ANSWERS TO SPECIFIC QUESTION IN INVITATION TO COMMENT

Proposal 1: Geographical distribution of the Trustees – draft proposed change to Section 6 of the *Constitution*

Current <i>Constitution</i> – Section 6	Proposed Amended <i>Constitution</i> – Section 6
<p>All Trustees shall be required to show a firm commitment to the IFRS Foundation and the IASB as a high quality global standard-setter, to be financially knowledgeable, and to have an ability to meet the time commitment. Each Trustee shall have an understanding of, and be sensitive to, the challenges associated with the adoption and application of high quality global accounting standards developed for use in the world’s capital markets and by other users. The mix of Trustees shall broadly reflect the world’s capital markets and diversity of geographical and professional backgrounds. The Trustees shall be required to commit themselves formally to acting in the public interest in all matters. In order to ensure a broad international basis, there shall be:</p> <p>(a) six Trustees appointed from the Asia/Oceania region;</p> <p>(b) six Trustees appointed from Europe;</p> <p>(c) six Trustees appointed from North America;</p> <p>(d) one Trustee appointed from Africa;</p> <p>(e) one Trustee appointed from South America; and</p> <p>(f) two Trustees appointed from any area, subject to maintaining overall geographical balance.</p>	<p>All Trustees shall be required to show a firm commitment to the IFRS Foundation and the IASB as a high quality global standard-setter, to be financially knowledgeable, and to have an ability to meet the time commitment. Each Trustee shall have an understanding of, and be sensitive to, the challenges associated with the adoption and application of high quality global accounting standards developed for use in the world’s capital markets and by other users. The mix of Trustees shall broadly reflect the world’s capital markets and diversity of geographical and professional backgrounds. The Trustees shall be required to commit themselves formally to acting in the public interest in all matters. In order to ensure a broad international basis, there shall be:</p> <p>(a) six Trustees appointed from the Asia/Oceania region;</p> <p>(b) six Trustees appointed from Europe;</p> <p>(c) six Trustees appointed from <u>the</u> North Americas;</p> <p>(d) one Trustee appointed from Africa; and</p> <p>(e) one Trustee appointed from South America; <u>three</u> two Trustees appointed from any area, subject to maintaining overall geographical balance.</p> <p>(f)</p>

SwissHoldings Comments to Proposal 1

We agree with the proposal to combine the Trustees from North and South America.

We supported the initial proposal to increase the Trustees at-large from any area from two to five. We would still wish that at least four Trustees fall into this category in order to increase the flexibility of the composition of the Trustees to react to changing circumstances and to be able to accommodate Trustees that have a more global and less regional perspective.

Proposal 2: The professional background of the Trustees –Section 7 of the *Constitution*

Proposal 3: The remuneration of the Trustees – Section 11 of the *Constitution*

Proposal 4: Focus and frequency of reviews of structure and effectiveness of the IFRS Foundation – Section 17 of the *Constitution*

Proposal 5: The size of the Board – Section 24 of the *Constitution*

Proposal 6: Professional background of the Board – Sections 25 and 27 of the *Constitution*

Proposal 7: Geographical distribution of the Board – Section 26 of the *Constitution*

Proposal 8: Terms of reappointment of the Board – Section 31 of the *Constitution*

Proposal 9: Voting requirements for the Board – Section 36 of the *Constitution*

Proposal 10: Meetings of the IFRS Advisory Council – Section 46 of the *Constitution*

SwissHoldings Comments to Proposal 2-10

SwissHoldings agrees to all these proposals.
